

Sustainability Appraisal (SA) of the Hertsmere Local Plan

SA Report

October 2026

Quality information

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Table of Contents

Non-technical summary

1. Introduction	1
2. The plan scope.....	2
3. The SA scope.....	9
Part 1: Work to date	10
4. Introducing Part 1	11
5. Defining growth scenarios	12
6. Growth scenarios appraisal	52
7. The preferred growth scenario	69
Part 2: SA findings at this stage?	70
8. Introduction to Part 2	71
9. The Proposed Submission Plan	71
Part 3: Next steps	78
10. Plan finalisation	79
11. Plan finalisation	79
12. Monitoring	79
Appendix I: Regulatory requirements	80

Non-technical summary

This is the non-technical summary of the Sustainability Appraisal (SA) Report that is published alongside the proposed submission version of the Hertsmere Local Plan under Regulation 19 of the Local Planning Regulations. The primary aim of the SA Report is to present an appraisal of “the plan and reasonable alternatives” in order to inform representations and plan finalisation.

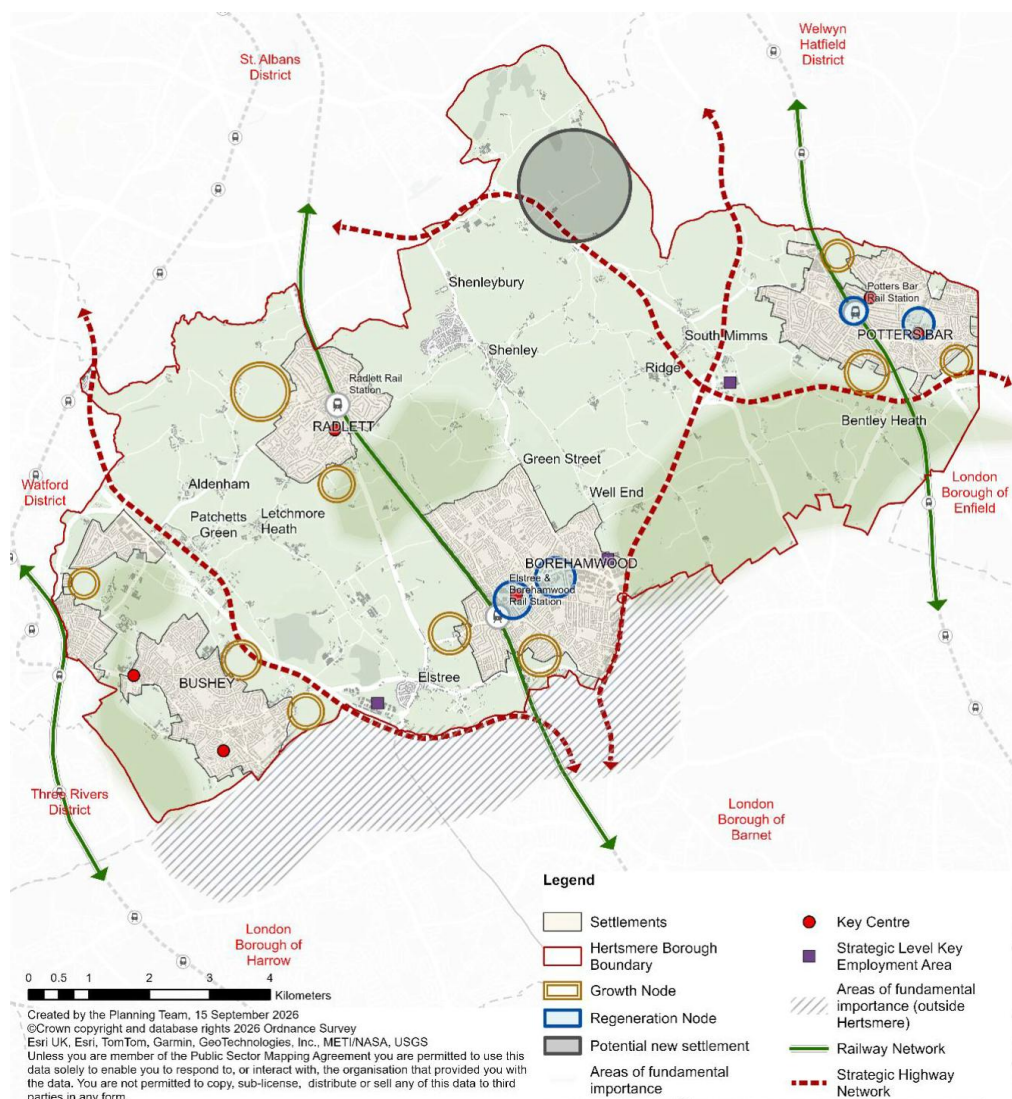
Beginning with reasonable alternatives (RAs), the approach taken is to present an appraisal of RAs in the form of ‘growth scenarios’ defined as alternative approaches to the supply of land, primarily via site allocations, in order to provide for development needs alongside achieving wider plan objectives. In short, growth scenarios comprise more-or-less alternative key diagrams, and a focus on growth scenarios aims to ensure a focus on RAs that go to the very heart of the plan.

