

Hertsmere Local Plan HRA

Regulation 18 Habitats Regulations Assessment

Hertsmere Borough Council

April 2026

Quality information

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1. Introduction

1.1 Background

- 1.1.1 AECOM has been appointed by Hertsmere Borough Council (the Council) to undertake a Habitats Regulations Assessment (HRA) of the emerging Hertsmere Local Plan (HLP). The first stage of this process is an initial Test of Likely Significant Effects (or HRA Screening) on the identified (those sites previously allocated and with planning permission) and potential sites, for housing and commercial development and associated proposed policies.
- 1.1.2 The objective of the screening is to identify any aspects of the HLP that may result in Likely Significant Effects (LSE) on the integrity of the National Site Network (NSN), either in isolation or in combination with other plans and projects. The NSN comprises Habitats Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites).
- 1.1.3 The planning period for the emerging Draft (Regulation 18) HLP is 2027 to 2040.

1.2 Legislation

- 1.2.1 The UK left the European Union (EU) on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 (“the Withdrawal Act”). While the UK is no longer a member of the EU, a requirement for Habitats Regulations Assessment will continue as set out in the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019¹.
- 1.2.2 The HRA process applies the ‘Precautionary Principle’² to Habitats sites. Plans and projects can only be permitted after ascertaining that there will be no adverse effect on the integrity of the European site(s) in question. To ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the Plan or project in question.
- 1.2.3 Figure 1 below sets out the legislative basis for Appropriate Assessment.
- 1.2.4 Plans and projects that are associated with potential adverse impacts on European sites may still be permitted if there are no reasonable alternatives and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

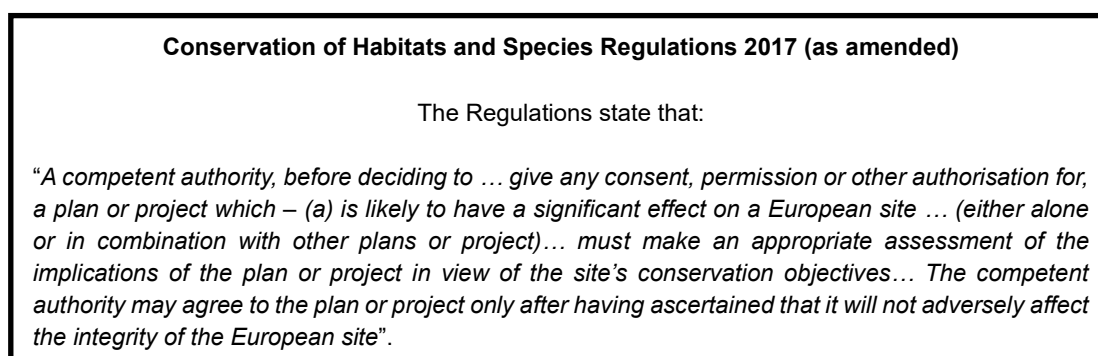


Figure 1: The legislative basis for Appropriate Assessment

- 1.2.5 Over time, the phrase ‘Habitats Regulations Assessment’ (HRA) has come into wide currency to describe the overall process set out in the Regulations from screening through to IROPI. This has

¹ These don’t replace the 2017 Regulations but are just another set of amendments.

² The Precautionary Principle, which is referenced in Article 191 of the Treaty on the Functioning of the European Union, has been defined by the United Nations Educational, Scientific and Cultural Organisation (UNESCO, 2005) as: *“When human activities may lead to morally unacceptable harm [to the environment] that is scientifically plausible but uncertain, actions shall be taken to avoid or diminish that harm. The judgement of plausibility should be grounded in scientific analysis”.*

arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'.

- 1.2.6 In spring 2018, the 'Sweetman' European Court of Justice ruling³ clarified that 'mitigation' (i.e., measures that are specifically introduced to avoid or reduce a harmful effect on a Habitats site that would otherwise arise) should not be taken into account when forming a view on Likely Significant Effects. Mitigation should be considered only at the Appropriate Assessment stage. This HRA is cognisant of that ruling.

1.3 Scope of Assessment

- 1.3.1 There is no pre-defined guidance that dictates the physical scope of an HRA of a Plan document. Current guidance suggests that the following Habitats Sites should be included in the scope of an HRA assessment:
- All Habitats Sites within the boundary of the Hertsmere District; and,
 - Habitats Sites located outside of the District boundary shown to be linked to development in the Hertsmere Local Plan through a known 'pathway' (discussed below).
- 1.3.2 Generally, it is uncommon for development plans to be deemed to have significant impacts on Habitats Sites situated more than 10km from areas of growth. For example, most core recreational catchments (except for some coastal sites) are under 10km in size, and the average vehicle commuting distance of a UK resident is approximately 10km. However, there are exceptions, and it should be noted that the presence of a conceivable impact pathway linking a Plan to a Habitats Site does not mean that Likely LSEs.
- 1.3.3 Development impacts can extend beyond 10km, particularly where hydrological pathways and surface water catchments are involved, which is why the source-pathway-receptor concept is also used to help determine whether there are potential pathways connecting development to Habitats Sites. This takes site-specific sensitivities into account, including issues such as nutrient neutrality or water levels, quantity and flow.
- 1.3.4 Briefly defined, impact pathways are routes by which the implementation of a policy within a Local Plan document can lead to an effect upon a Habitats Site. An example of this would be new residential development resulting in an increased population and thus increased recreational pressure, which could affect Habitats Sites through, for example, disturbance of ground-nesting birds. Guidance from the Ministry of Housing, Communities and Local Government (MHCLG, now the Department for Levelling Up, Housing and Communities (DLUHC)) states that the HRA should be '*proportionate to the geographical scope of the [plan policy]*' and that '*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*' (MHCLG, 2006, p.6)⁴.
- 1.3.5 Some Habitats Sites close to the HLP area (HRLPA) are known to have recreational catchment zones greater than 10km so a precautionary distance of 15km has been used for this HRA.
- 1.3.6 This basic principle has also been reflected in court rulings. The Court of Appeal⁵ has ruled that provided the Council (competent authority) was duly satisfied that proposed mitigation could be 'achieved in practice' to satisfy that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to planning permissions (rather than a Plan level document)⁶. In this case the High Court ruled that for '*a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of Reg 61 of the Habitats Regulations*'.

³ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

⁴ Ministry of Housing, Communities and Local Government. 2006. *Planning for the Protection of European Sites: Appropriate Assessment*. <http://www.communities.gov.uk/index.asp?id=1502244>

⁵No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁶High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

1.4 Quality assurance

- 1.4.1 This report was undertaken in line with AECOM's Integrated Management System (IMS). Our IMS places great emphasis on professionalism, technical excellence, quality, environmental and Health and Safety management. All staff members are committed to establishing and maintaining our certification to the international standards BS EN ISO 9001:2008 and 14001:2004 and BS OHSAS 18001:2007. In addition, our IMS requires careful selection and monitoring of the performance of all sub-consultants and contractors.
- 1.4.2 All AECOM Ecologists working on this project are members (at the appropriate level) of the Chartered Institute of Ecology and Environmental Management (CIEEM) and follow their code of professional conduct (CIEEM, 2025)⁷

2. Methodology

2.1 Introduction to HRA Methodology

- 2.1.1 The HRA will be carried out with reference to the general EC guidance on HRA⁸ and that of the UK government⁹.
- 2.1.2 **Figure 2** below outlines the stages of HRA. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the Plan until no significant adverse effects remain.

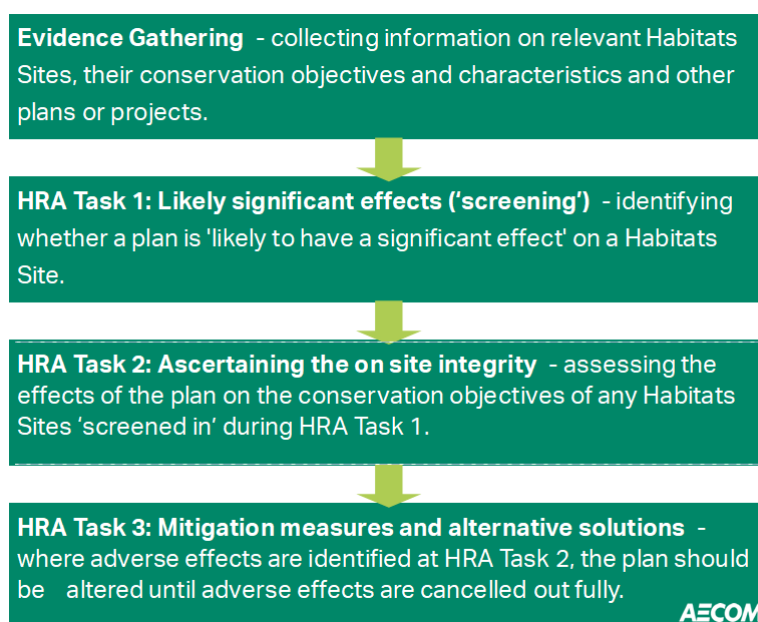


Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source EC, 2021.

⁷ CIEEM (2025) Code of Professional Conduct available at cieem.net/wp-content/uploads/2019/02/Code-of-Professional-Conduct-April-2025.pdf

⁸ European Commission (2021): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁹ <https://www.gov.uk/guidance/appropriate-assessment>

2.2 Description of HRA Tasks

HRA Task 1 – Screening for Likely Significant Effects

- 2.2.1 Following evidence gathering, the first stage of any Habitats Regulations Assessment is the screening for LSE, essentially a high-level assessment to decide whether the full subsequent stage, known as Appropriate Assessment, is required. The essential question is:

“Is the project, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon Habitats sites?”

- 2.2.2 The objective is to filter out those Plans and projects that can, without any detailed appraisal, be concluded to be unlikely to result in any impacts upon Habitats Sites, usually because there is no mechanism for a negative interaction. This stage is undertaken in Chapter 5 of this report and in Appendices B and C.

HRA Task 2 – Appropriate Assessment

- 2.2.3 Where a conclusion of ‘no Likely Significant Effects’ cannot be drawn, the analysis proceeds to the next stage of HRA known as Appropriate Assessment (AA). Case law has clarified that ‘Appropriate Assessment’ is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to AA compared to the screening stage.
- 2.2.4 By virtue of the fact that it follows screening for LSE, there is a clear implication that the analysis will be more detailed than undertaken at the previous stage. One of the key considerations during AA is whether there is available mitigation that would entirely address the potential effect. In practice, the AA would take any proposed policies or identified and potential sites that could not be dismissed following the high-level screening and assess the potential for an effect in more detail, with a view to concluding whether there would be a potential for an adverse effect on site integrity (in other words, disruption of the coherent structure and function of the Habitats Site(s)). A decision by the European Court of Justice¹⁰ concluded that measures intended to avoid or reduce the harmful effects of a proposed Plan or project on a Habitats Site may no longer be considered by competent authorities at the screening for LSEs stage of HRA. That ruling has been taken into account in producing this HRA.
- 2.2.5 Also, in 2018, the Holohan ruling¹¹ was handed down by the European Court of Justice. Among other provisions paragraph 39 of the ruling states that ‘*As regards other habitat types or species, which are present on the site, but for which that site has not been listed, and with respect to habitat types and species located outside that site, ... typical habitats or species must be included in the appropriate assessment, if they are necessary to the conservation of the habitat types and species listed for the protected area*’ [emphasis added]. Due account of this decision has been given in this HRA.

HRA Task 3 – Avoidance and Mitigation

- 2.2.6 Where necessary, measures are recommended for incorporation into the Plan in order to mitigate and/or avoid adverse effects on Habitats Sites. There is considerable precedent for the level of detail a Local Plan document should include regarding mitigation for impact pathways on Habitats Sites (e.g., recreational pressure). The implication of this precedent is that it is not necessary for all measures to be fully developed prior to adoption of the Plan, but the Plan must provide an adequate policy framework within which these measures can be delivered.
- 2.2.7 When discussing mitigation for a Local Plan, one is concerned primarily with the policy framework to enable the delivery of such mitigation rather than the details of the mitigation measures themselves, since a Local Plan document is a high-level policy document.
- 2.2.8 In any Local Plan, there are numerous policies for which there is a limit to the degree of assessment that is possible at the Plan level. This is because either:
- The policy in question does not contain any specifics as to what will be delivered or where, and so cannot be assessed in detail at the Plan level. In these cases, the Appropriate Assessment focuses

¹⁰ People Over Wind and Sweetman v Coillte Teoranta (C-323/17)

¹¹ Case C-461/17

on precautionary mitigation that can be included in the plan to ensure that whatever proposals come forward will not result in adverse effects on integrity; or

- The nature of potential impacts (e.g. visual and noise disturbance arising from construction or loss of functionally linked habitat) is related to how the development will be designed and constructed and therefore cannot be assessed in detail at the plan level. In these instances, the Appropriate Assessment focuses on available mitigation measures, the extent to which such measures would be achievable and effective, and whether an adequate protective framework exists to ensure that the policy would not lead to an adverse effect on the integrity of any internationally designated sites.

2.2.9 In these instances, the advice of Advocate-General Kokott¹² is also worth considering. She commented that: *'It would ...hardly be proper to require a greater level of detail in preceding plans [rather than planning applications] or the abolition of multi-stage planning and approval procedures so that the assessment of implications can be concentrated on one point in the procedure. Rather, adverse effects on areas of conservation must be assessed at every relevant stage of the procedure to the extent possible on the basis of the precision of the plan. This assessment is to be updated with increasing specificity in subsequent stages of the procedure.'* [emphasis added].

2.3 In-combination Plans

2.3.1 The following plans are considered to have the potential to act in-combination with the HLP:

- Affinity Water: Water Resource Management Plan¹³
- Barnet Local Plan 2021-2036¹⁴
- Enfield Regulation 19 Draft Local Plan¹⁵
- The London Plan 2021¹⁶
- Harrow Regulation 18 Draft Local Plan 1021-2041¹⁷
- Hertfordshire Minerals and Waste Local Plan to 2040 (Draft)¹⁸
- St Albans Regulation 18 Draft Local Plan to 2041¹⁹
- Three Rivers Local Development Framework Core Strategy²⁰ to 2026
- Watford Local Plan 2021-2038²¹
- Welwyn Hatfield Local Plan 2016-2036²²

2.3.2 It should be noted that, while their broad potential effects are considered, this assessment does not undertake full HRA of each of these planning documents. Instead, existing HRAs conducted for surrounding LPAs were drawn upon.

¹² Opinion of Advocate General Kokott, 9th June 2005, Case C-6/04. Commission of the European Communities v United Kingdom of Great Britain and Northern Ireland, paragraph 49

<http://curia.europa.eu/juris/document/document.jsf?docid=58359&doclang=EN>

¹³ Available at: <https://affinitywater.uk/engagement/hq.com/wrmp> [Accessed 27/01/2026]

¹⁴ Available at: <https://www.barnet.gov.uk/planning-and-building-control/planning-policies-and-local-plan/barnet-local-plan-2021-2036/adoption-documents> [Accessed 27/01/2026]

¹⁵ Available at:

<https://enfield.moderngov.co.uk/documents/s110940/Traveller%20Local%20Plan%20Regulation%2019%20report.pdf> [Accessed 27/01/2026]

¹⁶ Available at: https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf [Accessed 01/04/2026]

¹⁷ Available at: <https://www.harrow.gov.uk/planning-developments/new-local-plan-consultation> [Accessed 27/01/2026]

¹⁸ Available at: <https://www.hertfordshire.gov.uk/media-library/documents/waste/mwlp/core-document-library/core-documents/cd-01-minerals-and-waste-local-plan-draft-plan-jul-2022.pdf> [Accessed 27/01/2026]

¹⁹ Available at: <https://stalbens.objective.co.uk/file/6193723> [Accessed 27/01/2026]

²⁰ Available at [https://cdn-trdc.prod.trdc.blazecms.app/files/2023/01/945fc600-9ff2-11ed-8d80-6dc425ce7e94-core-strategy-adopted-17-oct-2011%20\(1\).pdf](https://cdn-trdc.prod.trdc.blazecms.app/files/2023/01/945fc600-9ff2-11ed-8d80-6dc425ce7e94-core-strategy-adopted-17-oct-2011%20(1).pdf) [Accessed 01/04/2026]

²¹ Available at: <https://www.watford.gov.uk/downloads/file/1264/watford-local-plan> [Accessed 27/01/2026]

²² Available at: <https://www.welhat.gov.uk/downloads/file/876/welwyn-hatfield-local-plan-2016-2036> [Accessed 27/01/2026]

3. Habitats Sites Background

3.1 Chilterns Beechwoods SAC

Introduction²³

- 3.1.1 The Chilterns Beechwoods represent a very extensive tract of ancient semi-natural beech *Fagus sylvatica* forests in the centre of the habitat's UK range. The woodland is an important part of a mosaic with species-rich chalk grassland and scrub. A distinctive feature in the woodland flora is the occurrence of the rare coralroot *Cardamine bulbifera*. Standing and fallen dead timber provide habitat for dead-wood (saproxylic) invertebrates, including stag beetle *Lucanus cervus*.

