



PLANNING FOR GROWTH



ISSUES AND OPTIONS Public Consultation Report



October 2018

Hertsmere Local Plan – Planning for Growth, Issues and Options

Public Consultation Report

Consultation Statement

1. Introduction

- 1.1 The Local Plan is used to guide decisions on matters ranging from the location of housing, schools, parks and open spaces to the design requirements of new buildings. Policies in the Local Plan are used when decisions on planning applications are made.
- 1.2 The housing requirements in the current Hertsmere Local Plan are based on Strategic Housing Market Assessment (SHMA) work carried out in 2010, which was informed by the urban capacity-based figures in the Regional Spatial Strategy for the area which has since been revoked. They are based on the period 2012-2027. As our recent study¹ has shown, there is a much greater need for housing in the area, and so we need to plan for this through a new Local Plan. The SW Herts SHMA identifies a level of need over 15 years of 9,000 homes, and the SW Herts Economic Study² finds that 9,000 jobs will be needed in Hertsmere over the plan period, so we would not be able to accommodate this level of growth within existing urban areas without a dramatic change to the density of housing. For the first time in many years, we have to consider allocating some land within the Green Belt for new homes, jobs and supporting infrastructure.
- 1.3 The timetable below shows the stages that are involved in the preparation of a new Local Plan. Stage 1, informal consultation, and Stage 2, Issues and Options Consultation, have been completed, and we are now working towards further engagement on a potential housing and employment sites
- 1.4 Throughout phases 1 to 3 in the table below we will also be working on preparing the evidence base which will inform the final Local Plan.

¹ <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/SW-Herts-SHMA-Final-Report-Jan16.pdf>

² <https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Local-Plan/SW-Herts-Economy-Study-Feb16.pdf>

Stage	Dates	Status
1 – Informal consultation: Planning for Growth (Regulation 18)	December 2016 – January 2017	Complete
2 – Issues and Options consultation (Regulation 18)	September – November 2017	Complete
3 – Potential housing and employment sites (Regulation 18)	October – December 2018	Technical studies being undertaken.
4 – Publication Draft Local Plan (Regulations 19/20)	Autumn 2019	Not started
5 – Submission to Secretary of State (Regulation 22)	Winter 2019/20	Not started
6 – Examination Period (Regulation 24)	Tbc	Not started
7 – Adoption of Local Plan (Regulation 26)	Tbc	Not started

2. Informal consultation: Planning for Growth

- 2.1 As part of our early work on a new local plan for Hertsmere, the Council has carried out an informal consultation exercise to highlight that there is an objectively assessed need for a larger number of homes than is currently planned for through the Hertsmere Local Plan 2012-2027 – as evidenced by the South West Hertfordshire Strategic Housing Market Assessment 2016 (SHMA 2016) – and to help us to gauge the views of residents and businesses around the borough about how this projected growth should best be accommodated.
- 2.2 This does not form part of the later statutory representations process on the production of a local plan, and has been carried out at an early stage– under Regulation 18 - in order to introduce the main issues to be addressed through a new local plan, in particular an increase in housing and jobs growth.
- 2.3 There are various options available for addressing how to accommodate growth, including increasing densities within existing urban areas, extending towns and villages into the surrounding Green Belt, and planning for a new settlement somewhere in the borough. We felt it important at this early stage in the process to try to find out what local people think are the main positives and negatives about the borough at the moment, and what they think are the best solutions for accommodating housing and economic growth in the future.
- 2.4 We launched the initial round of public consultation on the New Local Plan in November 2016 with a business engagement event organised together with WENTA which supports small businesses and start-ups across the county.

Since then we have sent out a newsletter to all households in the borough, promoted our online questionnaire through the local press and held a forum for agents and developers.

- 2.5 Responses were received from around 300 individuals and organisations, with the majority of people completing the online survey or returning the survey by email. A [detailed summary of this consultation](#) was published alongside the Issues and options consultation material.

3. Issues and Options Consultation

- 3.1 This report sets out the consultation arrangements proposed by the Council in the development of the Hertsmere Local Plan Issues and Options Report. The Council recognise the importance of engaging the community from the outset of the Local Plan review process, and have carried out two rounds of public consultation at a very early stage in the plan-making process, to gauge opinions before any proposals are drawn up. To this end, in July 2017, the Council agreed a [Statement of Community Involvement](#) (www.hertsmere.gov.uk/sci) which sets out the ways in which we will engage with the community on local plans as well as planning applications.
- 3.2 As with the earlier round of consultation, the purpose of this early stage of consultation was to invite comments from interested parties on all relevant topics to help identify the issues that the Council should address in the new Plan. Receiving comments at this stage helps to ensure that the Plan sets off in the right direction and covers the things it needs to cover. It also helps to inform what further evidence may be necessary beyond that we have already collected or plan to collect. It was made very clear in the consultation material that the Council was not, at this stage, proposing any policies or stating which sites should be allocated for development in the new Plan.
- 3.3 Respondents were asked to comment on a draft Vision and set of Priorities. The consultation document then identified the key challenges that will be faced over the Plan period. Whilst comments were invited on all aspects of the new Plan, the draft document helped to steer the debate by setting out some key questions as to how these challenges may be best addressed.
- 3.4 The document set the context by explaining the very high levels of development need in the Borough and the reasons why all possible opportunities to deliver this need will need to be considered as the new Local Plan is progressed. The development approaches part of the document was split into five sections: redevelopment of urban brownfield sites; growth through new garden suburbs; growth of key villages; growth of smaller villages; and creation of a stand-alone garden village.

Consultation Process

- 3.5 The consultation period ran for nine weeks from 27 September 2017 until 30 November 2017 and in line with the Council's Statement of Community Involvement (SCI), a wide variety of methods were used to engage with interested parties. All consultation documents were made available to view on the Council's website and hard copies were distributed to all libraries in and around Hertsmere.
- 3.6 During the consultation period the Council's Communications Team assisted with the consultation and, in particular, they ran a campaign using social media. A detailed Communications Strategy was prepared and a variety of media outputs were used to engage with interested parties including: a promotional video featuring interviews with members of the public; a series of 'did you know...' infographics release at intervals on social media; press releases were put out in order to encourage local press outlets to give the consultation coverage, and coverage in all local newspapers.
- 3.7 In addition to the above:
- The second Local Plan newsletter was circulated to all households in the borough, following a launch newsletter in late 2016;
 - Separate briefing sessions / presentations were held for all Members;
 - Statutory consultees and all interested parties on the Council's database were informed of the consultation and invited to comment;
 - The main consultation document was supported by a set of FAQs and a bespoke response form was prepared (print version / hard copy);
 - The consultation document was placed on the council's new planning consultation system 'Keystone' which enables people to view the document online and respond directly to each section after logging in;
 - Officers and Members attended five evening exhibitions around the borough, where we put up display boards and were available to answer questions;
 - Tear-off response forms were prepared to accompany each issue within the document. These were made available at the exhibitions to enable people to comment on just the issues that mattered most to them; and
 - 'In Conversation' workshops were held at three locations around the borough which local groups and individual residents could register to attend. A facilitator was brought in to help lead round-table discussion about the issues. These events were attended by Members and officers.

Level of response

- 3.8 We received responses from around 350 separate individuals and organisations including local residents, local groups and organisations, statutory bodies, developers, and landowners. Approximately 500 individuals

attended drop-in sessions across the borough, and another 180 people came along to our workshops.