Scenario 1 is the proposed submission approach, i.e. the proposed submission key diagram, which is presented below as Figure A. Scenarios 2 to 7 each then involve higher growth via additional allocation of either one or two of the following ‘omission sites’:

- ‘North Borehamwood’ (292 homes) – this site is currently the subject of a live planning application (25/1713/OUT; Land to the west of Green Street and north west of Stapleton Road). It was not shortlisted as a candidate site allocation at the Regulation 18 stage earlier in 2026, but it did feature within the RA growth scenarios at that time.
- ‘North Bushey’ (700 homes) – this site is currently the subject of a live planning application (25/0972/FULEI; Land rear of Farm Way (north)) and was previously shortlisted as a candidate site allocation at the Regulation 18 stage earlier in 2026 (the assumption was 800 homes).
- ‘Well End’ (1,200 homes) – at the Regulation 18 stage earlier in 2026 one of the shortlisted candidate site allocations was ‘Well End Strategic Urban Extension’ (3,750 homes), which more specifically would involve an urban extension to the north east of Borehamwood. However, at the time there were acknowledged uncertainties regarding the appropriate scale, and configuration of growth, accounting for growth opportunities and constraints, and so the option of a reduced 2,000 home scheme was tested through the RA growth scenarios. There are three parts to the site: A) the western part of the site (west of Well End Road) that is being promoted for 1,200 homes and where there is a live planning application for 154 homes (north of Potters Lane); B) the eastern part of the site (east of Well End Road and north of Rowley Lane) that is being promoted alongside (A), but where there appears to be limited commitment to bringing forward a combined / comprehensive scheme; and C) the south east part of the site (south of Rowley Lane and north of land that has permission for an extension to the Sky Studios site to the south) which is being promoted separately for employment land. Overall, at this stage there is a concern regarding sub-optimal piecemeal growth in this area, with opportunities missed in terms of addressing issues and maximising the benefits of growth. As such, the assumption is a 1,200 home scheme in parcel (A), i.e. land west of Well End Road.

In summary, the RA growth scenarios at this stage are:

- Scenario 1 – proposed submission approach (supply = 16,892)
- Scenario 2 – proposed submission approach plus N. B’wood (supply = 17,184)
- Scenario 3 – proposed submission approach plus N. Bushey (supply = 17,592)
- Scenario 4 – proposed submission approach plus Well End (supply = 18,092)
- Scenario 5 – proposed submission approach plus N. B’wood and N. Bushey (supply = 17,884)
- Scenario 6 – proposed submission approach plus N. B’wood and Well End (supply = 18,384)
- Scenario 7 – proposed submission approach plus N. Bushey and Well End (supply = 18,792)

Figure A: Growth scenario 1 (the proposed submission key diagram)

It is considered 'reasonable' to only test alternatives to the proposed submission approach that would involve higher growth via omission sites for three main reasons.