Qualifying Features²⁴

- 3.1.2 Chilterns Beechwoods qualifies as a SAC for both habitats and species.
- *Asperulo-Fagetum* beech forests. (Beech forests on neutral to rich soils)
 - Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*). (Dry grasslands and scrublands on chalk or limestone)
 - Stag beetle *Lucanus cervus*

Conservation Objectives²⁵

- 3.1.3 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats and habitats of qualifying species.
 - The structure and function (including typical species) of qualifying natural habitats.
 - The structure and function of the habitats of qualifying species.

Environmental Vulnerabilities²⁶

- 3.1.4 The main threats and activities with impacts on the site are:
- Forestry and woodland management,
 - Deer,
 - Changes in species distributions,
 - Invasive species,
 - Disease,
 - Public access/ disturbance, and
 - Air pollution: Nitrogen deposition.

3.2 Epping Forest SAC

Introduction²⁷

- 3.2.1 Part of the Epping Forest SAC is located within Epping Forest District. Approximately 70% of the 1,600 hectare site consists of broadleaved deciduous woodland, and it is one of only a few remaining large-

²³ Available at: <https://publications.naturalengland.org.uk/file/4855330563424256> [Accessed 27/01/2026]

²⁴ Ibid

²⁵ Available at: <https://publications.naturalengland.org.uk/file/4961243408629760> [Accessed 27/01/2026]

²⁶ Available at: <https://publications.naturalengland.org.uk/file/5908864568393728> [Accessed 27/01/2026]

²⁷ Available at: <https://publications.naturalengland.org.uk/file/5153389482606592> [Accessed 27/01/2026]

scale examples of ancient wood-pasture in lowland Britain. Epping Forest SAC supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

Qualifying Features²⁸

3.2.2 Epping Forest qualifies as a SAC for both habitats and species.

- Beech forests on acid soils with *Ilex* and sometime *Taxus* in the shrublayer.
- Wet heathland with cross-leaved heath; and
- Dry heath
- Stag beetle *Lucanus cervus*

Conservation Objectives²⁹

3.2.3 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species

Environmental Vulnerabilities³⁰

3.2.4 The main threats and activities with impacts on the site are:

- Air pollution,
- Under grazing,
- Public disturbance,
- Changes in species distribution,
- Inappropriate water levels,
- Water pollution,
- Invasive species, and
- Disease.

3.3 Lee Valley Ramsar

Introduction³¹

3.3.1 The Lee Valley SPA comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits along approximately 24km of the valley. These waterbodies support internationally important numbers of wintering gadwall and shoveler and nationally important numbers of several other bird species.

3.3.2 The site also contains a range of wetland and valley bottom habitats, both man-made and semi-natural, which support a diverse range of wetland fauna and flora.

²⁸ Ibid

²⁹ Available at: <https://publications.naturalengland.org.uk/file/5442443424301056> [Accessed 27/01/2026]

³⁰ Available at: <https://publications.naturalengland.org.uk/file/5732004727881728> [Accessed 27/01/2026]

³¹ Available at: <https://rsis.ramsar.org/RISapp/files/RISrep/GB1037RIS.pdf> [Accessed 27/01/2026]

Qualifying Features³²

3.3.3 The Ramsar is designated for the following features:

- Criterion 2: The site supports the nationally scarce whorled watermilfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a waterboatman).
- Criterion 6: Over winter the site regularly supports internationally important populations of: Gadwall *Ansa strepera*, Shoveler *Anas clyptea*

Conservation Objectives

3.3.4 The legal conservation status is as defined for;

- Lee Valley SPA.

Environmental Vulnerabilities

3.3.5 Conservation objectives are taken to be the same as those for Lee Valley SPA.

3.4 Lee Valley SPA

Introduction³³

3.4.1 The Lee Valley SPA comprises a series of embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that display a range of man-made and semi-natural wetland and valley bottom habitats.

Qualifying Features³⁴

3.4.2 The SPA is designated for the following features:

- Bittern *Botaurus stellaris* (Wintering)
- Shoveler *Anas clyptea* (Wintering)
- Gadwall *Anas strepera* (Wintering)

Conservation Objectives³⁵

3.4.3 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring;

- The extent and distribution of the habitats of the qualifying features
- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

Environmental Vulnerabilities³⁶

3.4.4 The main threats and activities with impacts on the site are:

- Water pollution,
- Hydrological Changes,

³² [ibid](#)

³³ Available at: <https://publications.naturalengland.org.uk/file/6230224169598976> [Accessed 27/01/2026]

³⁴ [ibid](#)

³⁵ Available at: <https://publications.naturalengland.org.uk/file/6516586265706496> [Accessed 27/01/2026]

³⁶ Available at: <https://publications.naturalengland.org.uk/file/5788502547496960> [Accessed 27/01/2026]

- Public Access/ Disturbance,
- Inappropriate scrub control,
- Fisheries: Fish stocking,
- Invasive species,
- Inappropriate cutting/ mowing, and
- Air pollution: risk of atmospheric nitrogen deposition.

3.5 Wormley-Hoddesdonpark Woods SAC

Introduction³⁷

- 3.5.1 Wormley Hoddesdonpark Woods has large stands of almost pure hornbeam *Carpinus betulus* (former coppice), with sessile oak *Quercus petraea* standards. Areas dominated by bluebell *Hyacinthoides non-scripta* do occur, but elsewhere there are stands of great wood-rush *Luzula sylvatica* with carpets of the mosses *Dicranum majus* and *Leucobryum glaucum*. Locally, a bryophyte community more typical of continental Europe occurs, including the mosses *Dicranum montanum*, *D. flagellare* and *D. tauricum*.

Qualifying Features³⁸

- 3.5.2 The SAC is designated for the following features:
- Sub-Atlantic and medio-European oak or oak-hornbeam forests of the *Carpinion betuli*. (Oak-hornbeam forests).

Conservation Objectives³⁹

- 3.5.3 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;
- The extent and distribution of qualifying natural habitats
 - The structure and function (including typical species) of qualifying natural habitats, and
 - The supporting processes on which qualifying natural habitats rely

Environmental Vulnerabilities⁴⁰

- 3.5.4 The main threats and activities with impacts on the site are:
- Disease,
 - Invasive species,
 - Air pollution: risk of atmospheric nitrogen deposition,
 - Deer,
 - Vehicles: illicit,
 - Forestry and woodland management, and
 - Public access/ disturbance.

³⁷ Available at: <https://publications.naturalengland.org.uk/file/5608903748354048> [Accessed 27/01/2026]

³⁸ Ibid

³⁹ Available at: <https://publications.naturalengland.org.uk/file/4515961222987776> [Accessed 27/01/2026]

⁴⁰ Available at: <https://publications.naturalengland.org.uk/file/6541134543192064> [Accessed 27/01/2026]

4. Identified Impact Pathways

4.1 Evaluation of impact pathways

- 4.1.1 Impact pathways of possible relevance to each Habitats Site have been identified based on the environmental vulnerabilities listed in the Site Improvement Plans and professional judgement, these are listed in Table 1.

Table 1. Potential Impact pathways applicable to Habitats Sites

Habitats Sites	Potential Impact Pathways
Chilterns Beechwoods SAC	<ul style="list-style-type: none"> Air pollution: Nitrogen deposition Loss of functionally linked habitat for stag beetle Recreational Pressure
Epping Forest SAC	<ul style="list-style-type: none"> Air pollution: Nitrogen deposition Loss of functionally linked habitat for stag beetle Recreational pressure Water quality Water quantity, Level and Flow
Lee Valley SPA / Ramsar	<ul style="list-style-type: none"> Air pollution: Nitrogen deposition Loss of functionally linked habitat Recreational pressure Water quality Water quantity, Level and Flow
Wormley-Hoddesdonpark Woods SAC	<ul style="list-style-type: none"> Air pollution: Nitrogen deposition Recreational pressure

4.2 Atmospheric Pollution (Nitrogen Deposition)

- 4.2.1 The main pollutants of concern for Habitats Sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂) and are summarised in Table 1. Ammonia can have a direct toxic effect upon vegetation, particularly at close distances to the source, such as near road verges⁴¹. NO_x can also be toxic at very high concentrations (far above the annual average Critical Level). High levels of NO_x and NH₃ are likely to increase the total nitrogen (N) deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in atmospheric nitrogen deposition can, if sufficiently large, enhance soil fertility and lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats⁴²
⁴³.

Table 2. Main sources and effects of air pollutants on habitats and species⁴⁴

Pollutant	Source	Effects on habitats and species
Sulphur Dioxide (SO ₂)	<p>The main sources of SO₂ are electricity generation and industrial and domestic fuel combustion. However, total SO₂ emissions in the UK have decreased substantially since the 1980s.</p> <p>Another origin of sulphur dioxide is the shipping industry, and high atmospheric concentrations of SO₂ have been documented in busy ports. In</p>	<p>Wet and dry deposition of SO₂ acidifies soils and freshwater, and may alter the composition of plant and animal communities.</p> <p>The magnitude of effects depends on levels of deposition, the buffering capacity of soils and the sensitivity of impacted species.</p> <p>However, SO₂ background levels have fallen considerably since the 1980s and are now not</p>

⁴¹ http://www.apis.ac.uk/overview/pollutants/overview_NOx.htm.

⁴² Wolseley, P. A.; James, P. W.; Theobald, M. R.; Sutton, M. A. (2006). Detecting changes in epiphytic lichen communities at sites affected by atmospheric ammonia from agricultural sources. *Lichenologist* **38**: 161-176.

⁴³ Dijk, N. (2011). Dry deposition of ammonia gas drives species change faster than wet deposition of ammonium ions: evidence from a long-term field manipulation. *Global Change Biology* **17**: 3589-3607.

⁴⁴ Information summarised from the Air Pollution Information System (<http://www.apis.ac.uk/>).

	<p>future years, shipping is likely to become one of the most important contributors to SO₂ emissions in the UK.</p>	<p>regarded as a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to the return of lichen species and improved tree health in London.</p>
Acid deposition	<p>Leads to acidification of soils and freshwater via atmospheric deposition of SO₂, NO_x, ammonia, and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, with most of this attributed to lower sulphate levels.</p>	<p>Gaseous precursors (e.g. SO₂) can cause direct damage to sensitive vegetation, such as lichen, upon deposition.</p> <p>Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds/plants.</p> <p>Not all sites are equally susceptible to acidification. This varies depending on soil type, bedrock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz-rich rocks tend to be more susceptible.</p>
Ammonia (NH ₃)	<p>Ammonia is a reactive, soluble, alkaline gas released following the decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock, and it is also emitted from some industrial processes and vehicle exhausts.</p> <p>Ammonia reacts with acid pollutants such as the products of SO₂ and NO_x emissions to produce fine ammonium (NH₄⁺) – containing aerosol. Due to its significantly longer lifetime, NH₄⁺ may be transferred much longer distances (and can therefore be a significant transboundary issue).</p> <p>While ammonia deposition rates can be estimated from atmospheric concentrations; they are strongly influenced by meteorology and ecosystem type.</p>	<p>The negative effect of NH₄⁺ may occur via direct toxicity, when uptake exceeds detoxification capacity and via nitrogen accumulation.</p> <p>Its main adverse effect is eutrophication, leading to assemblages dominated by fast-growing, tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen.</p> <p>As emissions mostly occur at ground level in rural environments and NH₃ is rapidly deposited, some of the most acute problems of NH₃ deposition occur in small relict nature reserves located in intensive agricultural landscapes.</p>
Nitrogen oxides (NO _x)	<p>Nitrogen oxides are mostly produced in combustion processes. Half of NO_x emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. NO_x concentrations have been falling for decades due to improvements in vehicle emissions technology, and this will accelerate after 2035 as electric vehicles (or other non-combustion engine vehicles) spread through the vehicle fleet following the Government's ban on the sale of new petrol and diesel cars and vans in 2035.</p>	<p>Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of No_x for all vegetation types has been set to 30 ug/m³.</p> <p>Deposition of nitrogen compounds (nitrates (NO₃), nitrogen dioxide (NO₂) and nitric acid (HNO₃)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification.</p> <p>In addition, NO_x contributes to soil and water eutrophication, altering plant community species composition at the expense of sensitive species.</p>
Nitrogen (N) deposition	<p>The pollutants that contribute to the total nitrogen deposition derive mainly from oxidised (e.g. NO_x) or reduced (e.g. NH₃) nitrogen emissions (described separately above). While oxidised nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices.</p> <p>The nitrogen pollutants together are a large contributor to acidification (see above).</p>	<p>All plants require nitrogen compounds to grow, but excessive overall N is widely regarded as the major driver of biodiversity change globally.</p> <p>Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from nitrogen eutrophication. This is because many semi-natural plants cannot assimilate the surplus nitrogen as well as many graminoid (grass) species.</p> <p>Nitrogen deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.</p>
Ozone (O ₃)	<p>A secondary pollutant generated by photochemical reactions involving NO_x, volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above). Increasing anthropogenic emissions of ozone precursors in the UK have led to more days when ozone levels exceed 40 ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to</p>	<p>Concentrations of O₃ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O₃ concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reductions in floral biomass, reductions in crop yield (e.g., cereal grains, tomato, potato), reductions in the number of flowers, decreases in forest production, and altered species composition in semi-natural plant communities.</p>

require action at the international level to reduce levels of the precursors that form ozone.

- 4.2.2 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping⁴⁵. As such, these will not be associated with Local Plan growth. Ammonia emissions originate from agricultural practices⁴⁶, with some chemical processes also making notable contributions and traffic also contributing materially at a local scale. NOx emissions are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion of its overall NOx footprint (92%) through associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison⁴⁷. Therefore, emissions of NOx and ammonia can reasonably be expected to increase as a result of the Plan, primarily due to increased commuter traffic associated with housing growth.
- 4.2.3 The World Health Organisation has the following critical thresholds for plant communities: The critical NOx concentration (critical level) for the protection of vegetation is 30 $\mu\text{g m}^{-3}$ and the critical level for ammonia 1-3 $\mu\text{g m}^{-3}$ (depending on whether normal vegetation or lichens and bryophytes are involved). Additionally, ecological studies have determined 'Critical Loads'⁴⁸ of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH₃).
- 4.2.4 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roads to local pollution levels is insignificant (Figure 3 and reference⁴⁹). Therefore, this distance has been used throughout this HRA to determine whether Likely Significant Effects (LSEs) on sensitive Habitats Sites may arise due to implementation of the Plan.

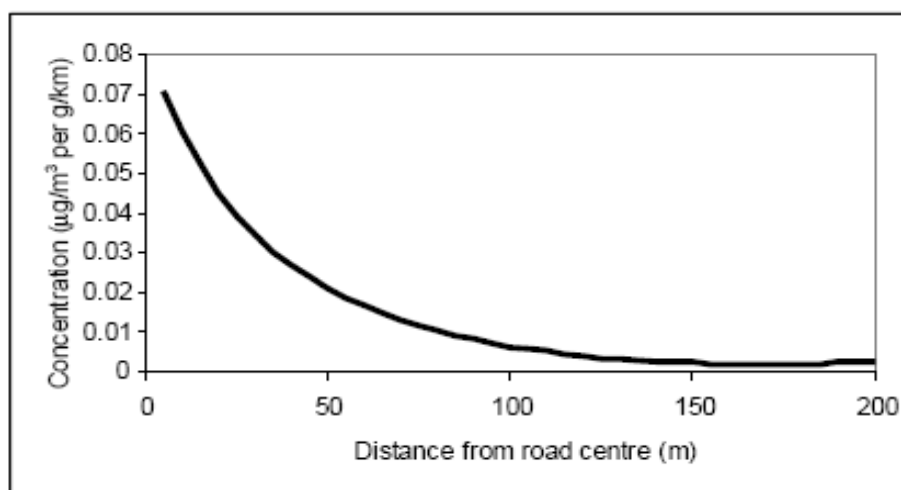


Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT⁵⁰)

- 4.2.5 Overall, the following Habitats Sites are considered potentially sensitive to atmospheric nitrogen deposition, primarily due to the presence of nutrient-limited habitats and are taken forward into screening:
- Chilterns Beechwoods SAC,
 - Epping Forest SAC,
 - Lee Valley SPA /Ramsar, and

⁴⁵ http://www.apis.ac.uk/overview/pollutants/overview_SO2.htm.