Overview of consultation process

- 3.9 Overall, the consultation was fairly well received and many of those involved (particularly those who attended briefing sessions and meetings) were grateful for the opportunity to help steer the direction of the Plan. However, there was some criticism in that some respondents thought that there should have been greater awareness of the consultation with residents in London Colney, in particular, highlighting that they had not been notified of the Issues and Options. In addition, some respondents thought the consultation document was too long whilst (to counter these) others thought that more detail should have been provided.
- 3.10 In local plan-making, councils are sometimes told they have consulted people too late in the process, after they have already produced a detailed plan containing specific options for housing, jobs, infrastructure etc. which appear to be 'set in stone'. We decided to do the opposite of this by consulting people before doing any detailed work. However we have still faced some criticism from a number of respondents who told us they could not comment meaningfully until there were some specific options on the table. As the work on the local plan progresses, the detail that is available will increase.
- 3.11 The new online consultation portal was used by 140 respondents. The submission of comments using this method represents a positive step forward as their entry straight into the database helped to ensure that comments could be managed in an efficient and timely manner. Evidence from other boroughs shows that it normally takes around 4 consultation events for the level of online responses through the portal to form the majority of responses, as it takes a while for residents to get used to the system, the database will become more up to date with time, and individuals are more likely to already have an account set up so won't have to set this up before they can submit comments next time around. Other comments received have subsequently been published on the portal.
- 3.12 The campaign co-ordinated by the Council's Communications Team was particularly effective. As an example, during the consultation period the following social media platforms encouraged public engagement as follows:

Facebook posts

- 3.13 26 Facebook posts were placed that received around 27,930 total impressions. These impressions received a 3 per cent engagement rate on average, which

	Hertsmere BC @HertsmereBC · 22h What's important to you about where you live? Housing? Jobs? Transport? Book a place at our In Conversation events to tell us what you think pic.twitter.com/fMh3KJ5UAe View Tweet activity	629	11	1.7%	Promote
	Hertsmere BC @HertsmereBC · Nov 1 Live in Potters Bar, Shenley or South Mimms? Want to help shape where you live? Come along to our In Conversation event on 15 Nov at 6.30pm. pic.twitter.com/hl2YT1dJqp View Tweet activity	615	13	2.1%	Promote
	Hertsmere BC @HertsmereBC · Nov 3 Book your place at one of these In Conversation events and help shape the future of the borough #hertsmereNext15 pic.twitter.com/4TW9GssXQB View Tweet activity	992	14	1.4%	Promote
	Hertsmere BC @HertsmereBC · Nov 3 Come to our drop-in sessions in Radlett & Bushey next week to find out more the different ways Hertsmere could grow #HertsmereNext15 pic.twitter.com/anuaZhvxZ8 View Tweet activity	869	6	0.7%	Promote
	Hertsmere BC @HertsmereBC · Nov 6 If you live/work in Bushey & want to have your say on future of the town & area, come to tomorrow's drop-in session 6.30-9pm Bushey Centre pic.twitter.com/8QaU3eq33O View Tweet activity	867	10	1.2%	Promote
	Hertsmere BC @HertsmereBC · Nov 28 Three days left to give your views and comments in our consultation and help shape the future of Hertsmere #hertsmereNext15 pic.twitter.com/R3szZE2bA9 View Tweet activity	628	5	0.8%	Promote

3.17 In addition to the data set out above, this information is useful as it provides an analysis as to what tools generated the most engagement. The findings of the report will help to guide the engagement strategy for future consultation stages.

3.18 Overall, whilst lessons can always be learned for future work of a similar nature, it is considered that the overall consultation was a positive undertaking. The use of the online portal worked reasonably well for a first-time use, and the Council successfully used a variety of methods to engage with a high number of groups / individuals. Whilst this engagement would have helped to generate the relatively high level of response it should also be acknowledged that the content of the consultation (particularly the notion that Green Belt land is likely to need to be built on) is likely to have driven a higher level of interest than would otherwise have been the case.

3.19 There are lessons to be learned from this consultation process, and we have received some comments and criticisms from the public about the process. These include:

Comment: The newsletter was not delivered to all households.

Response/learning: We used the services of an external distribution company to deliver the leaflets, and their records showed that some addresses in the South Mimms area were missed. This was rectified at no extra cost. A number of people in other areas told us they had not received a leaflet; however the GPS tracking used by the delivery company showed that the delivery people had visited the affected streets and in some cases it was possible to see they had gone into each property. It is unknown whether the leaflets were delivered along with unsolicited mail (e.g. pizza menus) and so were inadvertently thrown away; whether people did not properly read the leaflet and threw it away without realising; or whether the leaflets were not delivered to begin with. For future consultations we will consider whether any alternative delivery methods can be used and continue to monitor the results.

It was suggested by several people that officers should hand-deliver the leaflets. This is not a feasible solution given the costs of staff time compared with the costs of employing an external delivery company.

Some people suggested that an 'official-looking' letter from the council may have more impact than a colourful leaflet. Given past experience of delivering this type of letter to inform people about public consultation on local plan documents, we have found that it often gets ignored or thrown away, and we get a lot of worried phone calls from (mostly elderly) people who see an official letter and think they have done something wrong or need to take some urgent action. Therefore we plan to retain the newsletter format for the next round of Regulation 18 consultation. We will also distribute the next newsletter to residents in London Colney following the concerns expressed by some residents living there who weren't notified about the Issues and Options report.

Comment: The Issues and Options document was criticised for lacking in detail about the locations of sites.

Response/learning: The reasons for this have been addressed above, but some people seemed to think that the council had already made all of its decisions about future growth and was just holding it back from the public as some kind of conspiracy. There is no way to avoid this, as mentioned above, consulting too late and once decisions have been made provokes frustration as does consulting early while there is a genuine opportunity for people to have a say in the plan but where there are no specific proposals to be considered.

Comment: A number of people said that they found the consultation portal difficult to use/not user-friendly or simply did not work.

Response/learning: This may be because it is the first time we have used it in Hertsmere, or that they were not used to using this type of system. A factor in this may be the way that we had chosen to structure our document and the layout of the questions we had chosen to ask. This is something that we will look into for the next round of consultation in order to both make the experience better for consultees, and to improve the way we are able to use the system to extract data about the consultation, which largely depends on the way the document is set up from the beginning. Officers checked the portal every day to ensure that it was functioning correctly (which it was) and although some residents outside of the borough have stated that they could not get the portal to work, this may be down to the browser being used or network connection/speed.

Comment: Issues with initial facilitated workshops held in November 2017.

Response/learning: The first workshop received an angry reaction from a few attendees who wanted the chance to ask questions and share their views rather than take part in any group exercises or give their views. Some attendees (at both this and the other two workshops) felt that the way in which events were, in their view, taken over by a small number of vocal people, made it difficult for them to comfortably express their own views

Following this, we reviewed the format and content of the workshop alongside the Communications Team and the brief for the external facilitator who had run the workshop on our behalf.

The format was amended to allow a question and answer session with Members and senior officers at the beginning, a reduced round table discussion and a further question and answer session at the end.

Following the changes, the second and third events ran much more smoothly although there were of course strong feelings being expressed.

A number of people commented that they felt the second and third events were well-organised and that they were made to feel welcome.

There were a number of younger people at these events but a majority of those attending would have been in the over 50s age group. It is important that we hear from all age groups, including those who are currently able to access the housing market in the borough, and we will review how best we can reach out to all local demographics.

We would consider holding similar workshops again, however we would not underestimate the strength of feeling about the proposals, and expect people to

sit down straight away and work on a set of questions we had prepared; we would take into account everything we have learned from this experience.

- 3.20 We received positive feedback on the public drop-in exhibitions that were held around the borough. People generally felt that these were well-organised, officers were knowledgeable and friendly, and the exhibition display material was informative and well-presented.

4 Summary of comments

- 4.1 The high level summary below provides an overview of the main comments received during the consultation. A more detailed summary of the responses received to all questions from organisations and the development industry, is attached as an appendix to this report.

Q1 Vision: Do you agree with the proposed Local Plan Vision?

- 4.2 Those who supported the Vision and those who did not were broadly split in two. The majority of developers, land owners and consultation bodies and some residents and local groups lent their general support to the acknowledgement of the need for higher levels of housing and jobs growth, and its acceptance of the very likely scenario that some Green Belt release will be required alongside the development of brownfield land and provides a clear direction for the New Local Plan.
- 4.3 The majority of residents and residents' groups who responded did not support the Vision, in particular the aim to meet housing need in full, primarily due to concerns over infrastructure. To address these concerns suggestions were made in regards to sustainability, housing for older people, transport, jobs etc.
- 4.4 Points have also been raised about the Vision seeking to improve, rather than maintain, the natural and historic environment, and that it is not specific enough to Hertsmere or too good to be true.

Q2 Priorities: Do you agree with our proposed priorities for the Local Plan?

- 4.5 The majority of respondents supported the Priorities in general, and a number of specific points were raised, such as the need to provide new homes in sustainable locations, and a flexible spatial strategy to maximise the delivery of sustainable housing.
- 4.6 It was noted that some terminology used in this section was not as clear as it could be, and that the Priorities are contradictory, in particular the idea that building more homes will not improve, but instead worsen, the natural environment and traffic issues.

Part 2: About your borough and the planning issues it faces

Q3 Housing Need: Do you agree that the Council should aim to meet the actual level of housing need (600 homes per year) we have identified above?

