

**Appendix 22:  
Detailed Summary of  
Duty to Co-  
operate Meeting held on 20  
January 2026 between  
Hertsmere Borough Council,  
London Borough of Barnet,  
London Borough of Enfield  
and London Borough of  
Harrow**



**Hertsmere**

Local Plan

*Delivering a better future*

## **Attendees**

- Planning Policy Officer, Hertsmere
- Planning Policy Team Leader, Hertsmere
- Planning Strategy & Implementation Manager, Hertsmere
- Principal Planning Policy Officer, Barnet
- Principal Planning Policy Officer, Barnet
- Principal Planning Policy Officer, Enfield
- Head of Planning Policy, Harrow
- Planning Policy Team Leader, Harrow

## **Executive Summary**

The Duty to Co-operate meeting between Hertsmere Borough Council and neighbouring London boroughs (Barnet, Enfield, and Harrow) covered updates on local plan progress, evidence base studies, cross boundary issues, and shared challenges. These included technical studies relating to housing delivery, green belt assessment, viability, and HMOs.

Each authority provided an update on the status of their Local Plan. Hertsmere shared the initial findings from several key studies including the settlement hierarchy, retail, viability, local housing needs, Gypsy and Traveler needs, and the Green Belt review. Discussions highlighted significant housing pressures across the area, particularly regarding affordable housing delivery, social rent levels, and challenges with the management of HMOs.

London borough officers provided intelligence on Article 4 Directions, HMO management, and co-living proposals.

The meeting concluded by setting out the next steps for Hertsmere's Regulation 18 consultation, expected in Spring 2026, and agreement to continue email correspondence for ongoing Duty to Co-operate matters.

## **Action Points**

### ***For Hertsmere***

- Continue progressing Regulation 18 Local Plan preparation, aiming for publication during Spring 2026.
- Share further study findings when appropriate (with sensitivity around Green Belt and Grey Belt mapping).
- Seek written comments from neighbouring authorities on emerging study findings.
- Provide transcript and minutes from this and previous Duty to Co-operate meetings.
- Continue outreach to the GLA regarding cross-boundary Green Belt assessment.

### ***For Barnet, Enfield, Harrow***

- Submit any comments regarding the provisional Green Belt, housing needs, or other technical studies once invited.

- Review whether to participate in Hertsmere's viability consultation (where relevant land interests exist).
- Provide any relevant intelligence or policy approaches on:
  - Article 4 Directions for HMOs
  - Monitoring of HMO impact on housing stock
  - Co-living policy implementation and challenges

***Joint / Cross-Boundary***

- Maintain ongoing communication by email for further duty-to-co-operate discussions.
- Re-engage following Hertsmere's Regulation 18 consultation for identification of strategic cross-boundary issues.

## **Detailed Summary of Discussion:**

### **Introduction and Update**

#### **Hertsmere Borough Council**

Provided a welcome and introduction to the second Duty to Co-operate meeting with partners from adjoining London Boroughs.

Introductions followed around the virtual room.

#### **Hertsmere Borough Council**

This was followed by individual up-dates from all present that set out progress on their respect plan-making work.

#### **London Borough of Barnet**

In terms of our update, we, our local plan was adopted in March last year. So at some point this year, we're going to start our early stage review, but we haven't commenced that yet. It is anticipated that work will start sometime in spring, early summer 2026.

#### **London Borough of Enfield**

The Council has concluded the three stages of hearings for the submission version of the new local plan. There a several Inspector's enquiries that remain to be finished. Following that it is anticipated that the Inspector will publish their letter that will set out the remainder of the process. It has been quite intense. Hopefully the latter stages of the examination process and then we expect modifications to be necessary and that would take up a good chunk of this year.

The Inspector has yet to indicate whether the new plan can proceed to main modifications. The Team anticipate that they've got a lot of work still to still to do, so that's sort of where we are and obviously the sort of national policy changes we're sort of keeping an eye on. I'm sure lots of people are.