Firstly, there is a case for testing higher growth with a view to a more 'robust' housing land supply on the assumption that the housing requirement is set at local housing need (LHN), which is 975 dwellings per annum (dpa) or 16,575 homes in total over the 17 year plan period (to 2042/43). This is a matter discussed further below.

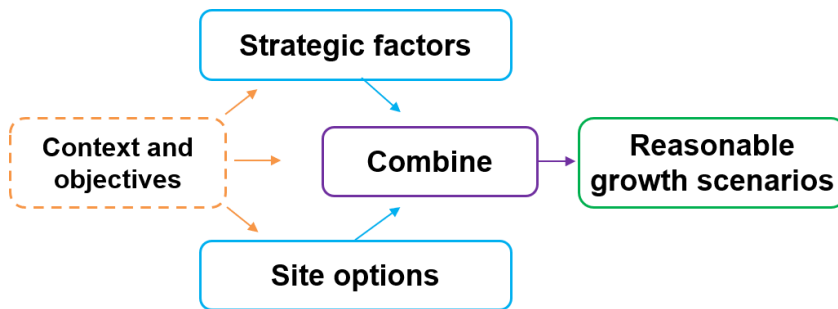
Secondly, there is a case for testing higher growth scenarios that might enable the housing requirement to be set modestly above LHN (e.g. LHN + 5%) as a proactive response to unmet housing needs in the sub-region (notably Three Rivers District, but also London) and/or affordable housing needs in Hertsmere (which would not be met in full under Scenario 1).

Thirdly, at this stage none of the proposed allocations under Scenario 1 stand out as challenging in suitability terms to the extent that there is a clear need to test scenarios involving 'non-allocation'. At the previous stage scenarios were tested involving non-allocation of Bowmans Cross new settlement; however, at this stage it is considered to be suitably strongly performing, including because the latest understanding is that it can deliver 2,500 homes in the plan period (the previous assumption was 500 homes), such that it is centrally important to the Local Plan.

A final point to note, regarding the process to define RA growth scenarios, is that there is feasibly a 'highest growth' scenario involving allocation of all three of the variable omission sites (supply would amount to 19,084 homes, i.e. LHN plus 15%). However, this scenario is not tested on balance, partly because there is limited case for this level of growth, but also as a pragmatic step aimed at keeping the scenarios to a manageable number. It is discussed further below.

Overall, the 7 scenarios are considered to be reasonable at this stage in the process, i.e. given the evidence-base and understanding that has built up over a plan-making process stretching back to 2017 (including more-or-less draft plan consultations in 2021, 2024 and 2026). A detailed process to define the RA growth scenarios is set out across Section 5 of the main report, which gives ‘top down’ consideration to strategic factors and ‘bottom up’ consideration to available site options, before then combining factors at the settlement level to define settlement scenarios, and finally combining the settlement scenarios to form RA growth scenarios for the Borough as a whole. This process is *as per* the equivalent process set out in Section 5 of the Interim SA Report from the Regulation 18 stage in early 2026, and is summarised in the figure below.

Figure B: Summary of the process to define RA growth scenarios



Having worked through the process to define RA growth scenarios in Section 5 of the main report, the appraisal is then presented in Section 6. The appraisal involves a narrative discussion under the ‘SA framework’, which is a list of sustainability topics (presented in alphabetical order), each with an associated objective, with the SA framework having been developed through ‘scoping’.

The appraisal concludes with a summary appraisal ‘matrix’ with a row for each of the SA topics and a column for each of the scenarios. The aim of the appraisal matrix is to provide an ‘at a glance’ understanding of how the scenarios perform both in absolute and relative terms.

The appraisal matrix is presented below, where each row aims to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green**.¹

The appraisal shows there to be a clear case for supporting Scenario 1 (the proposed submission approach), in that it is ranked first under the greatest number of sustainability topic headings. However, other scenarios perform better in terms of the number of predicted positive effects.