- 4.7 The aim to meet OAN is generally supported by the development industry. A number of land promoters commented that the council should commit to meeting its full OAN, rather than 'aim' to meet this, and that OAN should be regarded as a minimum number rather than a target. Some respondents mentioned that the council should seek to meet unmet need arising from other parts of the SW Herts HMA and Greater London.
- 4.8 A number of representations question whether the figure is robust and what are the implications of the proposed Government standardised formula for establishing OAN. The Government methodology has been used to query the housing figure both from the perspective of local bodies seeking for a lower figure, and the development industry seeking to increase the number, as the output of the methodology varies depending on whether it is taken before or after January 2018 when the Core Strategy is 5 years old.

Q4 Affordable Homes: Do you agree that we should continue with our requirement for 35-40 per cent of new homes to be provided as affordable housing?

- 4.9 The majority of respondents to this question supported retaining this percentage subject to viability testing and robust evidence being available to support this. Some questioned whether this housing would be genuinely 'affordable' to local people (a comment made by many people at the public exhibitions and workshops), as well as meeting local needs in terms of size.
- 4.10 A small number of respondents from the development sector said that the Local Plan should not set a percentage for affordable housing, but should instead rely on viability testing on a site-by-site basis to secure the maximum number of affordable homes on each site.

Q5 Self-build homes: Do you agree that land within larger developments should be available for up to 10 per cent of homes to be self-build properties?

- 4.11 Most respondents agreed with this approach, however some made comments about how this would interact with the affordable housing requirement. Suggestions included rolling the self-build percentage in with any affordable housing requirement; excluding the number of self-build homes on a site from the number of homes used to calculate affordable housing; exempting schemes which provide a lot of affordable housing from having to provide self-build plots; and that self-build should be subject to viability testing.

- 4.12 The impact of self-build housing on the construction of larger developments was mentioned by a number of respondents, for example health and safety on a large site, and the need for design codes to ensure a harmonious development.

Q6 How should we meet the accommodation needs of Gypsies, Travellers Travelling Showpeople: Gypsies, Travellers and Travelling Showpeople

- 4.13 Of those who answered this question, the majority of responses from individuals, groups, organisations and developers indicated the council should plan for the needs of these groups alongside general housing need, and that sites should be found which are close to amenities. However, a limited number of responses from local people indicated an intolerance of the needs of this community, or considered that accommodation for these communities should be located as far from the settled community as possible.

Q7 Other housing need: How should we meet other types of needs, including housing for the elderly?

- 4.14 Accessible and adaptable homes were seen as important to meet the needs of an ageing population. There was a general view that housing for older people is best placed within or close to existing settlements with good access to facilities and public transport, or within new mixed communities with their own shops and services; a range of types of accommodation should be provided to meet different needs (e.g. bungalows, extra care flats, retirement communities); and affordable specialist housing should be incorporated.
- 4.15 Several local groups mentioned a need for smaller homes to meet the needs of older people downsizing as well as first-time buyers.

Q8 Jobs: Do you agree that we should plan for this level of new jobs (9,000 new jobs over 15 years) to support business creation and meet the employment needs of an increasing population?

- 4.16 The majority of respondents agreed with this. Some respondents indicated the felt that employment uses should be retained on the edges of existing settlements in order to retain vitality and proximity to sustainable transport links and other services, while others thought these types of employment areas should be used for housing and employment should be pushed out into the Green Belt. The local evidence of need should be robust, and employment development should be provided in accessible locations, and not used as a way to justify building homes in the Green Belt.

Q9 Retail and Shopping: Do you agree that we should maintain a high level of retail and services within the borough's shopping centres and local parades? What other uses may be considered appropriate in these areas?

- 4.17 Most agreed with this approach as it would help maintain vitality and viability of existing shopping areas. Some questioned whether there is currently a 'high level' of retail provision within centres.

Q10 Community facilities: What community facilities or local infrastructure improvements do you think should be given priority?

- 4.18 Health facilities, education (schools and nurseries), premises for faith groups, station car park improvements and highway improvements were most mentioned by individuals and local organisations. Consultation bodies indicated that specific sites need to be set out for education, and that provision for green infrastructure, young people, public open space and sport need to be made. A number of the representations indicate that any new facilities should benefit existing communities as well as new development, and some mentioned that the provision mechanism (whether CIL or Section 106) should be set out so viability impacts are known at an early stage.

Q11 Sustainable Travel: What types of sustainable transport improvements would you like to see prioritised locally as part of the future planning of our borough?

- 4.19 Responses to this question include that bus services, cycle and pedestrian routes into existing centres within the borough need to be improved; better bus links are needed between the main towns to connect with stations; and an integrated bus network (single ticketing) would improve the system. New development sites should prioritise cyclists and pedestrians, and should be well-connected without the need to use a private car. Facilities at existing stations could be improved (e.g. car parking and lifts).

Part 3 Where should new development be built?

Q12 Brownfield Sites: Which areas do you think are best placed to accommodate this type of growth and why?

- 4.20 Building on brownfield sites was supported by a majority of respondents as being the first option for development. There was recognition from many that land in urban areas needs to be used more efficiently, and that, even with higher density development such sites are in finite supply and will not be able to accommodate all of the needed growth. Reallocating edge-of-centre employment uses could free up brownfield land for housing. Higher density housing should be considered for the four main settlements, and appropriate densities and building heights should be indicated to provide the amount of development and to help identify impacts on the character of the surrounding area.

Q13 New garden/suburbs: Where do you think would be the most sustainable locations for garden suburbs?

- 4.21 There was general support for sustainably-located garden suburbs, providing they are able to deliver an appropriate level of infrastructure to meet their needs and those of the existing population without impacting negatively on existing infrastructure. Sites should be accessible and well-designed and incorporate community and commercial uses as well as housing. The relatively long lead-in times for large sites were mentioned, and the need for further evidence before any sites are selected. The need to review other options for growth (i.e. brownfield sites, urban densification) before considering releasing Green Belt sites was also raised.

Q14 Growth of key villages: Do you agree with this approach? Where do you think this development should take place?

- 4.22 This approach to growth was supported by around half of respondents to this question. This was in part because some representatives understood the options as being exclusive of each other or that there was to be a 'principal' option taken forward which would meet the majority of housing need on its own. The council has tried to be clear that a combination of approaches is likely to be needed, however perhaps the Issues and Options Document was not sufficiently clear on this point. Views on which of the key villages would be most suitable to accommodate this form of growth were mixed, with most residents living in either of the villages saying their particular village was not suitable, and developers and planning consultants making a case for the suitability of whichever village their site is located within/adjacent to. Arguments have been made that both of the key villages, Elstree and Shenley, lack sufficient facilities and sustainable transport links, however converse arguments have also been made.

Q15 Other villages: Which villages do you think would be most suited to this form of growth?

- 4.23 Many respondents felt that the smaller villages in Hertsmere are unsustainable locations for growth, as they have few local services and facilities, and public transport links are poor. Others felt that some limited growth within or adjoining smaller villages could help to revitalise the village as well as supporting services in nearby villages, such as pubs, which suffer due to low population levels. There was a general consensus that the smaller villages are suitable locations for proportionate, small-scale growth (for example infill development on a very small scale), rather than large-scale growth.

Q16 Garden village: Do you support the idea of a new garden village as a long-term growth option for Hertsmere?

4.24 The consultation responses show general support for the concept of a garden village or new settlement. However, the possible location within the indicated area of search was not supported as widely. Many respondents (irrespective of their place of residence) thought that any new settlement should be located on a railway line, and that the area of search could only be reached easily by car, connecting directly into the motorway network and encouraging longer-distance commuting. Among residents living close to the area of search concerns were raised about traffic generation and impacts on house prices, as well as concerns amongst out of borough residents that they had not been consulted, and that the adjoining council (St Albans) had not been properly engaged in the process. There have also been reservations raised about this being the main approach to delivering new development in Hertsmere, because it will take a long time to get started on the ground (around 10-20 years), and that the 4,000 homes are unlikely to be delivered within the plan period. Some also indicated that the size of the proposed settlement would be too small to achieve the 'critical mass' needed to deliver the infrastructure requirements (needing 5,000-10,000 homes).

5 Next steps

- 5.1 To sit alongside this summary report, a more detailed schedule of comments made by organisations, developers and residents is appended to this document. Full versions of the representations are available to view as a hard copy at the Civic Offices in Borehamwood. Representations are also available to view on the council's [Consultation Portal](#),
- 5.2 Alongside the Council's existing evidence, the comments received through this consultation will help to steer the drafting of the new Plan and, where appropriate, the commissioning or preparation of new evidence. A revised Local Development Scheme is being prepared for submission to the Executive in January 2019. This will set out up-to-date timescales for the local plan work.