#### **London Borough of Harrow**

The Council undertook main modifications consultation from November into December 2025, and then the team spent lots of time over Christmas and New Year summarising the representations received. Subsequently, comments were sent off to the Inspector first week of January 2026. The Council will hopefully receive its Inspector's report in February or March 2026, with adoption anticipated to follow before any local elections.

### **Hertsmere Local Plan – Update on Progress**

#### **Hertsmere Borough Council**

The Council has received initial feedback on a number of technical evidence base studies, which have been commissioned to inform the plan-making process. These comprise c.25 separate studies commissioned from AECOM, and four settlement focused visions commissioned from an urban design practice called AR Urbanism.

Recent draft completed studies include -

- Green Belt Assessment (Stage 1)
- Settlement hierarchy
- local housing needs assessment
- Town Centre and Retail study
- Gypsy and Travellers accommodation assessment (prepared by ORS)

These are summarized as follows -

### **Settlement Hierarchy**

The settlement hierarchy continues to demonstrate that Borehamwood remains the primary settlement. The hierarchy continues by identifying Potters Bar and Bushey as the next tier settlements. Bushey is very well connected to adjoining settlements and places including Harrow, Stanmore, and Watford. In addition Radlett is identified as a small town that is well connected to the Thameslink network with good access to St Albans and London. There are further settlements and places that sit below Radlett, these include the villages of Shenley, Elstree, Aldenham and South Mimms. None of these have a train station. Further down is Letchmore Heath and Patchetts Green, which are also small villages.

The emerging local plan' spatial strategy seeks to direct future growth to the Borough's most sustainable locations, which are demonstrably the towns of Borehamwood, Potters Bar, Bushey and Radlett.

Expanding upon the spatial strategy. The four 4 settlements are where the majority of growth will be directed. It's where most of the planned for growth will go during the bulk of the planned period. All those other settlements, some of which are already currently experiencing growth in our local plan vacuum primarily through Section 78 appeals, they will have no/very limited growth directed towards them in the future. They are demonstrably unsustainable locations for future growth. What isn't set out in the settlement hierarchy is the potential long term opportunity that could be provided by a new settlement in the north of the borough at Bowman's Cross. Whilst this opportunity is unlikely to come forward (for delivery) before year 11 of the plan-period.

A number of questions followed from the floor.

It was clarified by Hertsmere Borough Council that there is developer interest in bringing a new settlement forward on the site, the type of quantum they're looking to deliver is probably less than what we could consider with our emerging spatial strategy. In the previous duty to co-operate meeting, the spatial strategy we are looking optimize opportunities being released from the Greenbelt. I think this applies as much to the new settlement as it does to strategic urban extensions around the four main settlements. Green Belt release has to be worthwhile. The new settlement offers an opportunity for securing truly strategic housing supply and delivery that could sustain the step change in both housing supply and delivery well into the next planned period.

The Council considers that the opportunity is equal to a new town rather than a large village in the Greenbelt. It has to be something innovative and embraces

intensification within its quality rather than something that caters for past historic demand.

### **Town Centre and Retail Study**

The Town Centre and Retail Study has confirmed that Borehamwood has the most commercial leisure facilities and Radlett has the least, there's a very low vacancy rate at 0.9%. Borehamwood is the biggest retail town as it is the biggest settlement. It is highlighted that demand from the film and television industry is high but supply is tight.

It is noted that there is currently a limited choice of commercial Leisure uses /experience wise, which contributes towards a trend of residents being willing to travel to Watford and London rather than staying in Borehamwood.

Evidence demonstrates that there is not a huge supply of Grade A supply of offices in Borehamwood, despite it being the Borough's main town.

In terms of town centres, Borehamwood is the strongest as it is the largest in terms of floorspace and geographic area. It is noted that there is a high footfall and strong leisure facilities such as gyms and restaurants. In respect of Potters Bar, Bushey and Radlett town centres there is a very mixed performance. Radlett has the highest vacancies due to it being so small, but the vacancies are not likely to last a long time as there's high demand for shops in the town centre. The retail study is slightly skewed as the settlements are different sizes.