Also, it is important to be clear that the aim of the appraisal matrix is not to directly enable a conclusion on which of the scenarios performs best on the basis of a numerical exercise of assigning points. This is because the appraisal is undertaken with no assumptions made regarding the degree of importance (‘weight’) that should be assigned to each of the topics as part of decision-making (and, to be clear, the topics are not assumed to have equal weight).

It is for the Council to assign weight and reach a decision ‘on balance’ regarding which of the scenarios is best performing / best represents sustainable development.

Also, it is important to be clear that the appraisal conclusions, as shown in Table A, are reached on the basis of a range of assumptions, and there are inevitably uncertainties regarding the ‘on the ground’ effects of each of the scenarios given the available evidence base (including noting that a number of important evidence base workstreams remain ongoing at the time of writing).

As part of this, one key point to note is that there are uncertainties under Scenario 1 on the basis ‘tight’ and potentially challenging housing land supply. Specifically, whilst total plan period supply under Scenario 1 (16,892 homes) is 2% higher than plan period LHN, which would be set as the housing requirement, there are risks around the potential to maintain a rolling five year housing land supply (5YHLS), as measured against the housing requirement (975 dpa), over the early years of the plan period ahead of a further supply boost through a new local plan.

¹ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

This is an important consideration because the lack of a 5YHLS leads to ‘evidenced unmet need’ and, in turn, a situation whereby the presumption in favour of sustainable development (or ‘tilted balance’) is engaged (Policy S3 of the 2026 NPPF) and the Council struggles to resist ‘speculative’ planning applications (i.e. applications that do not align with the Local Plan) with negative implications for sustainability objectives. Uncoordinated speculative applications gaining permission has been a key issue over recent years, and this situation will continue ahead of adopting a local plan, likely creating issues for settlements and the Borough over coming years.

There could be the potential to reduce concerns via an upward ‘stepped’ housing requirement, i.e. one that is lower in the early years of the plan and then commensurately higher in the later years of the plan, but the potential for a stepped requirement is unclear at this stage.

Table A: Growth scenarios summary appraisal

	Scenario 1 -	Scenario 2 N. B'wood	Scenario 3 N. Bushey	Scenario 4 Well End	Scenario 5 N. B'wood N. Bushey	Scenario 6 N. B'wood Well End	Scenario 7 N. Bushey Well End
Higher growth at...							
Air quality	=	=	=	=	=	=	=
Biodiversity	★1	★1	2	★1	2	★1	2
Climate change adaptation	=	=	=	=	=	=	=
Climate change mitigation	=	=	=	=	=	=	=
Communities 1: Education	2	3	2	2	2	2	★1
Communities 2: Services	?	?	?	?	?	?	?
Communities 3: Health	=	=	=	=	=	=	=
Communities 4: Cohesion	★1	2	2	2	2	2	2
Economy and employment	=	=	=	=	=	=	=
Historic environment	2	★1	2	2	2	2	2
Homes	6	5	4	3	3	2	★1
Landscape	2	2	★1	2	2	2	2
Soils / resources	=	=	=	=	=	=	=
Transport	?	?	?	?	?	?	?
Water	★1	2	3	4	5	6	7