Appendix A

Issues and Options consultation (Reg 18, September-November 2017)

Developer, landowner and planning consultant representations with HBC responses

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
Part 1				
General comment				
	Planning Potential for Inland Homes Ltd	Land north of Barnet Lane	Land north of Barnet Lane is on the edge of Borehamwood and Inland Homes, who have an option agreement, intend residential development of up to 50 homes on the 1.66ha site.	The comments are noted. We have considered all sites put forward through the call for sites and Issues and Options consultation process, and assessed them against our published HELAA methodology in order to judge their suitability for housing or economic development. The findings are published in our HELAA.
	Matt Hill – Maddox Planning Consultants for Northern Trust		Support the overall strategy of the Plan and support the Council's efforts being undertaken to ensure an up-to-date local plan is in place.	The support is welcomed.
	Tarmac Trading Limited		Fully supportive of option to deliver homes through sustainable garden village. Owns 36 acres of land within area of search for a garden village. Suggest area of search should not be limited to land north of the M25 and highlight strong existing highway links to area of land set out in the representation. Given existing sporting and heritage visitor attractions in the area it may be a good location for additional similar facilities linked to a new garden village. TTL also owns and operates land within Tyttenhanger Quarry within the area of search.	The support is welcomed and comments noted. The land ownership details have been fed into the council's HELAA.
	Rapleys for AEW Europe	The Point, Borehamwood	The representation promotes a site known as The Point in Borehamwood town centre, currently occupied by an entertainment complex and a multi-storey car park. The freehold is owned by the council. The site is promoted for residential use due to: • The current buildings are tired and not up to modern standards; • Set back from Shenley Road so redevelopment for other town centre uses would be difficult; • Improvement to visual amenity; • Housing would soften the interface between the town centre and the neighbouring residential area; • Highly accessible/sustainable location; • Helping to meet housing need; • No loss of identified shopping frontages.	We have assessed all sites promoted against our published HELAA methodology in order to judge their potential suitability for housing or economic development and the findings are set out in the HELAA. The site is currently within the town centre boundary, although not designated as primary or secondary shopping frontage, so may be suitable for a range of town centre uses.
	Pegasus Group for Taylor Wimpey	Land south of Watford Road, Elstree	The site to the South of Watford Road, Elstree, is deliverable (suitable, available and viable) in the short-term and offers the opportunity to accommodate a high quality development of approximately 150 new homes. These Representations demonstrate that the promotion of the site is not exclusive to any one particular 'approach' as set out in the draft Local Plan, and instead highlights the site's suitability to contribute towards HBC's housing needs in all circumstances (in line with the sustainable development principles of the NPPF), and accordingly sets out the 'Exceptional Circumstances' necessary to justify a revision to the Green Belt boundary The Local Plan should identify (allocate) a supply of specific developable sites to meet HBC's objectively assessed housing needs in full (minimum of 9,000 net additional homes between 2019-2034) as far as is consistent with the policies of the NPPF; and In preparing the new Local Plan, HBC should consider revising Green Belt boundaries consistent with the policies of the NPPF in the context of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the exceptional circumstances test.	The comments are noted. We have considered all sites put forward through the call for sites and Issues and Options consultation process, and assessed them against our published HELAA methodology in order to judge their suitability for housing or economic development. The findings are published in our HELAA. A Stage 2 Green Belt review has been produced which considers Hertsmere's Green Belt in more detail against the purposes set out in the NPPF.

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			Guidance at all levels is clear that it is up to Local Authorities to determine where development should and shouldn't go; • The preparation of a new Local Plan provides the appropriate mechanism to review the Green Belt boundary and release sites for development where this promotes sustainable patterns of development and exceptional circumstances apply; and • The new Local Plan should plan positively and support the release of the site from the Green Belt and replace with a Strategic Allocation to be delivered in the early part of the new Local Plan to demonstrate that the spatial objectives of HBC can and will be delivered.	
	Richard Wall	Land at Elstree Road and Dagger Lane	Site of 17 hectares bordered by Elstree Road and Dagger Lane put forward for development approval through call for sites for housing. If the submitted site is taken forward it would increase pressure for infrastructure which would be incorporated into plans under the guidance of the local plan. A mixed-use development also to include infrastructure requirements may also be acceptable to the client.	The comments are noted. We have considered all sites put forward through the call for sites and Issues and Options consultation process, and assessed them against our published HELAA methodology in order to judge their suitability for housing or economic development. The findings are published in our HELAA. It should be noted that the process of obtaining planning permission is separate to the call for sites and HELAA process, which forms part of the evidence base for the new local plan. The allocation of a site through a local plan does not replace the need to obtain planning permission.
	Lichfields for CEG	Potters Bar Golf Course	<i>Green Belt</i> 1. mix of the five potential development approaches identified in the I&O document will be required to meet housing need and maintain a supply position within the plan period. To meet the needs of Potters Bar and Hertsmere, it will be necessary for the Council to properly consider development options in Potters Bar, which will inevitably require a review of the Green Belt Boundaries in this location. 2. Potters Bar Golf Course was considered as part of the 2010 SHLAA and through which the site was considered to be deliverable within 1-5 years and achievable. 3. In 2016, Tyler Grange, acting on behalf of CEG, undertook a Green Belt Review of Broad Locations around Potters Bar. The areas of search for 'Garden Suburbs' identified within Hertsmere Issues and Options Public Consultation Planning for Growth (September 2017) fall within Zones 1 and 3 of that study. The CEG Strategic Green Belt Review identified that these zones make a lesser contributions to the Green Belt than land within Zone 2 and concluded that Zone 1 is the best option for Green Belt release. The findings of this Green Belt review are discussed in more detail in the representation. 4. CEG welcomes that the Council has correctly begun the process of a Green Belt review to inform the new Local Plan, in line with the NPPF. 5. The Hertsmere Green Belt Review has assessed the whole of Parcel 47 which contains Potters Bar Golf Course as scoring moderately well against the purposes of the NPPF. Based on this report, comparative to the Potters Bar Golf Course (parcel 47), it is considered that the alternative locations are not as sustainable – in terms of links to public transportation, and employment areas as outlined in Section 5.0 – and as highlighted in both the Council's 2017 Review, and CEG's initial Strategic Green Belt Review, these broad areas have been assessed as making a greater contribution to the purposes of the Green Belt than the Golf Course. 6. The Tyler Grange Green Belt Review has sub-divided the area into three distinct Local Land Parcel. This shows the land within the golf course (Parcels N1 and N2) makes a Low contribution to the Green Belt. 7. CEG considers the council's 2017 GB Assessment supports the conclusions of CEG Strategic Green Belt Review. Therefore Potters Bar Golf Course could sensibly be released from the Green Belt without compromising the purposes of the Green Belt in national policy terms, whilst providing the opportunity to create a well-defined and long-term GB boundary around Potters Bar, which better reflects the shape and scale of the settlement (whilst also accommodating its need for housing). 8. Other factors which can be considered to contribute to exceptional circumstances need to be fully reviewed and considered.	1. The comments are noted. 2. The deliverability of the site will be reaffirmed each time the SHLAA/HELAA is updated based on information provided by the landowner and any other relevant available information. 3. The HELAA process and Stage 2 Green Belt Assessment will inform consideration of any potential Green Belt boundary changes. 4. The support is welcomed. 5. The comments are noted. The HELAA process includes taking into account a site's accessibility and its proximity to local services. A Stage 2 Green Belt Assessment has been undertaken which looks at the Green belt in more detail, and will play a role in deciding which sites are taken through into the next stage of the new Local Plan. 6. The comments are noted. 7. The comments are noted, and in order to present a robust case for Green Belt release the council will be considering multiple factors which may form part of a case of exceptional circumstance through its local plan evidence base.