There is high turnover of main town centre uses in Potters Bar. However there is not high vacancies rates. It appears that there is a lot of short term leasing going on, meaning that though vacancies are low, the quality of shop frontages are poor and there's a lot of turnover. Resulting in a lot particularly services like kebab houses and barbers. This is different in comparison to Radlett and Bushey where there is a tight knit community and higher quality shops.

However, the majority of residents are travelling to Watford and London for experiences because there is more on offer.

It was highlighted that the Retail study does not pick up on is how Borehamwood interacts with neighbouring centres in the north London area. It was noted that there are large scale shops and warehouses in Herts mere, which aren't seen in London simply because there is not enough space. These have a large catchment area. These stores consist of large food shops, DIY and hardware stores and industrial employment parks. It was further noted that these uses and their typologies comprise a visibly large proportion of the Borough's urban fabric and a lot of people are prepared to travel to these places. These include large chain stores and not boutiques. It was highlighted that there is no market need for a new food store in Borehamwood. However, there may be a need for additional provision in Radlett.

Finally, it was noted that the Study, and residents, signal that there is demand for improved access to experiential leisure facilities such as cinemas, which could help

make it Borehamwood more of a destination – with increased dwell times (in the Town Centre).

In summary it was highlighted that the outputs from the Retail Study and its twin Economic Study support the spatial strategy's approach towards delivering growth through comprehensive urban/ town centre regeneration. Particularly in terms of the urban regeneration focus that's being directed principally towards Borehamwood, but equally towards Potters Bar. There is an aspect which will feed in to how this influences the settlement policies and settlement branding for Borehamwood, Potters Bar, Bushey and Radlett going forward. In particular how this can influence regenerative growth in existing urban areas and strategic urban extensions to secure the types of retail, cultural and employment offer that allows the residents and communities of Borehamwood and its outlying smaller settlements with offer.

For clarity it was noted that the Borough Council is not pursuing a strategy that actively seeks to raise Borehamwood and Potter Bar beyond their general position within the existing settlement hierarchy or having it directly compete with neighbouring London settlements to the south

### **Whole Plan Viability Assessment**

The emerging Study speaks to the viability of (delivering) the emerging Local Plan in respect of key policy requirements, including affordable housing, BNG and climate standards. This also includes uses such as EUV plus and residual land value test across 40 plus typologies and key strategic sites. It was noted that Hertsmere is a high value area with strong prices, this is reflected in housing prices in Radlett and Bushey.

### **London Borough Land Interests in Hertsmere**

Borough Council Officers noted that at least one organization at the meeting has active land and development interests organisation around this this table does have land interests in Hertsmere. Within the context of the viability work do any authorities around the table want to take part in that if they have developer interests? If they do please contact the Council and we will make it so.

### **Local Housing Needs Assessment**

The Borough's housing need is about 1000 new dwellings a year. This equates to approx. 15,000 dwellings over the local plan period. The Local Housing Needs Assessments identifies a need for about 707 affordable houses per year, which equates to about 70% of all needs, quite a significant amount. There are about 480 households in Borehamwood which are benefit capped. Many are struggling with affordability.

In Potters Bar there is a higher share of older people at 22% and a higher percentage of three bed homes. Borehamwood is the highest proportion of families with children, lowest home ownership. Highest social rent and social rent waiting list. Bushey has a balanced mix of housing stock. There is a borough wide mix of population age, leaning more towards older households. House prices are in line with the borough average, they're not as high as Potters Bar.

Radlett has the highest home ownership of 77%, with the lowest social rent at about 8%. Housing values are high at about £1 million per unit cost. There is also a higher percentage of detached properties.

Rural areas, such as Shenley, South Mimms and Ridge have a similar age profile to the borough. High numbers of 3 bed houses, relatively high prices and reasonable social rent provision.

Overall there is a high need for social housing an affordable housing. High housing prices, especially in Radlett.

### **The Gypsy and Traveller Accommodation Assessment**

The Gypsy and Traveller Study identifies a total need for 132 pitches, 123 pitches for households which meet the PPTS 2024

planning definition, 9 pitches for undetermined households. It is noted that the majority of these will be needed within the first five years of the local plan-period. Within the first seven we will need to provide 75 plots.