⁴⁶ Pain, B.F.; Weerden, T.J.; Chambers, B.J.; Phillips, V.R.; Jarvis, S.C. (1998). A new inventory for ammonia emissions from U.K. agriculture. *Atmospheric Environment* **32**: 309-313.

⁴⁷ Proportions calculated based upon data presented in Dore CJ et al. 2005. UK Emissions of Air Pollutants 1970 – 2003. UK National Atmospheric Emissions Inventory. <http://www.airquality.co.uk/archive/index.php> [Accessed on the 21/10/2021]

⁴⁸ The critical load is the rate of deposition beyond which research indicates that adverse effects can reasonably be expected to occur.

⁴⁹ Available at: <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013> [Accessed on the 21/10/2021]

⁵⁰ Available at: <http://www.dft.gov.uk/ha/standards/dmrb/vol11/section3/ha20707.pdf> [Accessed on the 21/10/2021]

- Wormley-Hoddesdonpark Woods SAC.

4.3 Loss of Functionally Linked Habitat

- 4.3.1 While most Habitats Sites have been geographically defined to encompass the key features that are necessary for coherence of their structure and function, and the support of their qualifying features, this is not necessarily the case. A diverse array of qualifying species, including birds, bats and amphibians, are not always confined to the boundary of designated sites.
- 4.3.2 For example, the highly mobile nature of both wader and waterfowl species implies that areas of habitat of crucial importance to the integrity of their populations lie outside the physical limits of Habitats Sites. Although not part of the formal designation, these habitats are integral to the maintenance of the designated site's structure and function, for example, by encompassing important foraging grounds. Therefore, land use plans that may affect such functionally linked habitats require further assessment.
- 4.3.3 There is now an abundance of authoritative examples of HRA cases on plans affecting bird populations, where Natural England has identified the potential importance of functionally linked land. For example, bird surveys conducted in relation to a previous HRA indicated that approximately 25% of the golden plover population in the Somerset Levels and Moors SPA were affected while on functionally linked land, which required the inclusion of mitigation measures in the relevant plan policy wording. Another important case study originates from the Mersey Estuary SPA/Ramsar, where adjacent, functionally linked land had a peak survey count of 108% of the 5-year mean peak population of golden plover. This finding led to significant amendments to the planning proposal to ensure that site integrity was not adversely affected.
- 4.3.4 Research on stag beetle dispersal⁵¹ concludes that, *“for the conservation of the European stag beetle, it is essential to provide stepping-stones of suitable dead wood, preferably every 100m and not more than 1km apart”*. These may be outside the SAC, and their presence or absence may influence connectivity and the SAC's ability to meet its conservation objectives.
- 4.3.5 Generally, the identification of an area as functionally linked habitat is not always a straightforward process. The importance of non-designated land parcels may not be apparent and thus might require the analysis of existing data sources (e.g. Bird Atlases or data from records centres) to be firmly established. In some cases, data may not be available, requiring additional survey work.
- 4.3.6 Overall, the available baseline information suggests that the following Habitats Sites are sensitive to the loss of functionally linked habitats due to the presence of mobile waterfowl and are taken forward into screening:
- Chiltern Beechwoods SAC (stag beetle)
 - Epping Forest SAC (stag beetle)
 - Lee Valley SPA/Ramsar (gadwall and shoveler)

4.4 Recreational Pressure

- 4.4.1 There is concern over the cumulative impacts of recreation on key nature conservation sites in the UK, as most sites must fulfil conservation objectives while also providing recreational opportunities. Various research reports have provided compelling links between changes in housing and access levels⁵², and impacts on Habitats protected sites^{53 54}. This applies to any habitat, but recreational pressure from housing growth is of particular significance for Habitats Sites designated for their bird interest. Different Habitats Sites are subject to different types of recreational pressures and have different vulnerabilities.

⁵¹ Thomaes, A., Dhont, P., Dekeukeleire, D. and Vandekerckhove, K. (2018), Dispersal behaviour of female stag beetles (*Lucanus cervus*) in a mosaic landscape: when should I stay and where should I go. *Insect Conserv Divers*, 11: 523-533. Available at: <https://doi.org/10.1111/icad.12325>

⁵² Weitowitz D.C., Panter C., Hoskin R. & Liley D. (2019). The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology* 5. <https://doi.org/10.1093/jue/iuz019>

⁵³ Liley D, Clarke R.T., Mallord J.W., Bullock J.M. (2006a). The effect of urban development and human disturbance on the distribution and abundance of nightjars on the Thames Basin and Dorset Heaths. Natural England / Footprint Ecology.

⁵⁴ Liley D., Clarke R.T., Underhill-Day J., Tyldesley D.T. (2006b). Evidence to support the appropriate Assessment of development plans and projects in south-east Dorset. Footprint Ecology / Dorset County Council.

Studies across a range of species have shown that the effects of recreation can be complex. HRAs of planning documents tend to focus on recreational sources of disturbance as a result of new residents⁵⁵.

4.4.2 Most terrestrial habitats (especially heathland, woodland and dune systems) can be affected by trampling and other mechanical damage, which dislodges individual plants, leads to soil compaction and erosion. The following studies have assessed the impact of trampling associated with different recreational activities in different habitats:

- Wilson & Seney⁵⁶ examined the degree of track erosion caused by hikers, motorcyclists, horse riders and cyclists in 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks and, therefore, caused more erosion than motorcycles and bicycles.
- Cole et al⁵⁷ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each trampled between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks, indicating some recovery of the vegetation. Differences in plant morphology were found to explain more variation in response than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. The cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks, but had recovered well after one year, and as such, these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
- Cole⁵⁸ conducted a follow-up study (across four vegetation types) in which shoe type (trainers or walking boots) and trampling weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no differential impact on vegetation cover.
- Cole & Spildie⁵⁹ experimentally compared the effects of off-track trampling by hikers and horse riders (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse trampling was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered the greatest disturbance but recovered rapidly. Generally, higher trampling intensity led to greater disturbance.
- In heathland sites, trampling damage can affect the value of a site to wildlife. For example, heavy use of sandy tracks loosens and continuously disturbs sand particles, reducing the habitat's suitability for invertebrates⁶⁰. Species that burrow into flat surfaces, such as the centres of paths, are likely to be particularly vulnerable, as loose sediment can no longer support their burrows. In some instances, nature conservation bodies and local authorities resort to hardening paths to

⁵⁵ The RTP1 report 'Planning for an Ageing Population' (2004) which states that 'From being a marginalised group in society, the elderly are now a force to be reckoned with and increasingly seen as a market to be wooed by the leisure and tourist industries. There are more of them and generally they have more time and more money.' It also states that 'Participation in most physical activities shows a significant decline after the age of 50. The exceptions to this are walking, golf, bowls and sailing, where participation rates hold up well into the 70s'.

⁵⁶ Wilson, J.P. & J.P. Seney. (1994). Erosional impact of hikers, horses, motorcycles and off-road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

⁵⁷ Cole, D.N. (1995a). Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. (1995b). Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

⁵⁸ Cole, D.N. (1995c). Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

⁵⁹ Cole, D.N., Spildie, D.R. (1998). Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* 53: 61-71

⁶⁰ Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

prevent further erosion. However, this is concomitant with the loss of habitat used by wildlife, such as sand lizards and burrowing invertebrates.

- 4.4.3 A major concern for nutrient-poor terrestrial habitats (e.g. heathlands, sand dunes, bogs and fens) is nutrient enrichment associated with dog fouling (addressed in various reviews, e.g.⁶¹). It is estimated that dogs will defecate within 10 minutes of starting a walk, and therefore most nutrient enrichment arising from dog faeces will occur within 400m of a site entrance. In contrast, dogs will urinate at frequent intervals during a walk, resulting in a wider distribution of urine. For example, in Burnham Beeches National Nature Reserve, it is estimated that 30,000 litres of urine and 60 tonnes of dog faeces are deposited annually⁶². While there is limited information on the chemical constituents of dog faeces, nitrogen is one of the main components⁶³. Nutrient availability is the major determinant of plant community composition, and the effect of dog defecation in sensitive habitats is comparable to a high-level fertiliser application, potentially shifting plant communities towards those more typical of improved grasslands.
- 4.4.4 Human activity can affect birds either directly (e.g. by eliciting flight responses) or indirectly (e.g. by damaging habitat or reducing bird fitness in less obvious ways, such as through inducing stress responses). The most obvious direct effect is that of immediate mortality, such as death by shooting, but human activity can also lead to much subtler behavioural (e.g. alterations in feeding behaviour, avoidance of certain areas and use of sub-optimal areas, etc.) and physiological changes (e.g. an increase in heart rate). While such changes are less noticeable, they might result in major population-level changes by altering the balance between immigration/birth and emigration/death⁶⁴.
- 4.4.5 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily, and the time spent responding to disturbance is time that is not spent feeding⁶⁵. Disturbance therefore increases energetic expenditure while reducing energetic intake, which can adversely affect the 'condition' and ultimately survival of birds. Additionally, displacement of birds from one feeding site to another can increase pressure on resources at alternative foraging sites, which must sustain a greater number of birds⁶⁶. Moreover, the higher proportion of time a breeding bird spends away from its nest, the more likely it is that eggs will cool and the more vulnerable they, or any nestlings, are to predators. Recreational effects on ground-nesting birds are particularly severe, with many studies concluding that urban sites support lower densities of key species, such as stone curlew and nightjar^{67,68}.
- 4.4.6 Several factors (e.g. seasonality, type of recreational activity) may have pronounced impacts on the nature of bird disturbance. Disturbance in winter may be more impactful because food shortages make birds more vulnerable at this time of the year. In contrast, this may be counterbalanced by fewer recreational users in the winter months and lower overall sensitivity of birds outside the breeding season. The literature suggests that the magnitude of disturbance differs significantly across types of recreational activities. For example, dog walking leads to a significantly higher reduction in bird diversity and abundance compared to hiking⁶⁹. Scientific evidence also suggests that key disturbance parameters, such as areas of influence and flush distance, are significantly greater for dog walkers than hikers⁷⁰. Furthermore, differences in on-site route lengths and usage patterns likely imply that key spatial and temporal parameters (such as the area of a site potentially impacted and the frequency of disturbance) will also differ between recreational activities. This suggests that activity type should be taken into account in HRAs.

⁶¹ Taylor K., Anderson P., Taylor R.P., Longden K. & Fisher P. (2005). Dogs, access and nature conservation. English Nature Research Report, Peterborough.

⁶² Barnard A. (2003). Getting the facts – Dog walking and visitor number surveys at Burnham Beeches and their implications for the management process. *Countryside Recreation* 11:16-19.

⁶³ Taylor K., Anderson P., Liley D. & Underhill-Day J.C. (2006). Promoting positive access management to sites of nature conservation value: A guide to good practice. English Nature / Countryside Agency, Peterborough and Cheltenham.

⁶⁴ Riley, J. (2003). Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

⁶⁵ Riddington, R. *et al.* (1996). The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279.

⁶⁶ Gill, J.A., Sutherland, W.J. & Norris, K. (1998). The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72.

⁶⁷ Clarke R.T., Liley D., Sharp J.M., Green R.E. (2013). Building development and roads: Implications for the distribution of stone curlews across the Brecks. *PLOS ONE*. <https://doi:10.1371/journal.pone.0072984>.

⁶⁸ Liley D. & Clarke R.T. (2003). The impact of urban development and human disturbance on the numbers of nightjar *Caprimulgus europaeus* on heathlands in Dorset, England. *Biological Conservation* 114: 219-230.

⁶⁹ Banks P.B., Bryant J.Y. (2007). Four-legged friend or foe? Dog walking displaces native birds from natural areas. *Biology Letters* 3: 14pp.

⁷⁰ Miller S.G., Knight R.L., Miller C.K. (2001). Wildlife responses to pedestrians and dogs. *Wildlife Society Bulletin* 29: 124-132.

4.4.7 Overall, the available baseline information suggests that the following Habitats Sites are sensitive to recreational pressure:

- Chiltern Beechwoods SAC
- Epping Forest SAC
- Lee Valley SPA/Ramsar
- Wormley-Hoddesdonpark Woods SAC

4.5 Water Quality

4.5.1 The quality of the water that feeds European sites is an important determinant of the nature of their habitats and the species they support. Poor water quality can have a range of environmental impacts:

4.5.2 At high levels, toxic chemicals and metals can result in immediate death of aquatic life, and can have detrimental effects even at lower levels, including increased vulnerability to disease and changes in wildlife behaviour.

- Eutrophication, the enrichment of plant nutrients in water, increases plant growth and consequently results in oxygen depletion. Algal blooms, which commonly result from eutrophication, increase turbidity and decrease light penetration. The decomposition of organic wastes that often accompanies eutrophication deoxygenates water further, augmenting the oxygen-depleting effects of eutrophication. In the marine environment, nitrogen is the limiting plant nutrient, and so eutrophication is associated with discharges containing available nitrogen.
- Some pesticides, industrial chemicals, and components of sewage effluent are suspected to interfere with the functioning of the endocrine system, possibly having negative effects on the reproduction and development of aquatic life.

4.5.3 Sewage and some industrial effluent discharges contribute to increased nutrients in Habitats sites and particularly to phosphate levels in watercourses. However, these will not be associated with FOTP interventions. Road and rail schemes can, however, result in pollution (such as runoff of sediment, hydrocarbons and salt spray from de-icing) of aquatic, marine and riverine Habitats Sites during construction and operation, if they occur within close proximity of that site.

4.5.4 Overall, the following Habitats Sites are potentially sensitive to negative changes in water quality and are taken forward into screening:

- Epping Forest SAC, due to its wet heathland qualifying feature
- Lee Valley SPA/Ramsar due to its wetland features

4.6 Water Quantity, Level and Flow

4.6.1 The water level, its flow rates and the mixing conditions are important determinants of the condition of European sites and associated qualifying features. Hydrological processes are critical in influencing habitat characteristics in wetlands, terrestrial systems with hydrological associations (e.g., wet heath), and coastal waters, including current velocity, water depth, dissolved oxygen levels, salinity, and water temperature. In turn, these parameters determine the short- and long-term viability of plant and animal species, as well as overall ecosystem composition.

4.6.2 Reduced flow as a result of abstraction, in rivers and connected water-dependent ecosystems, can have significant ecological effects. Droughts (ranging in their magnitude from flow reduction to a complete loss of surface water) have both direct and indirect effects on dependent floral and faunal communities. For example, the unique nature of wetlands combines shallow water with conditions ideal for the growth of organisms at the base of food webs, which feed many species of birds, mammals, fish, and amphibians.

4.6.3 Maintaining a steady water supply is of critical importance for many hydrologically dependent SPA, SAC and Ramsar sites. For example, in many wetlands, winter flooding is essential for sustaining a variety of foraging habitats for SPA / Ramsar wader and waterbird species. However, different species

vary in their requirements for specific water levels. Splash and/or shallow flooding is required to provide suitable feeding areas and roosting sites for ducks and waders. In contrast, deeper flooding is essential to provide foraging habitats for Bewick's swans and other ducks.

4.6.4 Wetland habitats rely on hydrological connections with other surface waters, such as rivers, streams and lakes. A constant water supply is fundamental to maintaining the ecological integrity of sites. However, while the natural fluctuation of water levels within narrow limits is desirable, excess or too little water supply might cause the water level to be outside of the required range of qualifying birds, invertebrates or plant species. This might lead to the loss of the structure and functioning of wetland habitats. There are two mechanisms through which urban development might negatively affect the water level in Habitats Sites:

- The supply of new housing with potable water will require increased abstraction of water from surface water and groundwater bodies. Depending on the level of water stress in the geographic region, this may reduce the water levels in Habitats Sites sharing the same catchment.
- The proliferation of impermeable surfaces in urban areas increases the volume and speed of surface water runoff. As traditional drainage systems often cannot cope with the volume of stormwater, sewer overflows are designed to discharge excess water directly into watercourses. Often, this pluvial flooding results in downstream inundation of watercourses and the potential flooding of wetland habitats.

4.6.5 Overall, the following Habitats Sites are potentially sensitive to changes in water quantity, level and flow and are taken forward into screening:

- Epping Forest SAC due to its wet heathland qualifying feature
- Lee Valley SPA/Ramsar due to its wetland features

5. Screening for Likely Significant Effects

5.1 Atmospheric Pollution (Nitrogen Deposition)

Screening Methodology

5.1.1 Habitats Sites have initially been screened for LSE on the basis of:

- Proximity to (within 200m of) a major road
- Distance of Habitats Site from the HPLA when compared to the average trip distance

5.1.2 As described in Section 4.2, nitrogen deposition and other air quality impacts of significance, with the potential to impact habitats and species, occurs on land within 200m of a major road. Habitats Sites with no major road within 200m are screened out for this pathway.