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			strategic allocations and opportunity sites, and deliverable sites from the previous SHLAA].	3. The identified housing supply is made up of the sources listed in the 2015/16 Five Year Housing Land Supply paper as identified in the representation. It should be noted that a 6% slippage and non-implementation rate based on past trends has been applied to the total deliverable housing land for the five-year period. This approach was accepted by the Inspector at the Examination in Public of the Site Allocations and Development Management Policies Plan in 2016. The allocations in the current local plan will be carried through into the new plan provided they are still deliverable and available. The existing local plan was drawn up with the intention of covering a 15-year period up to 2027, and so some allocated sites are likely to come forward later in the plan period, not all within the first 5 years.
	Planning Potential for Inland Homes Ltd	Land north of Barnet Lane	1. Agree that actual level of housing need should be met as a minimum. However would argue housing need is greater than 600 homes per annum due to need for; a buffer; expected shortfall arising within HMA; addressing London's shortfall; Also argue that identified housing supply of 3,000 is not robust.	1. The comments are noted. Hertsmere has not been approached to accommodate any shortfall arising from Greater London or the rest of the HMA. A local plan which allocates more land than is needed to meet it OAN, especially within the Green Belt, is unlikely to be found sound without any robust evidence of need which could constitute exceptional circumstances.
	Matt Hill – Maddox Planning Consultants for Northern Trust		We support the Council's acknowledgement within the Local Plan that they need to increase the number of new homes built to meet the growing demand and growth forecasts over the next twenty years. This is very pertinent considering the Local Plan already acknowledges that demand for housing in Hertsmere is very high. [Given the assessments in the SW Herts SHMA] are subsequently of the view that there are no reasons as to why the Council should depart from its identified OAN of 600 dwellings per annum and, as a result, it should be planning to meet this need as a minimum through the new Local Plan.	The support is welcomed.
	Francesca Hill – Sworders for Mr and Mrs Monk	Wilton Cottage, Radlett Lane, End Shenley	Disagree. The Council's aim to meet the actual housing need of 600 homes per year is welcomed. 1. Consideration should be given to the Government's new methodology for calculating housing need which is intended to be included in the revised National Planning Framework in Spring 2018. 2. Only planning for 10 years of housing need or not taking into account the likely household need using the new methodology would be contrary to Paragraph 85 as inevitably Green Belt boundaries will need to be revisited when housing need is reviewed for the latter part of the plan period. Indeed, whilst there is no guidance regarding how long beyond the development plan period Green Belt boundaries should remain unaltered it would not be unreasonable to plan for housing beyond 15 years given the certain need to further redefine green belt boundaries to meet housing need in the future. The Council should therefore also, as advised in paragraph 84, consider safeguarding additional land for future development in the longer term.	The support for meeting housing need is welcomed, and the comments are noted. 1. The new methodology for calculating housing need is now in place (albeit likely to be subject to further change) and this will be utilised moving forward. The Issues and Options document crossed over with the Government consultation in its publication, and so we were unable to include reference to any specific figures within this. That aside, the figures being draft means we cannot reasonably be expected to plan based on them until they are fully adopted as they would have no weight in an examination in any case. 2. The council is not proposing to plan for 10 years of housing need so we are not sure where this assertion comes from. Safeguarded land may be considered as part of the plan-preparation process.
	Chloe Tucker – Daniel Watney LLP for The Worshipful Company of Brewers	Land formerly part of Earl and Cross Keys Farm, South Mimms	As the standardisation will have an effect on the OAN figure for Hertsmere, it is advised that drafting the New Local Plan and undertaking site allocation should be delayed until that time. Furthermore, as there is a substantial difference between the current annual housing target and the OAN of the Borough, the Council as Local Planning Authority should be actively seeking all opportunities to deliver housing, in order to exceed their minimum housing target set through the Local Plan. [This is discussed in greater detail in the representations].	The comments on housing supply/need are noted. There is a requirement to demonstrate that work is progressing on local plans. Therefore work on the extensive evidence base which will underpin the new local plan will continue while we await a decision on the new national methodology for calculating housing need. However it is very unlikely that any decisions will be taken or further public consultation work carried out before the new NPPF is published, and so the new methodology will be taken into account at the time it is made available. The council takes decisions on planning applications based on the adopted development plan, unless material considerations indicate otherwise. The council can demonstrate a five-year housing land supply, and the local plan housing target is currently being exceeded. It is for planning applicants to make a case for the need for any housing which is not compliant with current policy on a case by case basis. The

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				council is proposing to plan to meet its new OAN in full through the new local plan.
	Richard Murdock – Woods Hardwick Planning Ltd for Haysgate Plant Hire Ltd		We support the principle that the Council should aim to meet their actual housing need, to be identified through an up-to-date assessment of need. The final figure to be identified should be treated as a minimum and not a maximum. The Council should plan positively and ambitiously to deliver dwellings at rate beyond this identified threshold where this is sustainable. There is increasing pressure on Council's to deliver levels of housing in line with the identified requirements of the Government. This is evident from the publication of the recent Fixing Our Broken Housing Market White Paper, which reiterates the Governments commitment to increasing the delivery of new dwellings. Further, the Government are continuing to publicly state their commitment to speeding up and increasing housing delivery. We therefore urge the Council to be mindful of this in identifying the level of housing growth to be delivered within the new development plan.	The support is welcomed and comments noted. As a council, we are well aware of the increasing pressure from the Government to build more homes, which comes against increasing Government support for the protection of the Green Belt. We will await the update to the NPPF expected in Spring 2018 before taking any decisions on an approach to housing numbers and delivery through the new local plan.
	Sarah Kasparian – Bell Cornwell LLP for Hightown Housing Association	Land at Rossway Drive, Bushey	We support the initial figure of 600 homes per annum over the plan period as a minimum. The Local Plan should provide a more suitable provision of housing land in the borough, which should also have positive implications for the provision of affordable housing. It is inevitable that sites will need to be released from the Green Belt to provide enough housing over the whole plan period.	The support is welcomed and comments noted.
	Sarah Kasparian – Bell Cornwell LLP for DNA Capital LLP		We support the initial figure of 600 homes per annum over the plan period as a minimum, which is in line with the OAN and the Government's draft standardised methodology. The figure should also be reviewed when the revised National Planning Policy framework is published in 2018. It is inevitable that sites will need to be released from the Green Belt to provide enough housing over the whole plan period, which will also be applicable to adjoining authorities including Three Rivers who also have tightly drawn Green Belt boundaries.	The support is welcomed and comments noted. The housing figure will be reviewed in line with the revised Government methodology. The council is working alongside other authorities in the Housing Market Area (HMA), including Three Rivers, on the potential for a joint strategic plan across the HMA.
	Bob Woodman – DP9 Ltd for NBP Limited		Agree	The support is welcomed.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	Disagree. To meet the identified housing need, the Local Plan should seek to deliver 600 homes per annum, however, this should be seen as a target and not a limit; therefore, if suitable sites come forward then planning permission should be approved. To ensure the delivery of housing, particularly in the early years, the Council should look towards the contribution of previously developed land in existing urban areas, particular former employment and industrial sites. One such site is Edgwarebury House Farm, Elstree Hill, which represents previously developed land.	The comments are noted. The council is considering a range of options to facilitate housing delivery across the plan period, including considering the suitability of previously developed land. We have assessed all sites promoted gainst our published HELAA methodology in order to judge their potential suitability for housing or economic development and the findings are set out in the HELAA.
	David Joseph – Bloor Homes	Land at Harperbury Hospital	Disagree. The Plan proposes a sensible starting point for housing provision. However, the expression used suggests an ambition to only meet the suggested 600 dwellings per annum. This does not indicate a positive response to housing needs in an area with acknowledged signs of market stress. Consequently the stated priority aims of the Plan will not be met and the Plan should, at least treat this figure as a minimum. In addition, the existing and imminent under delivery of houses judged against the annual rate needs to be remedied. As such this backlog ought to be addressed as soon as possible. Moreover, the Plan seems to restrict its intentions to local needs. It is correct that the plan ought to consider cross boundary needs particularly where there are synergies between adjoining sites in adjacent authority areas.	The comments are noted. The SW Herts SHMA takes into account the fact that the borough (and HMA as a whole) is highly unaffordable, and that there are high levels of housing demand. These issues have been factored into the overall housing number of 599 dwellings per year. The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA and is already working across the HMA on technical studies.
	Star Planning for D2 Investments Ltd	Organ Hall Farm,	1. The Council's own data identifies that there is a minimum requirement for circa 9,000 dwellings to be delivered over the next 15 years. This is clearly the minimum objectively assessed housing need for Hertsmere District.	The comments are noted. 1. The NPPF states that local planning authorities should use their evidence base to