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

- **Air quality** – there are no air quality management areas (AQMA) in the Borough although there are a number of traffic congestion hotspots where air quality is potentially problematic or could become problematic under growth scenarios, including acknowledging the likelihood of significant growth in neighbouring areas, including a potential new town at Crews Hill (Enfield). Higher growth could lead to challenges, but equally the baseline situation is one whereby air quality is improving nationally. Also, there is a need to recognise that Hertsmere is generally well-connected in transport terms, that air quality is more of an issue in some neighbouring areas (notably Watford and all neighbouring London Boroughs) and that unmet housing need within any sub-region is problematic for strategic transport planning. Overall, it is difficult to confidently and meaningfully differentiate between the growth scenarios.
- **Biodiversity** – the Borough is overall subject to limited biodiversity constraint, such that there is a case for higher growth, but the primary factor that dictates the order of preference is the approach to growth at Borehamwood. Specifically, one of the two variable sites, namely 'North Borehamwood' (292 homes) is currently designated as a Local Wildlife Site (LWS), although at the time of writing this designation is being reviewed through the planning application process. At 'North Bushey' (700 homes) there is an adjacent LWS, which would be protected and enhanced, although there would be recreational pressure, and the potential to amend the masterplan (as understood from the current planning application) to better connect the LWS to the large area of parkland in the north of the site might be considered. At 'Well End' (1,200 homes) there is overall limited biodiversity constraint, but there is a dense network of historic field boundaries, and a related network of surface water flood zones. Also, the concern here is sub-optimal piecemeal growth with opportunities missed to deliver new strategic green and blue infrastructure to deliver on the objectives of the Local Nature Recovery Strategy (LNRS). On balance, the appraisal conclusion reflects a particular concern with 'North Borehamwood'. With regards to significant effects, a key consideration is that strong viability supports a proposed policy requirement for 20% biodiversity net gain; however, on balance neutral effects are predicted, including as 20% could be challenging at some sites on viability grounds.
- **Climate change adaptation** – the key issue here is flood risk, although it is acknowledged that the matter of overheating risk is also a significant consideration for the Local Plan given the high urban growth strategy that is assumed as a 'constant' under all of the scenarios. Focusing on flood risk, whilst this has fed-in strongly as a factor influencing the selection of sites for inclusion within the growth scenarios, and a Level 2 Strategic Flood Risk Assessment (SFRA) has been completed, there are still a number of sites within Scenario 1 (i.e. sites that are a 'constant' across the scenarios) with an element of risk. These are mainly urban sites, where past lower intensity uses may partly be a reflection of flood risk but where there is now a wider sustainability case for intensifying uses, including given the potential to address flood risk through design and construction measures. With regards to the three 'variable' omission sites that feature across the scenarios, all are subject to a degree of surface water flood risk, but it seems unlikely that this would act as a significant barrier to effective masterplanning or unduly affect site viability, given the potential to design-in green / blue infrastructure and high quality sustainable drainage systems (SuDS). At all three sites, potentially most notably the sites at Borehamwood, downstream surface water flood risk affecting existing residential areas is a consideration, but high quality SuDS can typically ensure 'greenfield runoff rates'. Overall, whilst the Environment Agency raised limited concerns in respect of flood risk through the recent consultation, it is appropriate to flag a 'moderate or uncertain' negative effect ahead of further consultation informed by the Level 2 SFRA and sequential test outcomes.
- **Climate change mitigation** – the focus under this topic heading is per capita built environment decarbonisation, given that transport decarbonisation factors-in under the 'transport' heading. Development viability is generally strong in Hertsmere, which suggests good potential to deliver 'net zero' developments, and this is the proposed overarching policy requirement within the proposed submission plan. However, viability varies significantly between sites, in particular urban versus non-urban sites, as discussed in the Viability Study (2026), with the implication that there will likely be some sites that cannot deliver 'net zero' development in practice without compromising on wider objectives (e.g. affordable housing).

On the other hand, it is acknowledged that there is a broad climate change mitigation / decarbonisation case to be made for a high urban growth strategy, as discussed within the series of Climate Change Studies (2026) that have been completed in support of the plan. Also, there is support for the proposed significant focus of growth at Radlett because viability here is very strong, such that there is excellent potential to deliver 'net zero' developments.

With regards to the three sites that are a variable across the scenarios, none are thought to be proposing 'net zero' development, and overall it is not clear that any are associated with a particular built environment decarbonisation opportunity. At Well End there could feasibly be 'net zero exemplar' opportunity to be explored were there to be support for a large-scale strategic urban extension in this area, but there is uncertainty ahead of detailed work to consider development costs (e.g. major transport upgrades) and, in turn, viability 'headroom'.