5.1.3 Data from the 2021 Census⁷¹ indicates that the majority (nearly 70%) of people in employment in the UK travel less than 10 km to work, and the remainder will generally have dispersed across the network by that distance. Habitats Sites are screened out beyond this distance from the HPLA.

Chiltern Beechwoods SAC

5.1.4 The Chiltern Beechwoods SAC (specifically Ashridge Commons & Woods SSSI) is bisected by the B4506, and there is therefore a road within 200m of the SAC. However, this is a B road and there is no

⁷¹ Travel to Work: Census 2021 available at [Travel to work, England and Wales - Office for National Statistics](https://www.gov.uk/government/statistics/travel-to-work-census-2021) [Accessed 09/02/2026]

reason for it to be a journey to work route for residents of Hertsmere since it does not connect settlements that could not be reached from the borough more directly using major roads.

- 5.1.5 The Chiltern Beechwoods SAC is extensive, covering a number of locations. At its closest point, the SAC is just over 15 km from the HLP boundary, with the section traversed by the B4506 being 17km away at its closest and is therefore also beyond the distance at which impacts are likely to occur from the Hertsmere Local Plan.

- 5.1.6 It is therefore concluded that the HLP will not result in LSE on Chiltern Beechwoods SAC through the impact pathway of atmospheric pollution, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Epping Forest SAC

- 5.1.7 The Epping Forest SAC is bisected by a number of "A" roads, although given their location none would constitute journey to work routes for residents of Hertsmere. The SAC is located within 200m of the M25.

- 5.1.8 The Epping Forest SAC is approximately 11.5 km east of the HLP boundary from the boundary of the HLP and therefore beyond the distance where impacts are likely to occur from the Local Plan as traffic can be expected to have dispersed across the network by this distance. Furthermore, the most likely route for taking commuters from Hertsmere to the SAC is the M25, which at the point it lies within 200m of the SAC is over 17km from the Hertsmere boundary and passes through the Bell Common Tunnel, designed to protect Epping Forest SAC by taking traffic under it.

- 5.1.9 It can therefore be concluded that the HLP will not result in LSE on Epping Forest SAC through the impact pathway of atmospheric pollution, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Lee Valley SPA /Ramsar

- 5.1.10 The northernmost parts of the SPA/Ramsar are approximately 50m from the A414. Southern parts of the SPA/Ramsar are within 200m of the A503 and A1055.

- 5.1.11 Natural England's Site Improvement Plan (SIP) indicates that air pollution in the form of nitrogen deposition is a threat to the qualifying species, bittern. Note that bittern is not a qualifying species of the Ramsar and therefore no further consideration of the Ramsar is given in this assessment.

- 5.1.12 The Lee Valley SPA covers a number of sites over approximately 25km on a north/south axis. Areas in close proximity to major roads are localised to the Rye Meads SSSI in the north and the Walthamstow Reservoirs SSSI in the south. Both of these SSSIs are more than 12km from the HLP and therefore beyond the distance where impacts are likely to occur. Moreover, there is no reason for roads within 200m of the SPA to be journey to work routes for residents of Hertsmere since they do not connect settlements that could not be reached from the borough more directly using other roads.

- 5.1.13 It can therefore be concluded that the HLP will not result in LSE on Lee Valley SPA / Ramsar through the impact pathway of atmospheric pollution, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Wormley-Hoddesdonpark Woods SAC

- 5.1.14 The SAC is within 200m of the A10, a major road. The point at which the road comes into proximity with the SAC is approximately 11 km distant and therefore beyond the distance where impacts are likely to occur and traffic arriving from Hertsmere is expected to have dispersed across the network. Moreover, only a very small part of the SAC (constituting approximately 0.01% of the SAC approximately 500m²) lies within 200m of the A10 and much of this area is a track/path/arable field boundary. The closest point of the SAC is situated on the edge of the 200m zone, being no closer to the A10 than 190m at any point.

- 5.1.15 It can therefore be concluded that the HLP will not result in LSE on Wormley-Hoddesdonpark Woods SAC through the impact pathway of atmospheric pollution, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

5.2 Loss of Functionally Linked Habitat

Chiltern Beechwoods SAC

- 5.2.1 The stag beetle is a qualifying feature of the Chiltern Beechwoods SAC. Research⁷² indicates that stag beetles disperse from their hatching sites. For the continued success (and range expansion) of the species, therefore, functionally linked habitat can be important. However, dispersal is to a maximum range of 1km, whereas the SAC is approximately 15km from the HLP. Land within the HLP cannot be reasonably deduced to be functionally linked to the SAC.
- 5.2.2 It can therefore be concluded that the HLP will not result in LSE on Chiltern Beechwoods SAC through the impact pathway of functionally linked land, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Epping Forest SAC

- 5.2.3 The stag beetle is a qualifying feature of the Epping Forest SAC. Research⁷³ indicates that stag beetles disperse from their hatching sites. For the continued success (and range expansion) of the species, therefore, functionally linked habitat can be important. However, dispersal is to a maximum range of 1km, whereas the SAC is approximately 11.5km from the HLP. Land within the HLP cannot be reasonably deduced to be functionally linked to the SAC.
- 5.2.4 It can therefore be concluded that the HLP will not result in LSE on Epping Forest SAC through the impact pathway of functionally linked land, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Lee Valley SPA/Ramsar

- 5.2.5 The qualifying species for the Lee Valley Sites are bittern (SPA only), gadwall and shoveler. Although shovelers and gadwalls may occasionally breed away from the water, the designation is for wintering, not breeding, birds.
- 5.2.6 Natural England's Impact Risk Zones for Sites of Special Scientific Interest⁷⁴ concludes a maximum foraging distance of 500m for gadwall and other dabbling ducks.
- 5.2.7 Lee Valley SPA and Ramsar sites are over 12km from the HLP.
- 5.2.8 It can therefore be concluded that the HLP will not result in LSE on Lee Valley SPA/Ramsar through the impact pathway of functionally linked land, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

5.3 Recreational Pressure

Chiltern Beechwoods SAC

- 5.3.1 The Chiltern Beechwoods SAC is extensive, covering a number of locations. Within the SAC, the Ashridge Commons and Woods SSSI is vulnerable to recreational pressure, and the Recreational Pressure Mitigation Strategy for Ashridge Commons and Woods Site of Special Scientific Interest⁷⁵ identifies the recreational zone of influence for the SSSI as 12.6km.

⁷² Thomaes, A., Dhont, P., Dekeukeleire, D. and Vandekerckhove, K. (2018), Dispersal behaviour of female stag beetles (*Lucanus cervus*) in a mosaic landscape: when should I stay and where should I go. *Insect Conserv Divers*, 11: 523-533. Available at: <https://doi.org/10.1111/icad.12325>

⁷³ Thomaes, A., Dhont, P., Dekeukeleire, D. and Vandekerckhove, K. (2018), Dispersal behaviour of female stag beetles (*Lucanus cervus*) in a mosaic landscape: when should I stay and where should I go. *Insect Conserv Divers*, 11: 523-533. Available at: <https://doi.org/10.1111/icad.12325>

⁷⁴ Knight, M (2019) Impact Risk Zones Guidance Summary Sites of Special Scientific Interest Notified for Birds Version 1.1. Natural England

⁷⁵ Available at: https://www.buckinghamshire.gov.uk/documents/34230/Chiltern_Beechwoods_SAC_Mitigation_Strategy_-_August_2024_Version_2_accessibleAH.pdf [Accessed [28/01/2026]]

- 5.3.2 At its closest point, the SAC is just over 15km from the boundary of the HLP and therefore, no new residential dwellings will be built within the catchment zone as a result of the HLP.
- 5.3.3 It is therefore concluded that the HLP will not result in LSE on Chiltern Beechwoods SAC through the impact pathway of recreational pressure, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Epping Forest SAC

- 5.3.4 The Epping Forest SAC is approximately 11.5km east of the HLP. Based on visitor survey data, the Enfield Epping Forest SAC Mitigation Strategy⁷⁶ identifies the recreational zone of influence as 6.2km.
- 5.3.5 Therefore, no new residential dwellings will be built within the catchment zone as a result of the HLP.
- 5.3.6 It is therefore concluded that the HLP will not result in LSE on Epping Forest SAC through the impact pathway of recreational pressure, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Lee Valley SPA/Ramsar

- 5.3.7 There is no specific recreational zone of impact for the Lee Valley SPA; however, 7km is used in this HRA based on this being a commonly used recreational catchment for other inland European sites, and as the catchment applied in HRAs of adopted Local Plans around the SPA/Ramsar site such as Epping Forest District Local Plan⁷⁷
- 5.3.8 The Lee Valley SPA/Ramsar is approximately 10km southeast of the HLP and therefore no new residential dwellings will be built within the catchment zone as a result of the HLP.
- 5.3.9 It is therefore concluded that the HLP will not result in LSE on Lee Valley SPA / Ramsar through the impact pathway of recreational pressure, either alone or in combination with other plans, and the sites are screened out for AA in respect of this pathway.

Wormley-Hoddesdonpark Woods SAC

- 5.3.10 The SAC is located approximately 4.5km northwest of the Hertsmere district boundary. There is no recreational impact zone specifically defined for the SAC; however, 7km is used in this HRA based on the recreational catchment defined by Wealden Council for Ashdown Forest SAC/SPA, which is a woodland SAC that has a probably greater recreational draw than Wormley Hoddesdonpark Woods SAC⁷⁸
- 5.3.11 The following HLP policies provides for residential development within the Zone of Influence (Zoi) for this SAC.
- Policy HPBA1 Potters Bar Town Centres
- 5.3.12 The specific residential site allocations proposed within the Zoi are:
- HPBA SA1 (588 dwellings)
 - HPBA SA2 (369 dwellings)
 - HPBA SA3 (128 dwellings)
 - HPBA SA4 (98 dwellings)
 - HPBA SA5 (58 dwellings)
 - HPBA SA6 (119 dwellings)

⁷⁶ Available at: https://www.enfield.gov.uk/_data/assets/pdf_file/0013/53104/Enfield-recreation-mitigation-strategy-2023-Planning.pdf [Accessed [28/01/2026]]

⁷⁷ Available at: [Microsoft Word - Draft final Epping Forest Local Plan HRA 2022.docx](#) [Accessed [28/01/2026]]

⁷⁸ Available at: <https://www.wealden.gov.uk/UploadedFiles/11.-Ashdown-Forest-SPA-Mitigation-Zone.pdf> [Accessed [28/01/2026]]

- HPBA SA7 (21 dwellings)
 - HPBA SA8 (7 dwellings)
 - HPBA SA9 (16 dwellings)
 - HPBA SA11 (1875 dwellings)
 - HPBA SA12 (260 dwellings)
 - HPBA SA13 (400 dwellings)
 - HPBA SA14 (82 dwellings)
- 5.3.13 The sum of dwellings from these proposed site allocations, within the ZoI for the SAC is 4,021 dwellings.
- 5.3.14 Natural England's Site Improvement Plan (SIP) indicates that the site is heavily used by the public for recreational purposes. However, it also indicates that recreational activities are generally well managed. Sensitive management of access points and routes by the site's main owners has been largely successful in mitigating the potential adverse effects of this high level of use. As such, general recreational pressure is not identified in the Site Improvement Plan as a current or future obstacle to achieving or maintaining favourable conservation status or to preserving the integrity of the SAC. Rather, continued monitoring is proposed to identify any changes in patterns of use or impact.
- 5.3.15 Recreation is actively promoted on this site and is concentrated on well-established paths. Most of the complex is covered by a High Forest Zone Plan (Hertfordshire County Council 1996), which sets out a framework for woodland management across the whole area. It aims to restore a varied age structure and natural stand types through sustainable forestry.
- 5.3.16 The site is owned and managed by the Woodland Trust and the Wormley Wood and Nut Wood Management Plan (2017 – 2022)⁷⁹. The management plan makes it clear that there is a good network of hard surfaced trails meaning off-track access is much less likely to be an issue, and confirms recreational activity is already well managed. The plan includes the following long-term policy statement, indicating a continuance of previous policies to manage visitor access to protect the qualifying features of the SAC:
- "The Trust's corporate objective of increasing people's awareness and enjoyment of woodland is furthered by the maintenance of the path infrastructure and provision of NNR-wide information boards. Work will continue to improve and maintain the visitor and management access to the site in order to provide welcoming all-weather low-impact access to much of the wood, this will include mowing, scalloping, ride widening, renewal of drainage ditches and old tracks, and maintenance of footbridges, gates, and other Trust furniture, as well as the removal of cluttered, obsolete, or damaged signs and items."*
- 5.3.17 Impacts in combination must also be considered. The SAC is located within the borough of Broxbourne. The HRA⁸⁰ for the Broxbourne Local Plan (2018 – 2033) determined that this impact pathway could be screened out alone and in combination with other projects and plans.
- 5.3.18 Based on existing management of recreational activity, the conclusions of the Broxbourne Local Plan, and the existing practices for managing recreational use of the SAC, there is no basis to conclude that the above increases would result in an LSE.
- 5.3.19 Eleven policies provide for development which has the potential to increase permanent or temporary residency, but which do not specify locations for the development. The developments may therefore be proposed within the 7km recreational impact zone. These policies are:
- HQD8 Infill and Backland sites, Garden Land and Amenity Areas
 - H1 Meeting Hertsmere's Housing Need

⁷⁹ Available at <https://www.woodlandtrust.org.uk/media/46691/4067-wormley-wood-and-nut-wood.pdf> [Accessed 24/03/2026]

⁸⁰ Available at: <https://www.broxbourne.gov.uk/downloads/file/913/ev1-habitats-regulations-assessment> [Accessed [28/01/2025]

- Policy H2 Hertsmere’s Urban Extensions (that are not site allocations)
- Policy H3 Optimising Delivery from Small Urban Sites
- Policy H5 Accommodation for Older People
- Policy H6 Supported and Specialised Accommodation
- Policy H7 Housing with Shared Facilities/ Homes in Multiple Occupation
- H9 Gypsy and Traveller Accommodation
- H10 New Homes in the Countryside/ Green Belt
- EC1 Meeting Hertsmere’s Economic Needs
- EC8 Co-Located/ Mixed-use Employment Sites/ Designations
- EC21 Visitor Accommodation/ Hotels

5.3.20 Any development brought forward under these policies will need to comply with “Policy GI4 Biodiversity and Access to Nature” which requires an ecological assessment to accompany proposals where they are likely to impact on designated nature sites.

5.3.21 Notwithstanding the above analysis for known site allocations, it is recommended that this policy be amended to explicitly require an HRA as part of that environmental assessment.

5.3.22 It can therefore be concluded that the HLP will not result in LSE on Wormley-Hoddesdonpark Woods SAC through the impact pathway of recreational pressure, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

5.4 Water Quality

Epping Forest SAC

5.4.1 The Site Improvement Plan⁸¹ for Epping Forest SAC indicates that the potential threat from water quality to the SAC arises from runoff from roads. As discussed in the screening for Air Pollution, the likely pathway is through commuting traffic on the M25, which goes through a tunnel at the point of proximity to the SAC, thereby protecting the SAC from surface water runoff.

5.4.2 The Epping Forest SAC is bisected by a number of “A” roads and is within 200m of the M25.

5.4.3 The Epping Forest SAC is approximately 11.5 km east of the HLP. from the boundary of the HLP and therefore within the average car/van journey distance of 13.2 km.

5.4.4 It can therefore be concluded that the HLP will not result in LSE on Epping Forest SAC through the impact pathway of water quality, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Lee Valley SPA/Ramsar

5.4.5 Lee Valley SPA and Ramsar are susceptible to water quality changes. The sites are in the Rye Meads WTW. Effluent discharges from Rye Meads Water Treatment Works (WTW) into Tollhouse Stream, and the stream flows through parts of the Habitats Sites.

5.4.6 The Hertsmere District is, however, outside of the catchment for the Rye Meads WTW and is not hydrologically connected to this Habitats Site⁸².