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			proportion. It seems that the proportion is the Council's starting point, rather than the need. 2. Furthermore, the Council's monitoring of affordable housing is poor and the figures should be published in accordance with the requirements of the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012. Even on previous request for detail of affordable housing completions since 2013, the information has not been made available. 3. If the information is not available what evidence does that Council have to continue to seek the same proportion of affordable housing? Particularly given the recent changes to thresholds and change to the overall housing needs, there needs to be transparency on the provision and completion of affordable housing in the Borough. 4. We suggest retaining the policy requirement that only schemes which have been subject to viability testing should be able to review the proportions of affordable housing. 5. On page 20 of the Sustainability Appraisal, the description of affordable housing needs to take into account the effect of the Ministerial Statement and planning practice guidance on thresholds for seeking affordable housing contributions.	undermine it. Therefore starting from the perspective of need would be unproductive, so instead we are starting from the perspective of a proportion that might be viable on the majority of development sites across the borough in order that some affordable housing may be delivered. Detailed viability work has yet to be carried out. 2. The comments are noted and the council acknowledges that this data has not been published since the 2015/16 AMR. We have recently published a 5-year land supply paper for 2016/17. 3. The council will be carrying out work to monitor policy implementation and to assess the viability of any policies as part of the work on the new local plan going forward. This information will be made publicly available once complete. 4. The comments are noted. 5. The comments are noted.
	Sarah Kasparian – Bell Cornwell LLP for DNA Capital LLP		We support the continued approach to the thresholds for affordable housing and would seek to comply with policy requirements for housing types and tenures as far as possible, noting the close proximity of the site to Hertsmere.	The support is welcomed and the comments are noted.
	David Joseph – Bloor Homes	Land at Harperbury Hospital	Clearly the viability of this requirement will need to be considered alongside any site specific and planning obligations requirements. Nevertheless, the Council ought to be responsive to a comprehensive range of property types and financial models.	The comments are noted and viability will be consideration in determining the eventual affordable housing target for the local plan.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	Subject to viability considerations, a maximum affordable housing provision of between 35% and 40% of new homes to be provided on site would be an appropriate target. However, with the inability to secure affordable homes on sites of less than 10 dwellings and to avoid affordable housing being squeezed by viability considerations, there will be a need for a range of residential allocations of varying sizes and locations across the District to deliver these homes.	The support is welcomed and the comments are noted.
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	Subject to viability considerations, a maximum affordable housing provision of between 35% and 40% of new homes to be provided on site would be an appropriate target. However, with the inability to secure affordable homes on sites of less than 10 dwellings and to avoid affordable housing being squeezed by viability considerations, there will be a need for a range of residential allocations of varying sizes and locations across the District to deliver these homes.	The support is welcomed and the comments are noted.
	Lichfields for CEG	Potters Bar Golf Course	Yes. Subject to viability testing of 35-40% as an appropriate quantum of delivery of affordable housing in Hertsmere.	The support is welcomed and the comments are noted.
5 Self-build homes				
<i>Do you agree that land within larger developments should be available for up to 10% of homes to be self-build properties?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	Disagree It is considered that this would be an onerous requirement on larger developments, and that there is not such a need within the Borough to provide for this level of self-build. The Self-Build and Custom Housebuilding Act of 2015 places a duty on local authorities to keep and have regard to a register of people who are interested in self-build or custom build projects in their area. This would therefore provide evidence of the level of demand. The Council keeps a register, but the Issues and Options Plan provides no evidence from this register to justify the amount of 10%. Any policy for the delivery of self-build plots needs to be clear as to how such a requirement would work alongside the requirement for affordable housing. It is considered that the delivery of self-build plots should be included within the proportion of affordable housing as a type of housing which makes	The comments are noted. The Issues and Options document is aimed at gauging opinion on the topic rather than proposing detailed policy, and the suggestions within it are not fully-evidenced at this stage. Detailed work will be carried out before any self-build policy is put forward through a draft local plan.

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			build plots as part of the affordable housing provision might be a means of addressing this issue. 4. The final point is a requirement for 35%-40% affordable homes and 10% self-build plots directly impacts on the desirability and viability with only 50-55% of the dwellings on a site being capable of being sold as market homes.	any self-build housing policy. There is an expectation that serviced plots for self-build homes would be sold at market value as they are not a form of affordable housing.
6 Gypsies, Travellers Travelling Showpeople				
<i>How should we meet the accommodation needs of Gypsies, Travellers and Travelling Showpeople?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	Await further details from the Council regarding the number of new pitches and approach to delivery.	Further detail on the approach to delivery is expected to be included in the Regulation 19 Plan. Levels of need in the borough are assessed through the recently-published Gypsy and Traveller Accommodation Assessment .
	Ben Rose – Atelier Ten Building Services Engineers		Yes, but this needs to be provided with the required facilities, and the change in law to ensure that if they do set up anywhere else they can be moved on instantly to the designated spaces. Also these shouldn't be in anti-social places, otherwise they won't bother to use them.	The comments are noted. A change in the law is beyond the scope of a local planning authority.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	The provision of accommodation to meet the needs of gypsies, travellers and travelling showpeople, is extremely difficult to achieve, particularly as the operational requirements can often direct these sites to remote locations, which are generally not sustainable locations, and away from existing services, including schools.	The comments are noted.
	David Joseph – Bloor Homes	Land at Harperbury Hospital	We suggest that these needs are met by self-stand proposals which best reflect the functional and social requirements of these groups.	The comments are noted.
7 Other housing need				
<i>How should we meet other types of needs, including housing for the elderly?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	1. The provision of accessible and adaptable homes is provided through the relevant parts of the Building Regulations M4. However, site specific circumstances need to be taken into account and an allowance for exemptions needs to be provided within a policy where it is not practically achievable or financially viable to deliver this requirement. 2. In relation to development for the elderly, the provision of accessible homes will go some way to providing for this age group. If specific specialist accommodation is needed this should be encouraged in the emerging Local Plan, but should not be a requirement of all developments, due to their specific individual circumstances. A set of criteria should be established for the preferred location, mix and tenure for this type of development.	1. The comments are noted. There is no scope for planning policy to exempt a development from fully complying with the building regulations where this is not financially viable, as the two systems operate independently. 2. The comments on specialist accommodation are noted and consideration will be given to establishing criteria for a preferred mix, tenure and type for this accommodation to help ensure it meets local needs.
	Richard House - Gladman Developments		How the plan will support the needs of older people and those with specialist care needs is a key area for consideration, and need to be based on a robust understanding of the scale of this type of need across the borough. The Housing White Paper expects clear policies to address the increasing importance of this issue. Extra care housing is mentioned as offering flexible support and care services on-site to suit the needs of individuals.	The comments are noted. We would agree that looking into how the plan can support the needs of older people and those with specialist care needs is a key area for consideration.
	Ben Rose – Atelier Ten Building Services Engineers		Plan housing for the elderly combined with student accommodation/nursery/schools/community centre so everyone can benefit from the community feel that this would engender, and overcome other social problems likely experienced by many marginalised sections of the community.	The comments are noted. It is agreed that specialist accommodation for older people is best located within a community alongside other forms of development, rather than being isolated. On larger development sites we would be seeking a mix of housing types wherever possible to encourage the formation of mixed communities.
	Sarah Kasparian – Bell Cornwell LLP for Hightown Housing Association	Land at Rossway Drive, Bushey	Hightown Housing Association develop and manage affordable housing of all types but have also identified a great need for affordable housing for the elderly, particularly extra care. This is a form of housing need that the Council should tease out of the general housing need in order to provide a target or indication for the Borough. Due to the tight Green Belt boundaries in Hertsmere, the Council should be considering specific areas where this type of housing could be appropriate. Hightown HA would be pleased to	The comments regarding affordable elderly / extra care housing are noted, and Hightown HA, along with other registered providers, will be consulted on affordable housing policy proposals as progress on the local plan continues.