Overall, it is not possible to differentiate between the scenarios and a 'neutral' effect is predicted. This contrasts to the 'moderate or uncertain' negative effect previously predicted within the Interim SA Report earlier in 2026, reflecting the detailed work that has since been completed, namely the series of three Climate Change Studies and the Viability Study.

- **Communities 1: Education** – the Interim SA Report (2026) stated: "... secondary school capacity has long been understood to be a key issue for the Local Plan, but planning for secondary school capacity is challenging, both because it is difficult to identify preferred locations for new and/or expanded schools and because the baseline situation is constantly shifting as neighbouring areas explore growth scenarios and consider potential locations for new schools (in particular, the latest situation is that the St Albans Local Plan is near finalisation, and proposes a new secondary at London Colney, and the Three Rivers Local Plan is nearing finalisation and proposes a new secondary at Carpenders Park)."² It will be for Hertfordshire County Council (HCC) to comment in detail (once again) through the current consultation, but the current appraisal aims to flag support for strategic growth at both Borehamwood and Bowmans Cross (in particular) given potential to deliver a new secondary. It is also important to note that the approach to growth at Radlett is held 'constant' across the growth scenario on balance, with the settlement notably lacking a secondary school."

The latest situation is potentially improved because there is the *potential* for a strategic urban extension to Radlett (held constant across the growth scenarios) to deliver a secondary school. This could be a major benefit, but there remain major uncertainties. Otherwise there are thought to be limited concerns regarding schools capacity, in light of the Infrastructure Delivery Plan (IDP), but secondary school capacity is also an ongoing consideration for Borehamwood, and schools capacity in support of high urban growth can be a challenge.

With regards to the three variable sites, 'North Bushey' would deliver a new primary school (specifically, land would be made available), which is considered to be a significant benefit. Also, at 'Well End' the current proposal is to deliver a special educational needs school, but the concern is that growth at this scale should also deliver a primary school. Also, the site promoters have provided a concept masterplan for a much larger scheme that would not deliver a primary school. The site does benefit from good access to existing schools, including a secondary, but large strategic urban extensions are an opportunity to deliver new capacity.

- **Communities 2: Services** – the Interim SA Report (2026) stated: "... planning for healthcare is challenging because the NHS requires flexibility such that it can be difficult to be certain that land provided will ultimately be taken up. Having said this, what can be [said] is that strategic growth locations give rise to an excellent opportunity to deliver new healthcare facilities, and overall there are not known to be any significant concerns under any of the scenarios. The other key consideration is then town centre regeneration, which is assumed as a 'constant' under all scenarios. There is very strong support for the ambitious regeneration strategies, informed by ongoing visioning and wider workstreams."

At this stage a key consideration is the proposed town centre regeneration strategies for both Borehamwood and Potters Bar, with it being the case that detailed work is ongoing but overall there is uncertainty regarding what can be viability achieved (and when). This leads to an 'uncertain' appraisal conclusion.

² "There may also be some challenges in respect of primary school capacity, particularly in terms of maintaining the ongoing viability of schools in light of an ageing population at certain villages, notably Shenley and South Mimms."

With regards to the three variable sites, it is not clear that there is an opportunity to deliver a new health facility (this would certainly be an opportunity to explore were the assumption to alternatively be that 'Well End' would deliver as a larger strategic urban extension). There is also potentially a concern regarding higher growth from greenfield sites at Borehamwood serving to divert investment from town centre regeneration, but this is highly uncertain.