The breakdown of the 123 pitch need (in accordance with the PPTS planning definition) is:

- 6 unauthorised developments,
- 28 concealed doubled up households.
- 30 teenagers needing a pitch within five years.
- 11 roadside/displaced in in migration
- 48 new household formations.

### **Green Belt Assessment (Stage 1)**

As an introduction, Borough Council Officers highlighted that at this point in time (January 2026) the initial Green Belt Study outputs provide an early desktop overview that focuses upon performance against the five purposes (as proscribed through national planning policy).

Borough Council Officer spoke to a series of slides. The first of these speaks to Purpose A, which seeks to check the unrestricted sprawl of large built-up areas. There is strong contribution at specific locations. The majority of this contribution is around Borehamwood and the boundary with Barnet. The discussion was opened to participants; to ask questions.

### **Questions:**

#### **London Borough of Barnet**

Has the Borough Council been able to review the work undertaken by the review what the GLA have done in the corner where Hertsmere meets Barnet?

#### **Hertsmere Borough Council**

Officers confirmed that Hertsmere has actively, and repeatedly sought to engage with the GLA, but that they have stated that they do not have the capacity to be engaging with Hertsmere's plan-making process.

## **London Borough of Barnet**

It is further noted that the Hertsmere GBA considers areas (of Green Belt Land) that lies beyond the Borough boundary (within adjoining London Boroughs). That consideration has made an assessment in terms of the contribution made towards the purposes of Green Belt. It is suggested that this will require joined-up working with the GLA.

## **Hertsmere Borough Council**

Noted. In relation to the matter of cross-boundary assessment, the approach which AECOM has taken is that of a logical and justified. Particularly given the line with the administrative boundary takes. It is clear and repeats its self against some of the other purposes were not with London Borough neighbours but certainly in the north with other Hertfordshire neighbours. The alignment with the administrative boundary is there for the assessment only as the Greenbelt its self is not cognisant of the administrative boundary. It is acknowledged that this could align with the GLA (GBA Study), however, it is suggested that the scale of the work the GLA has done is strategic and is itself encompassing all of London, unless they're doing it in some other way. In conclusion, the Council considers that there is justification for taking this approach.

Moving forward, the next slide shows Purpose B, which seeks to prevent neighbouring towns from coalescing with one another. It is noted that the majority of Hertsmere's Green Belt performs strongly along the boundary with London and Watford, as well as between Borehamwood and Radlett.

A brief discussion that related to the Borough Council's ability to share/ publish the outputs followed. The Borough Council suggested that should any of the partners present at the meeting have strong views at this point that they should share those thoughts now – so that any concerns/ opinions be fed into the technical evidence base building process.

Moving on again, the next slide relates to the application of NPPF Footnote 7, which could potentially provide a strong reason for refusing or restricting development within the assessment area. So the constraint of the areas in green and the provisionally constrained are the salmon pink areas on the map shown. It is acknowledged that the requirement around Footnote 7 may “disappear” following the publication of a future new NPPF.

The next slide provisionally identify lands as grey belt in advance for a more detailed specific proposals. The slide shows the majority of it is provisionally constrained which means there is significant amount of potential grey belt. The sensitivity of this output was highlighted.

The draft findings shown on the final slide provide a consolidated map that overlays the various outputs from the study. This shows strongly performing Green Belt (in green), Grey Belt (in grey) and then provisional grey belt (in pink). As shown the majority of the areas outside of the borough which border Barnet, Harrow and Enfield, except for what's happening outside of Potters Bar remains green belt.

Within the borough, unless it's between Borehamwood and Radlett, Borehamwood and Elstree remains greenbelt.

It is anticipated that some of the salmon pink areas may change, or be adjusted, or refined following site visits to the assessment areas. Whilst there is potential for development within those provisional Green Belt areas. That would, with the exception of new development, be contrary to the Local Plan's emerging appropriate special strategy for the borough.

### **London Borough of Harrow**

It is acknowledged that these are the provisional findings. How much further is there to go on this? You mentioned site visits, so they haven't done site visits yet?