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			discuss opportunities for such development with the Council at an early stage.	
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	Housing for the elderly should usually be on sites within the existing urban area in order that are widely accessible by public transport and have access to local services and community facilities. In addition, a range of accommodation (e.g. bungalows, nursing homes, extra care and retirement communities) should be provided to meet the different needs of elderly residents.	The comments are noted. It is agreed that specialist accommodation for older people is best located within a community alongside other forms of development, rather than being isolated. On larger development sites we would be seeking a mix of housing types wherever possible to encourage the formation of mixed communities.
	Star Planning for D2 Investments Ltd	Organ Hall Farm, Borehamwood	It may be appropriate to consider the potential to allocate sites for retirement villages. These units would be Class C3 dwellings rather than the residential care homes or extra care housing which would fall within Class C2. Any Class C2 units should not be part of the objectively assessed housing need. Sites suitable for retirement or elderly accommodation should appropriately be identified within the urban area (e.g. as part of the re-use of previously developed or under-utilised land) or the edge of the principal settlements of Borehamwood, Radlett and Potters Bar.	The comments are noted (Bushey is also regarded as being among the principle settlements).
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	It may be appropriate to consider the potential to allocate sites for retirement villages. These units would be Class C3 dwellings rather than the residential care homes or extra care housing which would fall within Class C2. Any Class C2 units should not be part of the objectively assessed housing need. Sites suitable for retirement or elderly accommodation should appropriately be identified within the urban area (e.g. as part of the re-use of previously developed or under-utilised land) or the edge of the principal settlements of Borehamwood, Radlett and Potters Bar.	The comments are noted (Bushey is also regarded as being among the principle settlements).
8 Jobs				
<i>Do you agree that we should plan for this level of new jobs (9,000 new jobs over 15 years) to support business creation and meet the employment needs of an increasing population?</i>				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	Agree The Issues and Options Local Plan highlight the need and opportunity provided by the Borough for employment growth, indicating an increase of around 9,000 jobs across the borough. There is an estimated 10 hectares of extra land required for employment use during the plan period. To accommodate this amount of growth is the accompanying requirement to deliver infrastructure and housing in the most sustainable way. New homes should therefore be located in sustainable locations, adjacent to existing settlements and public transport infrastructure.	The support is welcomed and comments noted.
	Ben Rose – Atelier Ten Building Services Engineers		Yes, but should be higher if can make it a place people commute to also from surrounding villages/areas. The areas described are only accessible by car or a currently inadequate bus service, if at all.	The support is welcomed and comments noted.
	Stephen Rose – Quod for Sellar	Land at Rowley Lane, Borehamwood	Agrees	The support is welcomed.
	Sarah Kasparian – Bell Cornwell LLP for DNA Capital LLP		We agree with the principles and support the allocation of new employment sites. It is not clear what format this would take at this stage given the type of need for small units for start-up businesses. We emphasise the importance of working with neighbouring authorities to deliver expected employment growth in the best locations and of the appropriate scale.	The support is welcomed and comments noted. The council is working alongside other authorities in the Housing Market Area (HMA) on the potential for a joint strategic plan across the HMA and functional economic market area.
	Simon Chapman – Optimis Consulting for Stonefield Investments Ltd	Edgwarebury House Farm, Elstree Hill	Whilst the creation of 9,000 new jobs is supported, this number of jobs should not be seen as a limit and additional jobs should be allowed. In providing new jobs it should be noted that former employment premises may not be suitable for the preferred employment sectors and as such former / vacant employment sites should be released for other uses, including residential, particularly when they are in sustainable locations and can be developed at higher densities.	The support is welcomed and comments noted. Employment allocations are to be reviewed as part of the local plan process.
	David Joseph – Bloor	Land at Harperbury	We appreciate that the Council is seeking to accommodate additional jobs in the area. However, there is no obvious link or explanation how well the Plan correlates housing	The comments are noted. The SW Herts SHMA and Economic Study have been

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			Borehamwood. This approach therefore supports the inclusion of the land to the west of Radlett, extending out to High Cross. This land, including the site at Kemprow, is located along the B462, a main road into Radlett. There is already a frequent (every 10/20 minutes) bus service (398 and 602) that runs along the B462 between Watford, Potters Bar and Hatfield. There are bus stops located along the B462 in close proximity to the land west of Radlett, including in close proximity to High Cross and the site at Kemprow, Radlett Road. The railway station at Radlett provides a Thameslink stop into Central London. The land west of Radlett would be within a reasonable walking/cycle distance of the railway station, with the site at Kemprow being within 1.2 miles walking distance of the town centre and railway station. The land west of Radlett in landscape terms is relatively self-contained through existing landscape features, such as hedge lines and trees. The existing buildings at High Cross would also create a definitive boundary to the larger development and protect development encroaching into the open countryside beyond. Whilst the new garden suburb option envisages the provision of new services and facilities to support the development, it is noted that both Fair Field Junior School and Edge Grove School, are located in close proximity to the new garden suburb location. Although further work would be needed to understand the implications of the larger development at land west of Radlett, there is clearly an option to increase the size and capacity of existing schools if required. The locational advantage of being in close proximity to these services and existing educational facilities provides further positive sustainability credentials for the development of the land west of Radlett, including the land at Kemprow, as a new garden suburb.	development.
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	This option for growth sets out a strategic vision for delivering 300 to 500 new homes per suburb, and also other services and facilities, to accommodate the growth envisaged within each of the new garden suburbs. This planned growth would be most sustainably located around existing settlements, particularly those suburbs that are located nearer to town centres and major public transport hubs, such as Borehamwood. This approach therefore supports the inclusion of the land at Elle Dani Farm to the west of Borehamwood. There is already a frequent (every 6 minutes) bus service (107, 306, 615 and 823) that runs along the B5378 between Watford, Stanmore and Edgware. There are bus stops along Allum Lane at Knowl Way, within a short walking distance of the site. The railway station at Borehamwood provides a Thameslink stop into Central London. The land at Elle Dani Farm would be within an easy walking/cycle distance of the railway station, with the site at Elle Dani Farm being 0.6 miles walking distance (a 10 minute walk) of the town centre and railway station. The site is also closely located to the shops and school located within Elstree which are also within a 10 minute walk. The land at Elle Dani Farm in landscape terms is self-contained through existing landscape features, such as hedge lines and trees. The Elle Dani Farm Garden Suburb Vision document, Transport Feasibility report, and Ecology Note provide further detail about the proposed scheme at Elle Dani Farm to the west of Borehamwood, and highlights why the site is considered one of the most sustainable locations for a new Garden Suburb	The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
	Richard House - Gladman Developments		Can be an appropriate way of delivering sustainable housing development, however reliance on these sites is unlikely to deliver significant amounts of housing in the short term due to long lead-in times. To secure housing delivery within the first 5 years of the plan, a wide range of smaller, readily-developable sites should be allocated.	The comments are noted. The Issues and Options document recognises that a combination of approaches for planning future growth are likely to be needed, and we do not envisage that any of the individual approaches would be taken forward in isolation. We are aware of the lead-in times for large-scale developments such as garden suburbs, and so if that approach were to be taken forward, this would need to be in

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			of travel and focuses development in locations which are, or can be made, sustainable as part of the solutions which are capable of supporting reductions in greenhouse gas emissions and reduce congestion. Development of up-to 1,000 dwellings at Shenley and Elstree is not a sustainable option in accordance with the Framework and should not be pursued. The scale of growth proposed at Shenley and Elstree conflicts with these policies and will inevitable create unsustainable development. Some growth may be appropriate but should not exceed say 100 dwellings at each settlement. The major growth should be directed at the 3 principal settlements, including Borehamwood and Radlett. D2 Investments has not view about where any reduced level growth should be located at Shenley or Elstree.	
	Star Planning for High Moon Developments Limited	Land off Theobald Street, Radlett	In the context of releasing land from the Green Belt for development, the NPPF requires account to be taken of the need to promote sustainable patterns of development, including channelling development towards urban areas inside the Green Belt boundary. The Framework is also clear that this approach facilitates the use of sustainable modes of travel and focuses development in locations which are, or can be made, sustainable as part of the solutions which are capable of supporting reductions in greenhouse gas emissions and reduce congestion. Development of up-to 1,000 dwellings at Shenley and Elstree is not a sustainable option in accordance with the Framework and should not be pursued. The scale of growth proposed at Shenley and Elstree conflicts with these policies and will inevitable create unsustainable development. Some growth may be appropriate but should not exceed say 100 dwellings at each settlement. The major growth should be directed at the 3 principal settlements, including Borehamwood and Radlett. High Moon has not view about where any reduced level growth should be located at Shenley or Elstree.	The comments are noted. The three principle settlements in Hertsmere are Borehamwood, Potters Bar and Bushey, with Radlett being fourth in the settlement hierarchy.
	Pegasus Group for Taylor Wimpey	Land south of Borehamwood	• In preparing the new Local Plan, HBC should consider revising Green Belt boundaries in the context of achieving sustainable development (including the aim of significantly boosting the supply of housing) and the exceptional circumstances test; and • The site makes a limited contribution to Green Belt purposes and accordingly the release of the site would not give rise to significant 'harm' in Green Belt policy terms. The site is suitable for residential development with no insurmountable environmental or technical constraints; • The site is located within a sustainable location, suitable to accommodate new development; • The site is available for development now and is being actively promoted by a willing landowner and developer; • Residential development is confirmed to be a viable opportunity at this site; and • Accordingly, for the purposes of preparing the Local Plan, the site should be treated as a deliverable source of housing land with an expectation of completions achievable in the early part of the plan period (subject to the removal of the Green Belt designation).	The comments are noted. The Issues and Options document acknowledges the very likely need for Green Belt to be released to accommodate housing growth. The comments are noted. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.
15 Other villages				
	Peter Biggs - Preston Bennett for Elle Dani Farm and Dandara Property	Elle Dani Farm, Elstree	This approach will also provide a limited amount of new homes, but provides an opportunity for smaller villages to accommodate a small amount of new development to assist maintain local services, employment, and local communities. This type of village growth should be considered alongside other options, and be seen as additional provision for housing rather than being a primary focus of delivery.	The Issues and Options document recognises that a combination of approaches for planning future growth are likely to be needed, and we do not envisage that any of the individual approaches would be taken forward in isolation.
	Richard House - Gladman		In identifying settlements with the potential for growth the range of facilities within that	The comments are noted. The proximity to existing facilities will be considered as part