- **Communities 3: Health** – the Interim SA Report (2026) stated: *“... there are also many wider ways in which the Local Plan influences the determinants of good health. One key matter for consideration relates to strategic planning for green and blue infrastructure, both within and outside of development sites, and also the related matter of ensuring that sites are masterplanned and designed with good health as a priority objective. In this regard it is fair to say that a priority objective is simply adopting a Local Plan such that growth comes forward in a plan-led way, as opposed to the baseline situation whereby growth continues to come forward in a piecemeal fashion in the absence of an up-to-date Local Plan with issues arising and opportunities missed in respect of planning for health.”*

Focusing on green and blue infrastructure, at the current stage there is broad support for the proposed submission approach (Scenario 1), including the new focus on coordinated strategic growth at Radlett and the adjusted proposal for a strategic urban extension to the west of Borehamwood. With regards to the three variable sites: A) 'North Bushey' would deliver significant new areas of accessible greenspace; B) 'North Borehamwood' has good access to the countryside; and C) 'Well End' represents an opportunity to design-in high quality green / blue infrastructure, although the concern is that opportunities may not be fully realised, given the concept masterplan submitted by the site promoter and given a risk of piecemeal growth. On balance, the scenarios are ranked on a par and neutral effects are predicted.

- **Communities 4: Cohesion** – the Interim SA Report (2026) stated: *“... it is difficult to confidently and meaningfully differentiate between the growth scenarios. A key issue is an acknowledged local concern with large scale housing growth; however, on the other hand, A) the baseline is a situation whereby growth continues unabated under the presumption in favour of sustainable development (an essential component of the plan-led system under the NPPF, with the aim being to motivate local authorities to maintain an up-to-date local plan); and B) under the lower growth scenarios it could potentially prove challenging to progress the local plan as objectors might argue there is insufficient supply.”*

At this stage it is considered reasonable to flag support for Scenario 1, recognising that this is the outcome of lengthy process of iterating the emerging draft local plan, and recognising that the three variable sites that feature across Scenarios 2 to 7 all generate community concerns (albeit this is likely partly due to all being the subject of current planning applications). This is notwithstanding that there remains a strong 'communities' argument for adopting a Local Plan with a robust housing land supply to expedite plan adoption and ensure that the Council can maintain a rolling 5YHLS moving forward and therefore avoid 'evidenced unmet need'.

- **Economy and employment** – employment land needs would be provided for in full under Scenario 1 and none of the three variable omission sites that feature across the higher growth scenarios would deliver significant new employment land. At Well End a comprehensive approach to growth in this area could potentially unlock / facilitate delivery of new strategic employment land to the south of Rowley Lane (north of Sky Studios planning permission); however, there are no clear proposals for a comprehensive strategic urban extension of this nature, nor is there a clear need to for additional strategic employment land. Finally, whilst there is a case to be made for higher growth to deliver additional homes in support of a skilled local workforce, it is not clear that this is a significant consideration.
- **Historic environment** – constraints are widespread but concerns with growth are limited, including as understood from recent Historic Impact Assessments (HIAs). High urban growth generates limited concerns, given that Borehamwood and Potters Bar are mainly 20th century towns (although Historic England flagged some issues through their consultation response); and at most of the proposed greenfield urban extensions under Scenario 1 there is notably low constraint or clearly good potential to avoid/minimise impacts through masterplanning. A key site of note is the proposed urban extension to the west of Borehamwood, which would involve significant encroachment towards Aldenham House Registered Park and Garden (Grade 2) and the Elstree Village conservation area, and where mitigation could be challenging (including noting other nearby sites, and uncertainties regarding how to masterplan the site to achieve a comprehensive scheme, noting a pending planning application within the site).

With regards to the three variable sites, all are subject to limited constraint, with 'North Borehamwood' particularly standing out in this regard. At 'North Bushey' there are heritage assets nearby within the sensitive gap between Bushey and North Bushey, but there appears to be good potential for mitigation, to include a large new area of accessible greenspace that would make good use of an area of former parkland. At 'Well End' there are limited concerns on the assumption of a 1,200 home scheme, but the risk is an expanded scheme that encroaches towards a landscape associated with a number of listed buildings and historic lanes, and a concern could be problematic 'rat running' through village conservation areas.