⁸¹ Available at: <https://publications.naturalengland.org.uk/file/5732004727881728> [Accessed 06/02/2026]

⁸² Thames Water Strategic Catchment Plan available at: <https://www.thameswater.co.uk/media-library/lb2inaoq/hertfordshire-catchment-strategic-plan.pdf> [Accessed: 06/02/2026]

- 5.4.7 It can therefore be concluded that the HLP will not result in LSE on the Lee Valley SPA / Ramsar through the impact pathway of water quality, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

5.5 Water Quantity, Level and Flow

Epping Forest SAC

- 5.5.1 The Site Improvement Plan⁸³ for Epping Forest SAC indicates that the potential threat is inappropriate water levels. The SAC is within the “Lee Lower Rivers and Lakes” catchment.
- 5.5.2 The HPLA is in the Colne management catchment and is therefore not hydrologically connected to the Epping Forest SAC.
- 5.5.3 It can therefore be concluded that the HLP will not result in LSE on the Epping Forest SAC through the impact pathway of water quantity, level and flow, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Lee Valley SPA/Ramsar

- 5.5.4 Lee Valley SPA and Ramsar are susceptible to hydrology changes. These Habitats Sites are within the “Lee Lower Rivers and Lakes” catchment.
- 5.5.5 The HPLA is in the Colne management catchment and is therefore not hydrologically connected to the Lee Valley SPA/and Ramsar.
- 5.5.6 It can therefore be concluded that the HLP will not result in LSE on the Lee Valley SPA / Ramsar through the impact pathway of water quantity, level and flow, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

6. Conclusions and Recommendations

- 6.1.1 The Plans, policies and site allocations of the HLP were assessed for impact on Habitats sites, both alone and in combination (with other local plans and projects, as listed).
- 6.1.2 No Habitats Sites are within the HLP area, and therefore consideration was given to those Habitats Sites within 15km of the site, and where there was a potential impact pathway by which LSE may occur.
- 6.1.3 All impact pathways were screened out at the first stage and not taken forward for Appropriate Assessment. Since they were screened out because there is effectively no pathway of impact linking the SACs or SPA to Hertsmere Borough there will be no likely significant effect alone or in combination with other projects or plans and no detailed discussion of in combination effects is required.
- 6.1.4 was Although not mitigation, it was recommended that policy “GI4 Biodiversity and Access to Nature” be amended to explicitly require an HRA as part of that environmental assessment.

⁸³ Available at: <https://publications.naturalengland.org.uk/file/5732004727881728> [Accessed 06/02/2026]

Appendix A Figures

Appendix B LSE Screening of Site Allocations

Table 3. Screening of Site Allocations

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chiltern Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonp ark Woods SAC (km)	Screening outcome
HBA SA1 Borehamwood Town Centre Retail Park	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town centre uses (at ground and lower levels) and residential above (with vertical intensification). Public realm and open space.	Residential: 501 dwellings	23	19	17	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA2 The Point Borehamwood	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town centre uses (at ground and lower levels) and residential above (with vertical intensification)	Residential: 51 dwellings	23	19	17	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA3 Tesco Foodstore, Elstree Way, Borehamwood	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 468 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites..
HBA SA4, HBA SA5 and HBA SA6 Civic Centre Sites, Elstree Way, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure and leisure uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 330 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA7	Urban site; Comprehensive mixed-use redevelopment comprised of sustainable travel network	Residential: 43 dwellings	23	19	17	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chiltern Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonp ark Woods SAC (km)	Screening outcome
Elstree & Borehamwood Railway Station, Borehamwood	infrastructure (at ground level) and residential above (with vertical intensification).						
HBA SA8 Travelodge, Studio Way, Borehamwood	Urban Site; Comprehensive redevelopment comprised of residential, open space and public realm (with vertical intensification).	Residential: 33 dwellings	24	18	16	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA9, HBA SA10 and HBA SA11 Cluster on Elstree Way, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure (at ground level) and residential above (with vertical intensification).	Residential: 137 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA12 Car Park and Office, Theobald Street (south), Borehamwood	Urban Site; Comprehensive redevelopment comprised of residential, main town centre uses (at ground level) and public realm (with vertical intensification).	Residential: 55 dwellings	23	19	17	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA13 McDonald's, Elstree Way, Borehamwood	Urban Site; Comprehensive redevelopment comprised of residential and public realm (with vertical intensification).	Residential: 26 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA14 Leeming Road Local Centre, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of main town centre/ employment uses (at ground level), public realm and residential above (with vertical intensification).	Residential: 71 dwellings (net)	22	19	18	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA15 Imperial Place, Elstree Way, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of main town centre/ employment uses (at ground level), public realm and residential above (with vertical intensification).	Residential: 221 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chiltern Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonp ark Woods SAC (km)	Screening outcome
HBA SA16 Well End Strategic Urban Extension, Borehamwood	Strategic Urban Extension; Comprehensive strategic development, comprised of higher density residential, social/ community infrastructure, open spaces, main town centre and complimentary employment uses.	Residential: 3750 dwellings	22	17	16	12	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites..
		Main Town Centre:					
		Employment Uses:					
			23	16	15	11	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
			24	17	16	12	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA17 Land East of Hartfield Avenue and Fronting onto Barnet Lane, Elstree	Urban extension; Development comprised of higher density residential and open space uses.	Residential: 74 dwellings	24	19	17	15	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA18 Land north of Barnet Lane, Borehamwood	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland).	Residential: 220 dwellings	24	18	18	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA19 Land south of Allum Lane, Elstree,	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained trees, woodland and hedgerows).	Residential: 240 dwellings	23	19	17	15	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA20 The Hertsmere Golf Course	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained trees, woodland and hedgerows).	Residential: 1073 dwellings	22	20	18	15	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA21 Hollywood Court, Borehamwood	Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification).	Residential: 71 dwellings	23	19	17	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chiltern Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonp ark Woods SAC (km)	Screening outcome
HBA SA22 Old Haberdasher's Sports Ground - Croxdale Road, Borehamwood	Urban Site; Comprehensive redevelopment comprised of residential, open space and public realm (with vertical intensification).	Residential: 95 dwellings	23	19	18	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
			23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA23 Director's Arms, Borehamwood	Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification).	Residential: 29 dwellings	24	17	16	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA24 Land North of Allum Lane and East of Watling Street, Elstree	Urban extension; Development comprised of higher density residential and open space uses.	198	23	20	19	15	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA25 Lyndhurst Farm, Green Street, Borehamwood	Urban extension; Development comprised of higher density residential and open space uses.	186	22	13	17	19	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA26 Organ Hall Farm, Theobald Street, Borehamwood	Urban extension; Development comprised of higher density residential and open space uses.	110	20	15	19	20	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBA SA27 Land North of Watford Road and West of High Street, Elstree	Urban extension; Development comprised of higher density residential and open space uses.	141	23	16	18	21	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBCA SA1 Land at Bowman's Cross, Courser's Road, Ridge (Site located to the east of London Colney and north of the	Strategic Site/ New Settlement; comprised of residential, main town centre, employment, open space, social community infrastructure, and infrastructure networks. Inclusive of retained woodland, trees, hedgerows and other natural landscape features.	Residential: At least 500 dwellings Main Town Centre: Employment Uses:	20	17	15	9.4	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chiltern Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonp ark Woods SAC (km)	Screening outcome
M25, which forms its southern boundary)							
HBUSA SA1 Car Park, Kemp Place, Bushey	Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification).	Residential: 10 dwellings	20	25	23	20	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBUSA SA2 Car Dealership, 21 High Road, Bushey	Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification).	Residential: 19 dwellings	21	23	21	20	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBUSA SA3 Car Park, 67 High Road, Bushey	Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification).	Residential: 11 dwellings	21	23	20	20	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBUSA SA4 Land at Little Bushey Lane (west), Bushey	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained hedgerows).	Residential: 280 dwellings	20	23	21	18	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBUSA SA5 Land rear of Farm Way (north), Bushey	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained hedgerows).	Residential: 802 dwellings	19	24	22	19	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBUSA SA6 Land at Elstree Road (south), Bushey	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained hedgerows and woodland).	Residential: 1300 dwellings	21	22	19	18	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBUSA SA7 Bushey Golf and Country Club (Former Bushey Golf Course)	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained hedgerows and woodland).	Residential: 286 dwellings	20	24	24	20	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HBUSA SA8 Bushey Hall Golf Course, Bushey	Urban extension; Development comprised of higher density residential and open space uses	Residential: 350 dwellings	17	25	24	20	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chiltern Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark Woods SAC (km)	Screening outcome
	(inclusive of retained hedgerows and woodland).						
HPBA SA1 Tesco Foodstore, B556, Potters Bar	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 588 dwellings Main Town Centre:	25	14	11	6.2	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it is within the core 7km Zol for this site.
HPBA SA2 Canada Life House 2 - 6 High Street Potters Bar Hertfordshire EN6 5BA	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town employment centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 369 dwellings Main Town Centre:	25	14	11	6	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it is within the core 7km Zol for this site.
HPBA SA3 Sainsbury's Foodstore and car park, Darkes Lane, Potters Bar	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 128 dwellings Main Town Centre:	25	14	11	6.3	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it is within the core 7km Zol for this site.
HPBA SA4 Potters Bar Railway Station Car Park, Darkes Lane, Potters Bar	Strategic Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification)	Residential: 98 dwellings Main Town Centre:	25	14	11	6.7	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it is within the core 7km Zol for this site.
HPBA SA5 11 Darkes Lane, Potters Bar	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town employment centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 58 dwellings Main Town Centre:	25	14	11	6.6	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it is within the core 7km Zol for this site.
HPBA SA6 Bus Garage, High Street, Potters Bar	Urban Site; Comprehensive redevelopment comprised of	Residential: 119 dwellings	27	13	10	5.6	This allocation is screened in for Recreational Disturbance for Wormley-

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chiltern Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark Woods SAC (km)	Screening outcome
	residential uses (with vertical intensification).	Main Town Centre:					Hoddesdonpark Woods SAC as it is within the core 7km Zol for this site.
HPBA SA7 Potters Bar Fire Station, Mutton Ln, Potters Bar EN6 2HF	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure (at ground level) and residential above (with vertical intensification).	Residential: 21 dwellings Main Town Centre:	27	13	11	6.5	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it is within the core 7km Zol for this site.
HPBA SA8 Car Park, A1000, Potters Bar	Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification)	Residential: 7 dwellings	25	14	11	6.3	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it is within the core 7km Zol for this site.
HPBA SA9 Car/ Taxi sales outlet, 226 Mutton Lane, Potters Bar	Urban Site; Comprehensive mixed-use redevelopment comprised of main-town centre uses (at ground level) and residential above (with vertical intensification).	Residential: 16 dwellings	25	14	11	7	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it is within the core 7km Zol for this site.
HPBA SA11 Land at Mutton Lane (north), Potters Bar	Strategic Urban Extension; Comprehensive strategic development, comprised of higher density residential, social/ community infrastructure, open spaces, main town centre uses.	Residential: 1875 dwellings Main Town Centre:	24	15	12	7.5	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HPBA SA12 Land rear of Park Avenue, Potters Bar	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland).	Residential: 260 dwellings	28	14	10	5.4	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it is within the core 7km Zol for this site.
HPBA SA13 Former Potters Bar Golf Course	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland).	Residential: 400 dwellings	25	14	11	6.4	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it is within the core 7km Zol for this site.
HPBA SA14 Dove Lane, Potters Bar	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained trees and hedgerows)	Residential: 82 dwellings	25	14	11	6.3	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it is within the core 7km Zol for this site.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chiltern Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonp ark Woods SAC (km)	Screening outcome
HRA SA1 Land at 205 Watling Street (A5183), Radlett	Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification).	Residential: 9 dwellings	19	22	21	15	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats sites.
HRA SA2 Car Park, Railway Cottages, Radlett	Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification).	Residential: 53 dwellings	19	22	20	15	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats sites.
HRA SA3 Land on Watford Road (north), Radlett	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland and hedgerows).	Residential: 972 dwellings	18	23	21	17	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats sites.
HRA SA4 Land on Watford Road (south), Radlett	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland and hedgerows).	Residential: 450 dwellings	19	23	21	17	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats sites.
HRA SA5 Land South Of Shenley Hill Radlett Hertfordshire	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland and hedgerows).	Residential: 195 dwellings	20	21	20	15	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats sites.
HRA SA6 Home Farm, Radlett	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland and hedgerows).	Residential: 1040 dwellings	19	22	21	16	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats sites.
HRA SA7	Urban Extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland).	Residential: 190	18	23	21	16	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats sites.

Employment Sites

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chiltern Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonp ark Woods SAC (km)	Screening outcome
HEM SA01	Land Southeast of Junction 24 (M25), north of the Ridgeway, Potters Bar		28	12	10	6	
HEM SA02	Land east of South Mimms Services, St Albans Road, South Mimms		24	15	13	8.1	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HEM SA03	Borehamwood Extension		24	17	15	12	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HEM SA04	Extension to Lismirrane Industrial Park		22	21	19	16	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HEM SA05	Land northeast of Elton Way, Bushey, WD25 8HB		18	24	22	18	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats sites.
HEM SA06	The Mecure Hotel and Land to east, Tylers Way, Watford, WD25 8JH		19	24	22		

Source: <Source>

Appendix C LSE Screening of Policies

Table 4. Screening of Policies

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy HQD1 Delivering High Quality Design in Hertsmere	An overarching strategic policy that sets out the requirements for all development to take the design-led approach to delivering growth – to secure sustainable and successful places. It is envisaged that the policy will require development proposals demonstrate an understanding of the site context and respond positively to Hertsmere's local distinctiveness by providing for buildings, spaces and places that reinforce and enhance local character. The policy will include a series of criteria that will require that development proposals respond to local distinctiveness.	This management policy provides quality guidance and controls on all development. It does not in itself lead to any new development. There are no linking impact pathways to Habitats Sites.
Policy HQD2 Inclusive and Welcoming Design	A non-strategic policy that seeks to secure welcoming and inclusive built environment. The policy will require that an Inclusive Design Statement should form a component of a Design and Access Statement. This will be proportionate to the scale of the development being proposed. This should demonstrate how the design of a scheme will contribute to delivering inclusive, accessible, welcoming and secure environments in Hertsmere, addressing disproportionate barriers	This management policy provides quality guidance and controls on all development. It does not in itself lead to any new development. There are no linking impact pathways to Habitats Sites.
Policy HQD3 Public Realm and Connecting Places	This non-strategic policy sets out the requirement for the delivery of public realm through new development, to secure high quality and well-connected public spaces. The policy would seek to integrate new developments within existing settlements, creating connections to existing communities. Where strategic, major, or sensitive developments are proposed, the development proposals will be required to demonstrate how successful placemaking is achieved and indicate compliance with the settlement-specific 'Visions' where relevant.	This management policy provides quality guidance and controls on all development. It does not in itself lead to any new development. There are no linking impact pathways to Habitats Sites.
Policy HQD4 Building Heights	A strategic policy that will be linked to the Council's proposed Spatial Strategy and set out the approach towards tall buildings. This policy will set out: <ul style="list-style-type: none"> • The definition of tall buildings within the Hertsmere context • Identified locations where tall buildings might be considered appropriate • Relevant design parameters in terms of maximum heights and high-quality design. The policy will seek to ensure that efficient use of land within settlement boundaries is achieved, delivering intensification in appropriate locations, while also ensuring that places remain legible, welcoming, inclusive and accessible.	This management policy provides quality guidance and controls on all development. It does not in itself lead to any new development. There are no linking impact pathways to Habitats Sites.
Policy HQD5 Optimising Site Capacity	This strategic policy sets out the Council's ambition to achieve optimal site capacity, specifically in relation to development located within existing settlements. Proposals will be expected to respect the character of the area, while using land supply resources effectively and efficiently to accommodate growth. Optimum capacity will derive through careful consideration of density, uses, transport links, and existing and future infrastructure provisions. It is assumed that the Borough's larger settlements, such as Borehamwood and Potters Bar, will have greater capacity to accommodate higher densities, whereas rural locations will have less capacity.	This management policy provides quality guidance and controls on all development. It does not in itself lead to any new development. There are no linking impact pathways to Habitats Sites.
Policy HQD6 High Quality Housing Design	This non-strategic policy seeks to secure high quality design for new residential developments in the Borough. It will ensure that all new housing is designed to a high-quality standard, responding to the needs	This management policy provides quality guidance and controls on all development. It does not in itself lead to any new