Question	Representor (name/company) and client	Site promoted (where relevant)	Details of Representation (summary)	HBC response
			intention to accommodate this growth by allocating further employment land. The 2015 Housing and Employment Land Availability Assessment (HELAA) is equally clear about the shortage of employment land supply in Hertsmere, noting that existing supply is provided largely by six main sites that are designated for that purpose along with a series of smaller designated and non-designated sites. Most are already intensively occupied and have little scope for further expansion. The Site Allocations and Development Management Policies Plan (adopted 2016) identifies the Rowley Lane site as one of two sites safeguarded for future employment development. Sellar therefore strongly supports the aspiration to meet needs in full and to utilise the safeguarded Rowley Lane site to do so.	
	Matt Hill – Maddox Planning Consultants for Northern Trust		In summary, we support the preparation of the Local Plan and the Council's intention to meet its identified OAN of 600 dwellings per annum in the Local Plan. We support the Council's pro-active approach to planning for housing growth and support the provision of new garden suburbs and villages to accommodate the forecasted growth. We also commend the Council in acknowledging that it will need to consider the release of green belt land to enable the development of the new garden suburbs and garden village.	The support is welcomed.
	Chloe Tucker – Daniel Watney LLP for The Worshipful Company of Brewers	Land formerly part of Earl and Cross Keys Farm, South Mimms	Due to the location of the site on the edge of the settlement boundary of South Mimms, we believe there is an opportunity for the site to be released from its greenbelt designation to deliver housing, either as a whole or as separate parcels of land, enabling a sustainable expansion to an existing village. Land at Earl and Cross Keys Farm is considered to be the most suitable site for the expansion of South Mimms village.	Land at Earl and Cross Keys Farm is not within one of the areas of search for growth of key villages shown in the Issues and Options consultation document. The suitability of the sites and whether they should be allocated for development will be considered as part of the process of assessing all sites put forward through the Housing and Economic Land Availability Assessment and in response to this Issues and Options consultation. Initially, sites have been assessed against our published HELAA methodology in order to judge their suitability for development.

Appendix B

Issues and Options consultation (Reg 18, September-November 2017)

Bodies or Organisations representations with HBC responses

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
Part 1				
1 Vision				
<i>Do you agree with the proposed Local Plan Vision?</i>				
	Aldenham Parish Council		1. In general agree with the Vision. 2. Query how better environment will be achieved. What are the implications of energy self-sufficiency? Are wind farms being proposed?	1. Support for the Vision is welcomed. 2. The priorities set out in the Issues and Options document give a flavour of how we envisage this element of the Vision being achieved. Further detail will emerge in future iterations of the draft plan. In terms of energy self-sufficiency we will look at a range of policies and proposals which could contribute in a variety of ways to this aim, taking account of advances in technology and the appropriateness of various solutions to each type of situation.
	LB Barnet		Support intention to meet housing needs of existing and new communities, including appropriate levels of affordable housing and provision for other specific groups at sustainable locations together with required supporting infrastructure.	The support is welcomed.
	Colney Heath Parish Council		Vision is acceptable until you realise it means allocating significant green belt land adjoining Colney Heath for development. Lack of support for Watling Chase Community Forest means Hertsmere has given itself free rein to develop in the green belt.	The comments are noted. No local authority has 'free rein' to develop in the green belt. Any change to green belt boundaries needs to be justified by exceptional circumstances underpinned by a robust evidence base, work on which is currently under way.
	CPRE		1. Should not predetermine the scale of housing development, or how and where it should be accommodated. Too early to say the council favours the construction of a new settlement in the green belt. Council should say that it will apply the government policy and standard methodology. 2. New local plan will have to demonstrate that there are exceptional circumstances, not just a housing/employment need, if green belt boundaries are to be changed to accommodate new development. 3. Number of jobs needed and justified also depends on assessed need and a target set in the light of NPPF para 14 and constraints imposed by national green belt policy.	1. We are required by the NPPF to boost significantly the supply of new homes by (among other things) using our evidence base to ensure that the Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in the Framework. So the clear intention is that full OAN should be met, although it is recognised that there may be circumstances where this is not possible. The council would wish to follow this approach but recognises there are significant constraints to development, including the green belt. In line with the Planning Practice Guidance 'Housing and economic land availability assessment' we have assessed all potential sites put forward through the Call for Sites or in response to this Issues and Options consultation against our published HELAA methodology in order to judge their suitability for development. At this stage it is not possible to comment on the extent to which OAN (whatever that figure eventually is defined as) can realistically be met and what target will actually be set. 2. No decisions about the release of green belt land have yet been taken. A stage 1 green belt review has been undertaken and is to be followed by stage 2 reviews in a number of parts of the borough, which will help to inform decisions about whether/where land may be released to meet identified need. 3. As with housing, it would be the council's intention if possible to meet the OAN, but this has to be viewed within the context of constraints to development, including green belt, that exist and a detailed assessment of all possible sites (see answer to point 1). It is also important that the delivery of new homes and jobs is kept in balance in order to support the development of sustainable communities and avoid the creation of 'dormitory' settlements where residents have to commute long distances to work.
	Environment Agency		1. Disagree with aim to minimise the impact of new development on the environment – should be to improve. Hertsmere's water environment has already been assessed as part of the WFD's River Basin Management Plan and a number of unique actions already exist which can be delivered through planning to achieve water quality and environmental improvements. Plan should promote the improvement and enhancement of the environment	1. The comments are noted and are helpful They will be taken into account in drafting policies for consultation in future iterations of the draft plan. 2. The current SADM allocations identify those that lie within a source protection zone and require a Preliminary Risk Assessment. We will discuss the wording of any appropriate

Question	Representor (name/company) and client	Site promoted	Details of Representation (summary)	HBC response
			4. <u>Children's Services (Schools)</u>: The county council welcomes references to new primary provision in the consultation. 9000 dwellings equates to around 18 forms of entry. At primary level the potential requirements are: <u>Redevelopment of urban brownfield sites</u> Up to 3 x 2FE primary school sites may be required and/or expansion of existing primary schools where possible. <u>New Garden Suburbs</u> The garden suburbs could be more sustainable if they were larger i.e. at least 500 homes. • Three suburbs proposed on edge of Potters Bar at approx. 500 homes each (1500 in total) may generate need for 3FE additional provision. The county council's preference would be for the provision of 2 x 2FE primary school sites, to help support growth in the wider area as well as from the new suburbs. . • Three suburbs proposed on edge of Borehamwood at approx. 500 homes each (1500 in total) may generate need for 3FE additional provision. The county council's preference would be for the provision of 2 x 2FE primary school sites to help support growth in the wider area as well as from the new suburbs. • Two suburbs proposed on edge of Radlett at approx. 500 homes each (1000 in total) would generate need for 1 x 2FE primary school • One suburb proposed on the edge of Bushey at approx. 500 homes would generate need for 1FE additional places. Given the lack of identified expansion potential within the town, the county council's preference would be to secure a 2FE primary school site to both accommodate growth from the suburb and support demand in the wider area. <u>Growth in Elstree Village and Shenley</u> • There is no identified expansion potential at Shenley Primary School, but a relocation and expansion could be explored. The proposed level of housing would mean that a second primary school within the village is unlikely to be sustainable or desirable. • There is no identified expansion potential at Elstree. Growth in Elstree may be able to be accommodated at a new primary school located in a western garden suburb, if it is of sufficient size to serve a wider area (see section 8.8), although consideration will need to be given to how accessible the proposed location would be for primary phase pupils. <u>Meeting the needs of other Villages</u> • Without knowing the location and size of housing numbers it is not possible to set out the level of need arising. It may be possible to meet the demand from expansion of existing schools, or through the new school provision, in neighbouring, larger settlements. <u>New Garden Village</u> • 4 x 2FE primary school sites would be required. • A new 8FE secondary school site would be required to serve the village. The county council's preference to date has been to site new secondary schools within, or on the edge of, existing larger settlements. Co-locating some of the primary provision with a new secondary school (i.e. an 'all through' model) may support sustainability.	