### **Hertsmere Borough Council**

The site visits are underway. To provide a few metrics - there are somewhere in the region of 200- 230 site assessments. It will take some time to complete the exercise. The second stage (of the Stage 1 Study) will provide further refinements through site visits.

### **HMO Article 4 Directions**

The Council has raised this as a possible strategic cross boundary issue (in the broadest sense). This is an issue for Hertsmere Borough Council – in respect of both plan-making and decision-taking. Council Officers recognise that there are possible links with wider matters of affordability. In Hertsmere we are seeing a rise in HMOs, the Council is exploring opportunities for an Article 4 direction to manage future delivery.

**London Borough of Harrow** – acknowledge that there has been an increase in the number of/ demand for new HMO's in Harrow. Historically the Borough has not had a policy to manage their delivery but is currently considering the prospect of a borough-wide Article 4 Direction

**London Borough of Enfield** - Enfield has had a borough wide article four direction restricting the s change of use from C3 dwelling houses to C4 HMO's. This has been in place since 2013 October. It remains a challenging development management issue for Enfield even though we have restrictions in place. We still get a high volume of C3 to C4 applications anyway.

**London Borough of Barnet** - Barnet have also had a a borough of wide Article 4 for coming up to 10 years now

that it's been in effect, it was made with non immediate effect and because of we've got a recently adopted plan, that's helped to manage an influx of them coming forward through the planning application route because it's really based ability to demonstrate a need. It needs to be near public transport and it needs to meet with our standards. That's broadly how we're managing the number and the quality. But yeah, we recognise that in right circumstances they are helping to address the housing need.

**Hertsmere Borough Council** – as a footnote, are London neighbours experiencing the phenomenon of proposed large scale Co-Living proposals? The question is raised in the context of north bound rail lines going into Borehamwood and Potters Bar where a few potential future urban regeneration schemes could provide opportunities.

**London Borough of Harrow** – this is certainly an issue, which has been encountered. Many London Boroughs are experiencing many co-living schemes coming forward. We've got what we've hoped to think will be an effective policy in a new local plan. The inspector didn't really change very much about it. It was further noted that many site allocations are being put forward by proponents for Co living and we're just pushing back on that and pushing back on any applications that we can because they are quite often touted as alternatives to HMO's and Members actually quite like that concept. In actuality, when one considers the costs, they're actually not much less than studio apartment or one bed flat and we've got a need for about 80% family size housing in the borough, 3 Bed and above. Loosing sites to 26 square meter spaces doesn't work for us. We will let you know how we go about implementing the policy. If found sound I will let you know.

**Hertsmere Borough Council** – raised the question as to whether partners are measuring the protection of existing housing stock for families against the need for HMO's if they are providing a form of affordable housing? Is there any sort of monitoring in place for that at the moment? Or are there any policies/ upcoming local plans where planning offices are assessing need for HMOs and affordable housing against existing housing stock, conversion and loss?

**London Borough of Enfield** – acknowledged that yes there are. Stated that it is possible to have a metric within policy that specifies an acceptable level of conversion in any street or a metric around clustering of conversions that would be accepted. London Borough of Barnet Officers clarified that this is an approach that they've considered, but have had a policy in Enfield on that since 2014. They further stated that they are seeking to strike a balance – as there is demand/ need for family housing - so, they are to protect family housing, but find the right balance. It's sort of a case by case by case consideration for officers.

### **Next Steps – Communication and Regulation 18**

Going forward, the Borough Council will be in contact via email. We will seek to keep partners up to date on information coming out of the technical evidence base studies. These communications will signal whether further meetings are necessary.

Alternatively, if you need to be in contact with us for any other reason or for your own due to co-operate needs, please let us know and we will do our best to accommodate.

The Council is now working on its Regulation 18 consultation document and that is progressing broadly in line with the adopted LDS. It is anticipated that the Regulation 18 Consultaion Document will be published during Spring 2026 – the Borough Council will be contacting you in advance.

## **Conclusion**

### **Hertsmere Borough Council**

The meeting was drawn to a close. Hertsmere Officers thanked colleagues for their attendance and participation.