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	<p>of Hertsmere's resident population. The policy will set minimum internal and external space standards, and secure 'tenure neutral' design. It will also set out requirements for internal and external amenity, such as:</p> <ul style="list-style-type: none"> • Daylight & sunlight • Natural ventilation • Outlook • High quality amenity spaces 	development. There are no linking impact pathways to Habitats Sites.
Policy HQD7 Building Alterations and Extensions	This non-strategic policy will seek to secure high-quality design from householder development, and other development that involves alterations and extensions to existing buildings that require consent. The policy will set out key considerations for extensions, alterations and basement developments to ensure that such proposals will make a positive contribution to the local character, particularly on buildings of historic interest, within Conservation Areas, and established residential areas.	This management policy provides quality guidance and controls on all development. It does not in itself lead to any new development. There are no linking impact pathways to Habitats Sites.
Policy HQD8 Infill and Backland sites, Garden Land and Amenity Areas	A non-strategic policy that works in harmony with other policies that focus upon delivery on small sites and seek their efficient use. The policy approach compliments a potential strategic approach to minimise the degrading of the Borough's Green Belt, in terms of securing efficient use of supply. This approach also speaks to diversifying supply/delivery, so that Hertsmere is not solely dependent upon strategic sites for its future housing.	<p>Although precise locations are not specified by this policy it is possible that resultant development will occur within the impact zone of a Habitats site.</p> <p>There is a therefore a potential linking impact pathway of recreational pressure to Wormley-Hoddesdonpark Woods SAC which have been screened in.</p>
Policy HQD9 Shopfront Design	A non-strategic policy that seeks to secure high quality design for ground floor main town centre and/or commercial uses. Proposals will be expected to reflect local distinctiveness, reinforcing a sense of place, and ensure legibility. The policy will relate to new shopfront and alterations to existing ones, ensuring that development does not result in adverse impact on character, amenity or public safety.	This management policy provides quality guidance and controls on all development. It does not in itself lead to any new development. There are no linking impact pathways to Habitats Sites.
Policy HQD10 Outdoor Advertisements, Digital Displays and Hoarding	A non-strategic policy that seeks to manage proposals for outdoor advertisement, digital displays and hoardings. Proposals that are beyond the scope of permitted development will be evaluated based on design characteristics, and any potential impact on amenity and public safety. This policy will also seek to control illuminated advertisement within Conservation Areas.	This management policy provides quality guidance and controls on all development. It does not in itself lead to any new development. There are no linking impact pathways to Habitats Sites.
Policy HE1 Hertsmere's Historic Environment	A strategic policy that provides an overarching approach towards Hertsmere's heritage assets and their role within the spatial strategy, in continuing to contribute towards the Borough's character and distinctiveness.	This is a management policy designed to protect the historic environment, there are no linking impact pathways to Habitats Sites.
Policy HE2 Designated Heritage Assets	This strategic policy will set out the Council's approach towards the management of heritage assets, and their contribution towards Hertsmere's future growth. The policy will be subdivided into sections in relation to conservation areas, listed buildings, registered parks and gardens and scheduled monuments and will be accompanied by a map indicating their location.	This is a management policy designed to protect heritage assets, there are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy HE3 Non-Designated Heritage Assets	This strategic policy sets out the approach towards the Borough's non-designated heritage assets in relation to their management, and their contribution towards Hertsmere's future growth. This policy will be accompanied by a map identifying their location. The policy also provides an opportunity to set out how future non-designated heritage assets will be identified and "designated".	This is a management policy designed to protect heritage assets, there are no linking impact pathways to Habitats Sites.
Policy H1 Meeting Hertsmere's Housing Need	A strategic policy that sets out what Hertsmere's future housing need is and how the subsequent local plan policies, settlement and place policies, and site allocations will meet those needs in full. The policy could consider how the Council will discharge its responsibilities in the process – i.e. maintaining a rolling 5YHLS, granting consents in a timely manner, and facilitating high quality growth that meets needs. In return, the development industry can be reasonably expected and held to account to deliver consented schemes in a timely manner, at an appropriate speed that ensures that consents positively contribute towards the HDT measurement. The Council will deploy those measures available to local planning authorities to ensure that consented schemes are delivered as anticipated in a timely manner. Failure to meet those reasonable expectations could be considered as material consideration in future proposals.	Although precise locations are not specified by this policy it is possible that resultant development will occur within the impact zone of a Habitats site. There is a therefore a potential linking impact pathway of recreational pressure to Wormley-Hoddesdonpark Woods SAC which have been screened in.
Policy H2 Hertsmere's Urban Extensions (that are not site allocations)	This possible strategic policy could set out the Council's overarching approach towards the Borough's strategic urban extensions, resulting in 'major development' that would be extending existing urban areas. This could build-up the spatial strategy, stating that the new Local Plan has identified a specific selection of strategic urban extensions that will be developed/ delivered efficiently (in terms of yield) to make a positive and timely contribution towards meeting need. The approach speaks to the number of sites, and the intensity that they are developed as part of the mechanism to minimise the impact on the wider strategic extent of the Green Belt to be fixed in permanence.	Although precise locations are not specified by this policy it is possible that resultant development will occur within the impact zone of a Habitats site. There is a therefore a potential linking impact pathway of recreational pressure to Wormley-Hoddesdonpark Woods SAC which have been screened in.
Policy H3 Optimising Delivery from Small Urban Sites	A new strategic policy that seeks to optimise the efficient delivery of small sites, ostensibly within the four designated settlements and smaller settlements. The policy seeks to secure the delivery of high-quality development on these sites. For clarification, it relates to the delivery of new homes not extensions to existing properties. The policy will work alongside complementary approaches that secure design quality. This source will further diversify supply across the Borough and ensure that there is not a reliance upon large strategic sites for delivery. The policy will set out how SME developers, on small sites, will contribute towards making the step-change in delivery – and how the Council will help them do so. The policy will also seek to minimise the need to release Green Belt land to deliver the Borough's housing need.	Although precise locations are not specified by this policy it is possible that resultant development will occur within the impact zone of a Habitats site. There is a therefore a potential linking impact pathway of recreational pressure to Wormley-Hoddesdonpark woods SAC which have been screened in.
Policy H4 Delivering Genuinely Affordable Housing	This strategic policy sets out the scale of affordable housing need across the Borough and how it will be met going forward. Namely, the percentage of new affordable homes being secured through new development. This will need to recognise and reflect development viability, identifying what percentage can be supported without endangering delivery of new homes.	This is a management policy concerned with the management of provision to meet Hertsmere's housing need. There are no geographic details or quantum in delivery of new housing (which are assessed via the proposed housing allocations). There are no linking impact pathways to Habitats Sites.
Policy H5 Accommodation for Older People	A non-strategic policy that sets out the approach to the delivery of accommodation for older people. This policy will set the overall target, or percentage of provision as established against the overall housing need. The policy will recognise that specialised accommodation for older people forms part of a wider diverse mix of typologies, which includes conventional housing that has been adapted to meet their needs.	Although precise locations are not specified by this policy it is possible that resultant development will occur within the impact zone of a Habitats site.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		There is a therefore a potential linking impact pathway of recreational pressure to Wormley-Hoddesdonpark woods SAC which have been screened in.
Policy H6 Supported and Specialised Accommodation	A non-strategic policy that seeks to secure supported and other forms of specialised accommodation that offers respite and provision of care or support for individuals with distinct needs, particularly those from more vulnerable groups, whether for temporary stays or longer-term periods. This will be subject to supporting evidence identified through the Local Plan supporting studies.	Although precise locations are not specified by this policy it is possible that resultant development will occur within the impact zone of a Habitats site. There is a therefore a potential linking impact pathway of recreational pressure to Wormley-Hoddesdonpark woods SAC which have been screened in.
Policy H7 Housing with Shared Facilities/ Homes in Multiple Occupation	This non-strategic policy provides an opportunity for the new Local Plan to manage HMO provision, and other forms of shared housing (co-living) that may manifest itself in Hertsmere during the life of the Plan. Such forms of housing offer a degree of flexible housing options, especially considering in the context of Hertsmere's housing delivery.	Although precise locations are not specified by this policy it is possible that resultant development will occur within the impact zone of a Habitats site. There is a therefore a potential linking impact pathway of recreational pressure to Wormley-Hoddesdonpark woods SAC which have been screened in.
Policy H8 Self and Custom Build Housing	A non-strategic policy that sets out how the Council will identify need for this highly specialised area of housing, by setting out the monitoring process through the self and custom build register, while also aligning such housing provision with the requirements of the CIL regime. As such, self-builders will be expected to satisfy the requirements of the exemption process.	This is a management policy concerned with the management of provision to meet Hertsmere's housing need. There are no geographic details or quantum in delivery of new housing (which are assessed via the proposed housing allocations). There are no linking impact pathways to Habitats Sites.
Policy H9 Gypsy and Traveller Accommodation	This non-strategic policy sets out the Council's approach towards meeting Gypsy and Traveller Accommodation need. The policy will set out the target, and which period(s) that it will cover, while also setting out how it relates to national requirements for meeting the needs of the community. The scale and nature of need is assessed through an up-to-date Gypsy & Traveller Accommodation Assessment.	Although precise locations are not specified by this policy it is possible that resultant development will occur within the impact zone of a Habitats site. There is a therefore a potential linking impact pathway of recreational pressure to Wormley-Hoddesdonpark woods SAC which have been screened in.
Policy H10 New Homes in the Countryside/ Green Belt	This non-strategic policy will relate to speculative small-scale proposals for new homes across the wider Green Belt. Speculative development in such locations will only be supported where proposals can demonstrably delivery additional new homes in a timely manner that respond to the Borough's Housing Delivery Test measurement. In those cases, the Council may consent schemes that demonstrably meet identified needs but will judiciously monitor their timely delivery. Schemes that fail to delivery in a timely manner, and expire, will need to robustly demonstrate that they are genuinely deliverable and will meaningfully contribute towards	Although precise locations are not specified by this policy it is possible that resultant development will occur within the impact zone of a Habitats site. There is a therefore a potential linking impact pathway of recreational pressure to Wormley-Hoddesdonpark woods SAC which have been screened in.
Policy EC1 Meeting Hertsmere's Economic Needs	Floorspace targets that will meet future needs will be split into the employment uses delivered through Use Classes B2, B8 and Class E (g) (i) (ii) and (iii)20. These will be identified and confirmed through Document E4 – Economic Study. Employment priorities are:	Although precise locations are not specified by this policy it is possible that resultant development will occur. However there are no locations within the HLPAs which are within the zone of impact for Habitats sites for relevant impact pathways.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	<ul style="list-style-type: none"> Maintaining Hertsmere's key role in the international film and television industry; Meeting the need for future B8 logistic uses and ensuring that complement wider demands generated by businesses in the Greater London area; Secure an improved understanding of the role and future need for data centres within London and East of England Regions; Meeting settlement-specific, place-focused needs, which may be ancillary/ complementary to the film industry. 	
Policy EC2 Hertsmere's Employment Land Hierarchy	<p>A strategic policy that sets out an employment land hierarchy for the Borough. It will:</p> <ul style="list-style-type: none"> identify and map the key sites within the hierarchy, including their relationship with the strategic highway network. set out the forecast need for employment land across the borough, broken down by Class E(g) office and light industrial, Class B2 industrial, Class B8 storage and distribution, and related Sui Generis uses. be used as a basis for decision-taking in terms of how the identified need will be met. 	<p>This is a management policy concerned with the management of floorspace allocated for employment uses. There are no geographic details or quantum of new floorspace for economic use (which are assessed via the proposed economic allocations). There are no linking impact pathways to Habitats Sites.</p>
Policy EC3 Delivering High Quality Employment Sites and Workspaces	<p>This non-strategic policy seeks to secure high quality workspaces that respond to and meet the Borough's identified employment needs. Criteria will be based on the available evidence in Document E4 Economy Study [LINK] and viability tested to ensure policy requirements do not compromise delivery of new workspaces. The policy will seek to secure design-led interventions that are appropriate and proportionate to the scale and nature of employment workspace being proposed.</p> <p>The policy will require the following:</p> <ul style="list-style-type: none"> basic specification, including fitting out buildings ready for use including digital connectivity, toilets, kitchens etc; meeting environmental impact, energy use and carbon emissions reduction requirements; ensuring that factors such as biodiversity net gain, urban greening, SuDS and public realm are considered at the earliest stage of the development process; and provision of flexible spaces for SMEs and startups within larger developments. 	<p>This is a management policy concerned with the management of floorspace allocated for employment uses. There are no geographic details or quantum of new floorspace for economic use (which are assessed via the proposed economic allocations). There are no linking impact pathways to Habitats Sites.</p>
Policy EC4 Affordable Workspace	<p>This strategic policy seeks to secure an appropriate portion of affordable workspace from larger employment schemes, in line with the Council's evidence base, as set out under Document E4 Economy Study [LINK] which demonstrates a clear need for this permission. It will include a formula for calculating payments in-lieu for off-site provision where provision cannot be delivered on site. The policy will be viability tested to ensure that it does not endanger the delivery of employment land.</p>	<p>This is a management policy concerned with the management of floorspace allocated for employment uses. There are no geographic details or quantum of new floorspace for economic use (which are assessed via the proposed economic allocations). There are no linking impact pathways to Habitats Sites.</p>
Policy EC5 Strategic Level Employment Sites/ Designations	<p>This non-strategic policy will address strategic employment sites that serve a need wider than Hertsmere alone. Sites will be identified on a policies map and may include:</p> <ul style="list-style-type: none"> employment uses associated with the film and television industry (e.g. Sky Elstree) alongside existing large employment areas like Centennial Park, Elstree and Elstree Way, Borehamwood. other large scale B8 storage and logistics, data centres; and other strategic employment uses accessed or associated directly with the strategic highway network. 	<p>Although precise locations are not specified by this policy it is possible that resultant development will occur. However there are no locations within the HLPAs which are within the zone of impact for Habitats sites for relevant impact pathways.</p>

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy EC6 Local Level Employment Sites/ Designations	<p>A non-strategic policy that addresses the Main Employment Areas and Locally Significant Employment Sites identified in Policy EC2. Sites will be identified on a policies map.</p> <p>Development in these areas will:</p> <ul style="list-style-type: none"> • meet local need for Class E(g) office and light industrial, Class B industrial, Class B8 storage and distribution, and related Sui Generis uses, in line with Strategic Policy EC1; • maintain the ability of the designated area to accommodate industrial and commercial land uses by resisting the introduction of main town centre and residential uses; • maintain the strategic position of the employment site within the Hierarchy by resisting very large warehousing and similar uses which would be better placed within Strategic Level Employment Sites; and • potentially encourage uses that are ancillary to strategic employment uses, where these are complimentary to and do not undermine the integrity and function of the employment area, including but not limited to businesses that support the film industry (props, stage sets etc.). <p>Any release of vacant land for uses other than employment will be exceptional and must be supported by robust evidence.</p>	<p>Although precise locations are not specified by this policy it is possible that resultant development will occur. However there are no locations within the HPLA which are within the zone of impact for Habitats sites for relevant impact pathways.</p>
Policy EC7 Rural Employment Areas	<p>This non-strategic policy would seek to ensure that proposals within designated Rural Employment Areas identified in Policy EC2 and identified on a policies map will be:</p> <ul style="list-style-type: none"> • in accordance with national and local green belt policy • ancillary to an existing or approved employment use; and • compatible with the local highway network. <p>Any release of vacant land for uses other than employment will be exceptional and must be supported by robust evidence.</p>	<p>Although precise locations are not specified by this policy it is possible that resultant development will occur. However there are no locations within the HPLA which are within the zone of impact for Habitats sites for relevant impact pathways.</p>
Policy EC8 Co-Located/ Mixed-use Employment Sites/ Designations	<p>A non-strategic policy that speaks to mixed-use sites and proposals that incorporate commercial Class E (g) uses at the ground and lower floors. The policy is related to Policy EC6 in that the new mixed-use employment sites could include Class E (g) components that contribute towards meeting local needs and supporting wider strategic needs – this could be particularly the case in respect of ancillary employment uses that support the film industry and possibly datacentres. The policy will be informed by the Visions for the four settlements, which may identify locations within the settlements where such mixed-use redevelopments could be located.</p>	<p>Although precise locations are not specified by this policy it is possible that resultant development will occur within the impact zone of a Habitats site.</p> <p>There is a therefore a potential linking impact pathway of recreational pressure to Wormley-Hoddesdonpark woods SAC which have been screened in.</p>
Policy EC9 Hertsmere's Non-Designated Employment Sites	<p>This non-strategic policy will relate to all of Hertsmere's non-designated employment sites – inclusive of some basic statistics such as numbers and scale of provision.</p> <p>This policy will consider an approach that seeks to optimise/ maximise industrial employment capacity of the sites. This could be viable and justifiable on the basis of minimising the wider impact on the strategic extent/ permanence of the Green Belt. This approach will seek to secure industrial employment intensification of use on designated sites</p>	<p>This is a management policy concerned with the management of floorspace allocated for employment uses.</p> <p>The policy may refer to individual site allocations – these are assessed in Appendix B.</p> <p>There are no linking impact pathways to Habitats Sites arising directly from this policy.</p>

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy EC10 Workplace Training and Job Opportunities	A non-strategic policy option that supports strategic objectives seeking to make the Borough more attractive, accessible and inclusive to business. Specifically, the policy seeks to support businesses of all sizes and to help promote local skills, focusing on areas of deprivation, education and training. The policy sets out how developer contributions will be utilised to improve opportunities and contribute towards improvements to the wider economy. It will include a formula for calculating financial contributions for workplace training	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy EC11 Town Centres at the Heart of Hertsmere's Communities	Hertsmere's retail market remains healthy and competitive, supported by low vacancy, stable rents, and strong investor interest. The Borough's centres are well positioned for modest growth and for improvements in the retail offer the town centre environments across all the settlements. A strategic policy that links the approach to town centres/ main town centre uses with the spatial strategy. This policy will: <ul style="list-style-type: none"> • make clear that the Borough's town centres are the most sustainable locations for growth of compatible town centre uses, and that optimised levels of growth will be directed to these locations, in line with their position in the Town Centre Hierarchy; • cross-reference the settlement and place (policy) principles; • seek to secure high quality growth that reflects and compliments the distinctive character of each town centre, considering the relevant evidence, including the Retail and Town Centre Study and Visions for the four settlements. 	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy EC12 Hertsmere's Town Centre Network and Hierarchy	This strategic policy translates Policy EC10 into a town centre hierarchy for the Borough, linking with the Spatial Strategy and the Settlement and Place Principles. The policy will: <ul style="list-style-type: none"> • identify Hertsmere's key retail centres on the Policies Map; • support town centres by actively resisting out-of-centre retail proposals, including rural diversification, by applying the sequential test approach; • ensure that new town or district centres avoid detrimental impacts on the role and function of existing town and district centres; • seek to maintain a core of local shopping facilities outside of the town and district centres, primarily within local and neighbourhood centres as defined in the Hierarchy above. Any redevelopment that affects a local centre should include re-provision and preferably enhancement of the shopping offer 	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy EC13 Optimising the Use of Town Centre Land and Floorspace	This strategic policy seeks to optimise the use of main town centre land and floorspace focusing on Class E, Commercial, Business and Service (a) - (g)22. This includes retail, food and drink, financial, professional and other business services, indoor sport and recreation, medical or health services, nurseries, and offices. The policy will: <ul style="list-style-type: none"> • favourably consider mixed use development where it supports the role and function of the centre, is compatible with neighbouring uses, and does not impact negatively on the viability and vitality of the centre; and • favourably consider residential uses that have separate secured access and do not impact on the retail function of the town centre 	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy EC14 Hertsmere's MainTown Centre	<p>This non-strategic policy sets out how the Borough's highest tier of Town Centre serves the Borough and responds to the wider Hertfordshire context, including neighbouring higher-tier centres, specifically St Albans and Watford.</p> <p>Hertsmere's higher tier centre is not seeking to compete with larger neighbouring centres but will continue to have their own role as the Borough grows during the plan period. The policy will set out how these centres will be stratified. This may include designating primary shopping areas (the retail cores) and setting out how complementary main town centre uses outside of those cores (within the centre). The policy will be linked to Policies EC11 and EC12, and to the settlement and place principles, and based on the emerging Local Plan's technical evidence base – Document E5 Retail and Town Centre Uses Study</p> <p>The policy will also speak to the Sequential and Impact Tests (including possibly setting a Local Floorspace Impact Threshold). These tests are relevant to assessing applications for main town centre development and retail and leisure development larger than 2,500 sqm gross outside of town centres respectively. This is to help ensure the continuing health and viability of town centres. Local authorities can set their own proportionate floorspace threshold for the Impact Test, and the emerging Local Plan's technical evidence base Document E5 Retail and Town Centre Uses Study recommends setting this threshold at 350 sqm (gross).</p> <p>Subject to evidence the policy could also speak to how potentially harmful uses (fast food and gambling venues) will be managed and located at peripheral locations. There may also be some merit in the policy considering main town centre (defined under Class E) that generate high levels of vehicle movements – specifically gyms play spaces and nurseries for young children. These are uses, under Class E, that could legitimately be in the heart of town centres but consequently create a conflict in terms of their accessibility.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy EC15 Hertsmere's Local Town Centres and District Centres	<p>The non-strategic policy seeks to protect and enhance the vitality and viability of these key local centres by securing long-term main town centre usage. The emerging Local Plan's technical evidence base, Document E5 – Retail and Town Centre Uses Study recommends the following hierarchy -</p> <p>Local Town Centres – Darkes Lane, Potters Bar District Centres – High Street, Potters Bar; Bushy; Bushey Heath; and Radlett</p> <p>These centres are identified on the Spatial Strategy Key Diagram and will be shown on the proposals map. The policy will seek to resist the loss to non-main town centre uses at ground floor level; specifically, to uses that could harm the centres vitality and viability. The policy could form the basis of future Article 4 Direction interventions – subject to that being justified by evidence. The policy's supporting text will set out how existing local centres will continue to support existing residential and employment communities particularly where future intensification (within those areas) is appropriate and being pursued.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy EC16 Hertsmere's Local Centres, Neighbourhood Centres, Shopping Parades, Corner Shops and other Service Points	<p>This non-strategic policy speaks to the next tiers of centres which will be identified and mapped. The policy seeks to protect and enhance the convenience retail offer provided by these places to their surrounding residential and employment communities. Again, a key objective may be to ensure their integrity and resist change of use to residential and thereby prevent their fragmentation. The policy could form the basis of future Article 4 Direction interventions – subject to that being justified by evidence.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy EC17 Concentration of Harmful Uses	<p>We are proposing a non-strategic policy that seeks to manage concentrations of harmful main town centre uses, such as fast-food takeaways, vape shops and betting shops/ gambling venues.</p>	<p>This is a management policy which does not in itself lead to any development.</p>

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	<p>Proposals for such uses will be permitted within designated town centres unless they are within 800m of a secondary school.</p> <p>In determining applications, the policy will consider whether a harmful concentration of uses already exists in town centres. Suggested guidelines:</p> <ul style="list-style-type: none"> no more than 10% or two consecutive fast-food units within a centre. no more than 5% or two consecutive betting shops, pay day loan shops or amusement arcades within a centre. 	<p>There are no linking impact pathways to Habitats Sites.</p>
<p>Policy EC18 Culture, Creative Industries and the Evening Economy</p>	<p>A possible strategic policy option that, probably for Hertsmere, focuses upon cultural uses within the context of the evening economy. Our evidence is clear that strengthening the evening economy and diversifying hospitality provision will be critical to future-proofing our town centres against evolving consumer trends.</p> <p>This may provide a link to higher-order strategic policies that seek to secure Hertsmere's town centres as viable and sustainable evening economy destinations that provide a meaningful alternative to St Albans and Watford – and consequently mean that local residents and businesses don't have to travel or order-out to meet their needs (for food and drink). An alternative policy approach is to address this matter through specific settlement and place principles policies IE those for Borehamwood Town Centre.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
<p>Policy EC19 Public Houses</p>	<p>A non-strategic policy option that has been prepared and adopted by other local planning authorities elsewhere. The policy specifically seeks to protect the provision provided by public houses; in terms of use for food and drink, and as hub-uses within wider residential and employment communities. The need for a policy of this type of policy is entirely dependent upon relevant technical evidence – invariably in terms of loss of provision.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
<p>Policy EC20 Markets</p>	<p>This non-strategic policy will seek to protect and enhance markets and market spaces in the Borough. It will encourage new market spaces that complement Hertsmere's town centre network and hierarchy and contribute to the culture and vibrancy of the Borough.</p> <p>Proposals for town centre redevelopment will be expected to protect and enhance existing market spaces and consider the provision of new spaces.</p> <p>Market proposals outside of main town centres will be subject to the sequential approach to ensure it would not have a detrimental impact on existing town centres.</p> <p>Any proposal affecting an existing market will normally be expected to include re-provision, with consideration of factors including the impact on the vitality and viability of the town centre and its distinctive local character, the provision for small business, and the public realm and townscape. The policy could also speak to management measures, infrastructure and development control.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
<p>Policy EC21 Visitor Accommodation/ Hotels</p>	<p>This non-strategic policy will help ensure that any new visitor accommodation will:</p> <ul style="list-style-type: none"> be appropriately located in town centre/edge of centre or otherwise well-connected locations; be proportionate to their location in terms of size, scale and function; not result in a harmful overconcentration in an area; not result in a net loss of residential dwelling units; Comply with the relevant policies in relation to high quality design, parking standards and servicing; be sufficiently adaptable to allow for future changes in accommodation standards or changes of use; and 	<p>Although precise locations are not specified by this policy it is possible that resultant development will occur within the impact zone of a Habitats site.</p> <p>There is a therefore a potential linking impact pathway of recreational pressure to Wormley-Hoddesdonpark woods SAC which have been screened in.</p>

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	<ul style="list-style-type: none"> include ancillary public uses at ground floor level where appropriate (depending on location). <p>The policy will help ensure that any conversion of visitor accommodation into residential use will comply with the relevant policies on residential design quality, amenity space standards and affordable housing.</p>	
Policy SC11 Safeguarding and Securing Social and Community Infrastructure	<p>This strategic policy sets out the Council's approach towards working with infrastructure partners to deliver improvements and investments in social and community infrastructure.</p> <p>The policy will link to the spatial strategy, infrastructure delivery plan, settlement and place principles policies, and site allocations.</p> <p>Major developments are expected to plan positively to meet local needs for community infrastructure, and all developments should consider this matter.</p> <p>Within site allocations, the delivery of community facilities should be considered at an early stage using the masterplanning approaches set out under Policy DM3. Other development proposals should demonstrate how any need for community infrastructure generated by the development will be addressed, particularly where this need is identified in the IDP. Infrastructure may be delivered on site, or, where appropriate, a suitable financial contribution will be secured through S106 to be used to enhance existing facilities regarding need and viability</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy SC12 Delivering High Quality Social and Community Infrastructure	<p>A non-strategic policy that seeks to secure high quality and inclusive social and community infrastructure. The policy directs proposals to appropriate and sustainable locations to ensure they complement and integrate with wider communities. It also seeks to make the best use of land supply (in accordance with wider approaches), and secure provision that will be maintained and managed over its intended lifespan. The policy also addresses proposals that seek to improve existing assets.</p> <p>The policy will be broadly supportive of proposals relating to the erection of structures and symbols related to or required for religious practices, provided they do not have an unacceptable impact on amenity or any impact on highway safety.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy SC13 Delivering Sports, Recreation and Play Spaces	<p>A non-strategic policy that seeks to ensure that new development secures provision that is accessible and inclusive to all. The policy seeks to retain and enhance existing provision.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy SC14 Nurseries and Childcare Facilities	<p>This is a non-strategic policy that seeks to ensure that childcare provision, including nurseries and child minding, is made in appropriate and sustainable locations to support planned-for housing growth.</p> <p>The policy will consider proposals on the basis of their:</p> <ul style="list-style-type: none"> sustainability and accessibility by public transport, walking and cycling; impact on the road network; design considerations, such as impact on local character and amenity; and ensuring facilities are fit for purpose for all intended users and include outside space where appropriate 	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
<p>Policy SCI5 Burial Spaces</p>	<p>A non-strategic policy that sets out the Council’s approach towards burial space and how provision will be met over the plan period. The policy will set out the Council’s role in delivering provision and how proposals for new provision will be considered. Subject to the scale of need, the emerging Local Plan will consider the potential to allocate additional provision. An allocation will be identified through the Settlement and Place Chapter. This policy will set out the approach to meeting the need for burial space for different communities within Hertsmere over the plan period, based on the available evidence. The Council is currently in the process of carrying out a local assessment of burial space provision.</p> <p>A policy might include considerations such as:</p> <ul style="list-style-type: none"> adequately meeting the needs of various faith groups across the Borough; being located within reasonable proximity to the community it serves; identifying and responding to site constraints, in particular archaeology and flood risk Explore the opportunities for protecting and enhancing the openness of the Green Belt; open spaces; and biodiversity, with reference to other policies. 	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
<p>Policy GI1 Hertsmere’s Green Infrastructure</p>	<p>A strategic policy that sets out the Council’s borough-wide approach towards green and blue infrastructure. The policy will link back to the Spatial Strategy and the Settlement and Place Principles and will consider a place-based approach to GI and open space network policy. The policy seeks to secure a connected, publicly accessible network that makes an important contribution to the Borough’s local distinctiveness including its character and heritage, and towards ensuring that the Borough continues to be open and inclusive of all.</p> <p>The policy could stress that the GI network, from a landscape level down to localised elements of GI, is integral to supporting sustainable neighbourhoods and socially cohesive communities.</p> <p>The policy requires that new development proposals:</p> <ul style="list-style-type: none"> must protect and seek to enhance provision of green infrastructure across the Borough, including by improving or creating new links between its different elements must investigate and maximise opportunities to enhance existing green infrastructure and create new provision on site, with reference to the Hertfordshire Green Infrastructure Study; must conserve or improve the character, quality and condition of the prevailing landscape across Hertsmere, as evidenced in the Council’s Sensitivity and Visual Impact Assessment, and the Hertfordshire and national Landscape Character Assessments; must make suitable arrangements for the long-term management of green areas and planting, including retention of large trees should explore and where possible deliver opportunities that improve connections between the Borough’s green and open spaces; and where appropriate and necessary, proposals will be supported by a health impact assessment that considers inequalities 	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
<p>Policy GI2 Hertsmere’s Waterways and Blue Infrastructure</p>	<p>A possible strategic policy that sets out the role of and approach towards the Borough’s waterways and other blue infrastructure. The policy could require that development proposals identify and respond positively to the unique attributes of waterways, giving particular consideration to their: environmental function and ecological qualities; contribution to the Borough’s network of open spaces; recreational and</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	amenity value; and distinctive features that help to shape and reinforce the Borough's physical, cultural and historical character.	
Policy GI3 Open Space	<p>A further strategic policy that sets out the Council's/ local plan's approach to managing open space provision. This may follow the inter-connected GI/ open space "grid" or network approach set out above. This will set out a hierarchy of open space provision – how it will be managed and new provision secured. This could include designated open spaces – inclusive of strategic open space and local green space; and neighbourhood level open space.</p> <p>The policy could link to settlement and place principles and their associated site allocations – where these secure new provision. The policy will set out how growth will enhance the quality and function of the Borough's open spaces</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy GI4 Biodiversity and Access to Nature	<p>A strategic policy that sets out the Council's approach towards promoting and securing conservation, restoration and management of habitats as well as the protection of species.</p> <p>The policy will work alongside the Local Nature Recovery Strategy (LNRS) as part of a strategic approach to nature conservation and to deliver Biodiversity Net Gain within the Borough.</p> <p>The policy will continue by setting out the hierarchy of nature conservation sites across the Borough.</p> <p>The policy will set out the approach towards proposals that could have wider impacts – specifically on designated sites beyond the Borough's administrative boundary.</p> <p>The policy will also set out the approach towards BNG – the 10% increase in habitat value.</p> <p>It will state that BNG should be fully integrated into the design-led approach.</p> <p>The policy will set the requirement that proposals that are likely to impact on designated nature sites will need to submit an Ecological Assessment – the requirement may, if justified, extend to include consultation with the relevant local Biodiversity Partnership.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>The policy will require developers to undertake Ecological Appraisals for proposals likely to impact on designated nature sites.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy GI5 Urban Greening and Trees	<p>A non-strategic policy that seeks to secure a wide range of measures that can be incorporated into buildings and spaces to increase green cover in the Borough. These measures include but are not limited to: tree planting, naturalised biodiverse landscaping, green roofs and walls, hedges, climbers, plants for pollinators, de-paving, rain gardens and sustainable drainage systems using natural or semi-natural features. Urban greening can provide multifunctional benefits such as for climate change resilience, amenity including air quality, nature conservation and local character.</p> <p>The policy could seek to achieve a target for Urban Greening Factor – this would require technical evidence that demonstrates that this is necessary and that it would not adversely impact the financial viability of new development. The Plan could follow the London Plan approach – which may be defensible as the Borough is adjacent and functionally related to the Capital.</p> <p>The policy could speak directly to incorporation of measures such as green roofs and walls as part of the wider design-led approach – specifically that such measures be considered and integrated from early in the process and not be simple afterthoughts/ add-ons.</p> <p>Depending upon evidence, the policy could take a robust approach towards trees – both in their retention and incorporation into new development but also in terms of replacement. The policy could clearly set out the requirement to retain all protected and designated trees – i.e. TPOs, veteran trees and ancient woodland.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	The policy would set out the circumstances when a landscape study would be required as part of a proposal submission. This may be linked to the spatial strategy, the settlement and place principles, and the site allocations which could provide additional guidance	
Policy GI6 Food Growing and Development on Agricultural Land	A possible non-strategic policy that could relate to allotments and other initiatives, such a guerrilla gardens (IE fruit trees on public land) that contribute towards food growing. For clarity, the policy could provide a link back to the spatial strategy in respect of quality environments and climate change mitigation – the latter in respect of GI/ biodiversity but also in terms of resilience. It is suggested that there would be clear links to larger allocations. The policy would set out that development should be avoided on the best and most versatile agricultural land.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy GI7 Geodiversity	A non-strategic policy that relates to the protection and promotion of geodiversity assets (i.e. RIGS). The policy could identify the location of these sites – there could be further crossreferencing in relation to settlement and place principles and site allocations. The latter may be relevant in respect of Bowmans Cross – in terms of either its continued operation and/ or its restoration.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy SD1 Responding to the Climate Emergency	A strategic policy that sets out how the Local Plan will respond to the climate emergency The policy provides the Council with an opportunity to set out how growth across the Borough will move towards net zero as required by the Environment Act and the Council's Climate Change and Sustainability Strategy. Specific policy requirements will need to be justified in terms of their possible impact on development viability, and how it may in turn impact on delivery. The policy provides an overview of the approaches set out in detail in the non-strategic policies in the rest of the chapter towards air quality, energy infrastructure, dealing with waste and contamination, managing water and flood risk, and moving towards net zero.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy SD2 Sustainable Design and Retrofitting	A strategic policy that seeks to ensure that all development proposals reach high standards of sustainable design. Sustainable Design Statements will be required for all proposals, and for major applications these will need to address landscape design and urban greening; nature conservation; energy use and heat risk management; carbon emissions, including embodied carbon and unregulated emissions; air quality; flood risk and water management; ground conditions; waste reduction and the circular economy; and operational energy and on-site renewable generation. The policy will expect that buildings are reused first before demolition, and any proposal that includes demolition of buildings will be expected to demonstrate why retrofitting was not possible. The policy will also speak to external sustainable design standards that the Council expects development to meet. This standard is likely to either be BREEAM (Building Research Establishment Environmental Assessment Method) or LETI (Low Energy Transformation Initiative), and will be applied to all new development over 500sqm gross, as well as major residential and non-residential refurbishment of buildings.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy SD3 Managing Heat Risk	A strategic policy that seeks to minimise the adverse impacts of heat risk through the design of buildings and spaces, and through material choices and urban greening measures. The policy will require that all new development must be designed to reduce the potential for internal overheating and reliance on air conditioning systems. Major developments that incorporate public realm improvements will be required to demonstrate that they have been positively designed to create a comfortable environment. This might be through the provision of shade and other passive cooling measures, with urban greening measures being particularly encouraged, in line with other sections of the Plan.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	The policy is linked to other complementary approaches that seek to secure high quality design and gains for nature and the environment, including those on open space provision and BNG/ urban greening.	
Policy SD4 Minimising Green House Gas Emissions	<p>A strategic policy that contributes towards the move to net zero. It requires that development proposals must be designed to reduce greenhouse gas emissions in operation and minimise energy demand (annual and peak). The policy will require that proposals meet the minimum on-site reduction of carbon emissions of at least 35% beyond the baseline of Part L of the Building Regulations 2021, and calculate and minimise emissions from any part of the development that are not covered by Building Regulations (e.g. unregulated emissions).</p> <p>The policy could provide a framework for off-site contributions and payments in lieu, where proposals exceptionally fail to meet net zero requirements. These could be used to contribute towards off-site measures. This part of the policy is dependent upon technical evidence which has yet to be completed, including the whole plan viability assessment, and which will be available at the Regulation 19 stage.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy SD5 Improving Air Quality	A possible strategic policy that seeks to address air quality matters raised through place making, as part of the wider climate change agenda. Critically, the policy requires that all new development must use the design-led approach and integrate on-site measures to improve air quality and prevent or minimise the population's exposure to poor air quality, having regard to any relevant Air Quality Management Plan(s). This approach integrates with other policies to secure quality growth/ place-making.	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy SD6 Energy Infrastructure	A strategic policy that requires that development proposals be designed in response to a site-specific assessment of the most effective and efficient energy supply options. This is most likely to be relevant to the strategic urban extensions and new settlement(s).	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy SD7 Minimising and Managing Flood Risk	A strategic policy that sets out how proposals will minimise flood risk – specifically in applying the sequential test and the requirements for site-specific Flood Risk Assessment (FRA). The policy will include mapping that identifies Flood zones, including fluvial, reservoir groundwater and surface water flood risk.	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy SD8 Water Supply and Waste Water	A strategic policy that sets out how development proposals for new water supply and wastewater facilities or the expansion of existing facilities will be supported subject to meeting criteria.	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy SD9 Ground Conditions	A strategic policy for the consideration of proposals on sites that may be contaminated. This policy links in with the wider approach of optimising/ intensifying development on previously developed urban land and securing sustainable and successful place-making. The policy sets out the requirements for development proposals to demonstrate that any risks associated with land contamination, including to human health, public safety and the environment will be adequately addressed to make the development safe.	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy SD10 Reducing and Sustainably Managing Waste	A strategic policy that sets out how the Council will consider waste management within the context of a circular economy – assuming that is how the Council wishes to proceed. The policy sets out how the Council will consider proposals for waste management and transfer.	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy SD11 Securing a Circular Economy	A new strategic policy that sets out how the circular economy approach will be applied to new development across the Borough. The policy requires that major development proposals should aim to be net zero-waste. This aligns with other related policies. The policy sets out how proposals for new development will manage both the type and volume of recyclable materials and waste arising from the development during the construction and operational phases. The policy will need to be tested to ensure that its requirements do not adversely impact on development viability.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy SD13 Groundwater Source Protection Zones	This non-strategic policy will ensure that development proposals within Source Protection Zones (to be shown on the Policies Map) are assessed in relation to their impact on groundwater, in accordance with the Environment Agency guidance. An assessment of potential impacts and mitigation measures will be required with proposals for some uses that could impact on groundwater, which may include waste processing and recycling, cemeteries, foul sewage discharge, and storage of hazardous substances (e.g. petrol stations/farm waste).	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy SD14 Minerals Consultation Area	This non-strategic policy will ensure that development within the Mineral Consultation Area shown on the Policies Map will not sterilise or prevent the future extraction of the mineral resource. Where there may be a significant impact on the resource, advice will be sought from HCC as Mineral Planning Authority.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy TR1 Sustainable Transport and Movement	This will be a strategic policy that sets out the Local Plan's overarching approach towards securing transport networks that support successful and sustainable place-making. It will focus upon locating future growth within places that already have good access to travel networks; making the most efficient use of land supply at those locations. This approach is consistent and in alignment with the spatial strategy and approaches of optimising the delivery of new growth. It is also consistent with the wider strategy of minimising harmful impact to the Green Belt and securing its extent in the longer-term.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy TR2 Transport Requirements for New Developments (Healthy Streets Approach)	A new strategic policy that adopts and promotes the Healthy Streets approach for new development across the Borough. The policy aligns with wider approaches that secure successful and sustainable place-making; the design-led approach towards delivery; master planning of growth; secure high-quality development; and optimising capacity/ supply.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy TR3 Parking	A new non-strategic policy is proposed that introduces a carefully managed approach to parking, and particularly car parking. The new approach will work with other policies to support the delivery of inclusive, healthy, safe, liveable and sustainable neighbourhoods.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy TR4 Deliveries, Services and Construction	A new non-strategic policy that requires that development proposals should facilitate sustainable freight, where possible, rail, and road including for 'last-mile distribution'. The policy will require that proposals also facilitate and enable safe, clean and efficient delivery and servicing for all the development's intended occupiers and uses, including emergency services.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy TR5 Taxis and Private Hire Vehicles	A new non-strategic policy that addresses and manages development proposals for offices, ranks, and other operational space associated with taxis and private hire vehicle businesses (including minicabs). The policy will be supportive of proposals that demonstrably meet the policy's criteria. These criteria will consider the appropriateness of the proposal's location; possible issues of overcrowding of provision; impacts on wider amenity; potential impacts on walking and cycling routes/ networks; securing high-quality	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	design from the development; and ensuring that new provision is safe, welcoming and accessible during operational hours.	
Policy TR6 Digital Connectivity	The new strategic policy will require that development proposals must demonstrate how they will improve digital connectivity on sites located in areas where full-fibre broadband, or equivalent infrastructure, is not currently available or on sites that are otherwise poorly served by broadband coverage, including in designated employment areas and town centres. Development proposals for digital connectivity infrastructure and associated equipment will be supported where they demonstrably meet a series of criteria. These will include justification that the new digital infrastructure is the minimum required to meet operational requirements; opportunities to share infrastructure has been demonstrably explored; consideration of the possible impact on visual amenity; no adverse impacts on open space provision; if located on a highway or footway that residual pedestrian access be provided; and the infrastructure is sensitively located and appropriately designed, and does not detract from local area character. The policy will also require that infrastructure and equipment should be removed as soon as reasonably practicable once it is not required for use, and older equipment should be upgraded wherever feasible.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy TR7 Elstree Aerodrome	A new strategic policy will support the continued operation of the aerodrome and its role as a specialist aviation and business hub within the borough. Proposals that support the continued use and operational efficiency of the aerodrome, including aviation-related maintenance, training and associated facilities, will be supported where they remain compatible with surrounding land uses and do not give rise to unacceptable impacts on residential amenity, transport networks or the surrounding environment	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy TR8 Heathrow Airport Safeguarding Zone	This non-strategic policy will ensure that the Council will consult the Heathrow Airport Operator for any wind turbine proposals within the safeguarding zone shown on the Policies Map.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy HBA1 Borehamwood Principal Location for Growth	A new strategic policy is proposed to confirm Borehamwood as the principal focus for accommodating growth within Hertsmere over the Plan period. The policy will support the delivery of new homes through redevelopment of previously developed land, regeneration opportunities within the town centre and appropriate intensification within the existing urban area. Where necessary to support the Borough's housing needs, carefully planned development on land at the edge of the settlement may also be considered where this represents a sustainable location and can be delivered alongside supporting infrastructure.	This policy includes proposed site allocations including location and quantum of development. The assessment of these allocations in Table 3 shows that there are no linking impact pathways to Habitats Sites as the growth location is outside all the zones of impact of the relevant Habitats Sites.
Policy HBA2 Borehamwood Town Centre Regeneration	A new strategic policy is proposed to support the regeneration and renewal of Borehamwood Town Centre as a vibrant mixed-use destination serving residents, workers and visitors. The policy will support redevelopment and intensification of key sites, including opportunities for mixed-use development combining residential, retail, leisure, workspace and community uses. Improvements to public realm and streets, particularly around Shenley Road and the railway station, will also be supported to enhance accessibility and the overall quality of the town centre environment.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy HBA3 Elstree Way Employment Corridor	The Elstree Way Corridor is a key regeneration area within Borehamwood, located between the town centre and the Elstree Way Employment Area. The corridor contains a number of sites capable of supporting new homes, employment activity and public realm improvements.	This is a management policy which does not in itself lead to any development.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	The Local Plan may introduce a strategic policy for the Elstree Way Corridor to ensure that future development is delivered in a coordinated way, strengthens connections with the town centre and employment areas, and contributes to the regeneration of Borehamwood.	There are no linking impact pathways to Habitats Sites as Borehamwood is outside of all of the zones of impacts of the relevant Habitats Sites.
Policy HBA4 Sustainable Movement and Connectivity in Borehamwood	A non-strategic policy is proposed to improve sustainable movement across Borehamwood. The policy will support proposals that enhance walking and cycling routes, improve access to public transport and strengthen connections between residential neighbourhoods, employment areas and the town centre. Development proposals will be expected to contribute towards infrastructure improvements where necessary to mitigate impacts and support sustainable travel.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy HBA5 Green Infrastructure and Landscape Setting	A non-strategic policy is proposed to protect and enhance Borehamwood's green infrastructure network. The policy will support proposals that improve the quality, connectivity and accessibility of parks, open spaces and green corridors. Development proposals will also be expected to respect the landscape setting of the town and contribute to green infrastructure where appropriate	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy HPBA1 Potters Bar Town Centres	A Strategic policy will support the continued vitality and viability of Potters Bar's town centres through the redevelopment and regeneration of suitable sites, improvements to public realm and the delivery of mixed-use development that strengthens the role of the centres as places for shopping, leisure, employment and community activity. Future development will seek to enhance the quality of the built environment, improve the appearance and function of shopfronts and public spaces, and strengthen connections between the High Street, Darkes Lane and Potters Bar railway station.	This policy includes proposed site allocations including location and quantum of development, The assessment of these allocations in Table 3 shows that there is a linking impact pathway of recreational pressure to Wormley-Hoddesdonpark woods SAC.
Policy HPBA2 Potters Bar Sustainable Growth	A strategic policy will direct new development primarily towards previously developed land, regeneration sites and appropriate opportunities for infill and intensification within the existing urban area. Development proposals will be expected to make efficient use of land while respecting the character of the town and the quality of surrounding residential neighbourhoods. Future development will also be expected to provide an appropriate mix of homes, including housing that meets the needs of a range of households.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy HPBA3 Movement and Connectivity in Potters Bar	A non-strategic policy will support improvements to walking, cycling and public transport connections between residential neighbourhoods, Potters Bar railway station, the High Street and Darkes Lane town centres, and nearby green spaces. Development proposals will be expected to contribute towards improvements to movement and accessibility where appropriate. Enhancing connections across the town will help improve accessibility to services and support more sustainable patterns of travel.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.
Policy HPBA4 Character, green Infrastructure and Setting	The Local Plan will seek to ensure that new development respects the town's character and contributes positively to the quality of the built and natural environment. Development proposals should support the protection and enhancement of green infrastructure, improve access to open spaces and strengthen connections between the town and the surrounding countryside. This approach will help maintain the distinctive character of Potters Bar while supporting sustainable development.	This is a management policy which does not in itself lead to any development. There are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy HBUSA1 Bushey Local Centres	<p>A new strategic policy will support the continued vitality and viability of these centres through the sensitive redevelopment of suitable sites, improvements to public realm and the delivery of mixed-use development that supports local businesses, services and community activity.</p> <p>Future development will seek to enhance the quality and character of Bushey's centres, improving public spaces, shopfronts and pedestrian connections while maintaining the distinctive character and heritage of each centre.</p>	<p>This policy includes proposed site allocations including location and quantum of development,</p> <p>The assessment of these allocations in Table 3 shows that there are no linking impact pathways to Habitats Sites as Bushey is outside of all of the zones of impacts of the relevant Habitats Sites.</p>
Policy HBUSA2 Sustainable Growth in Bushey	<p>A new strategic policy will guide new development towards previously developed land, regeneration sites and appropriate opportunities for infill and intensification within the existing urban area. Development proposals will be expected to make efficient use of land while respecting the town's character, heritage assets and surrounding landscape setting.</p> <p>Future development will also be expected to deliver a range of homes that respond to local needs and support balanced and inclusive communities.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy HBUSA3 Movement and Connectivity in Bushey	<p>A new non-strategic policy will support improvements to walking, cycling and public transport connections between residential neighbourhoods, Bushey Village, Bushey Heath, Bushey railway station and surrounding open spaces. Development proposals will be expected to contribute towards improvements to movement and accessibility where appropriate.</p> <p>Enhancing connectivity will help improve access to services and public transport while supporting more sustainable patterns of travel.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy HBUSA4 Character, Heritage and Environmental Setting	<p>A non-strategic policy will seek to ensure that new development respects and enhances the character of the town, including its historic environment, conservation areas and valued green spaces. Development proposals should contribute positively to the quality of the built and natural environment while protecting the distinctive character and landscape setting of Bushey.</p> <p>This approach will help ensure that the town continues to evolve in a way that supports sustainable growth while maintaining the qualities that make Bushey a distinctive place.</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>
Policy HRA1 Radlett Village Centre	<p>A non-strategic policy will support the sensitive redevelopment and enhancement of sites within the village centre to strengthen its vitality and viability. Development proposals will be expected to support a diverse mix of uses, including retail, cafés, restaurants, community facilities and other town centre uses that contribute to the role of the High Street as a focal point for village life.</p> <p>Opportunities will also be supported to improve the quality of public realm, shopfronts and pedestrian environments, helping to reinforce Radlett's distinctive village character and support local businesses.</p>	<p>This policy includes proposed site allocations including location and quantum of development,</p> <p>The assessment of these allocations in Table 3 shows that there are no linking impact pathways to Habitats Sites as Radlett is outside of all of the zones of impacts of the relevant Habitats Sites.</p>
Policy HRA2 Movement and Connectivity in Radlett	<p>A non-strategic policy will be drafted to require development proposals to contribute towards improving connections between residential neighbourhoods, Radlett Village Centre and Radlett railway station. Opportunities will also be supported to improve pedestrian and cycling routes, strengthen east-west connections across the railway and improve the safety and accessibility of key routes.</p> <p>These measures will help encourage more sustainable patterns of travel and reduce reliance on private car journeys within the village</p>	<p>This is a management policy which does not in itself lead to any development.</p> <p>There are no linking impact pathways to Habitats Sites.</p>