- **Homes** – as discussed, there is a case for higher growth with a view to boosting the housing requirement and/or ensuring a more robust supply headroom over-and-above the requirement, particularly in the crucial early years of the plan period. With regards to the supply trajectory under Scenario 1, whilst this is the outcome of detailed work to consider the capacity and delivery trajectory of sites, there do remain uncertainties regarding a number of challenging urban sites, including some that are relied upon to contribute to 5YHLS in the earlier years of the plan period. Also, delivery of 2,500 homes at Bowmans Cross is somewhat uncertain.

It is also important to acknowledge that urban regeneration sites often struggle to deliver affordable housing (as discussed in the Viability Study, 2026) and, indeed, it is often the case that urban / brownfield sites are unable to viably deliver any affordable housing (at least at the current time, acknowledging that development viability could well improve over the plan period to 2043). With regards to the three variable sites, all are greenfield sites without any apparent abnormal development costs, such that they could likely deliver the full policy quote of affordable housing (certain of the sites are proposing 50%). Furthermore, all are currently the subject of pending planning applications (in whole or in part), which is strongly suggestive of good potential to deliver in the crucial early years of the plan period.

In conclusion, the highest growth scenarios are very strongly supported as there would be the potential to set the housing requirement modestly above LHN and with a robust supply headroom, including in the earlier years of the plan period (a stepped requirement could be considered to ensure this, involving conservative assumptions regarding the timing of urban supply). A housing requirement set above LHN would represent a positive response to unmet housing need in the sub-region and/or a positive response to affordable housing needs (under Scenario 1 around 70% of housing would need to be 'affordable' in order for needs to be met in full, which is not achievable). Under Scenario 1, whilst supply over the plan period matches the housing requirement (indeed exceeds it by 2%), and there could be a 5YHLS at adoption (noting the potential for additional supply from pending planning applications), there remain uncertainties in both regards, due to reliance on challenging urban sites. One notable quote from the Viability Study (2026) is: *"... the delivery of the Tesco / Canada life site is likely to be challenging – like the other flatted typologies... it is recommended that the Council engages further with the promoters of the potential strategic sites... and only includes these sites in the new Local Plan if they can be demonstrated to be viable."*

Finally, there are significant concerns regarding the lack of identified sites to provide for Gypsy and Traveller accommodation needs. 'Well End' is a good example of a strategic site that could be suited to delivering a Gypsy and Traveller site, e.g. to contribute around 15 pitches to the overall identified need for between 123 and 132 pitches over the plan period.

- **Landscape** – the Interim SA Report stated: *"... whilst there are no designated landscapes... there is a widespread concern regarding creep of the London suburbs into Hertfordshire, generally loss of open countryside that is highly appreciated and loss of settlement separation. Concerns can be flagged at all settlements, but the appraisal aims to reflect a view that... Bowmans Cross represents a means of delivering growth in line with landscape objectives."*

At the current stage there is new evidence in the form of a Landscape Impact Assessment (LIA, 2026), which identifies that around half of the proposed greenfield allocations under Scenario 1 have 'moderate' sensitivity with the others having 'moderate-high' sensitivity. With regards to the three variable sites: A) 'North Borehamwood' is associated with rising land but potentially has limited sensitivity on the assumption of a well-contained scheme (the LIA concludes 'moderate-high' sensitivity for a much larger parcel that stretches all across the entire northern edge of Borehamwood); B) 'North Bushey' has 'moderate' sensitivity, and whilst this is a sensitive Green Belt gap there appears to be good potential to secure a long-term defensible northern urban edge to Bushey; and C) 'Well End' has 'moderate' sensitivity but, and as discussed, there is a concern regarding sub-optimal development creep / sprawl.

On balance, it is considered reasonable to highlight 'North Bushey' as a site subject to relatively limited landscape constraint, and where there is good potential for containment.

- **Soils / resources** – agricultural land quality is not particularly high in the Borough although there is a notable concentration of 'best and most versatile' agricultural land in the vicinity of North Bushey and Radlett, including a band of grade 2 quality land to the south of Radlett that intersects one of the proposed urban extensions that is a constant across the scenarios. All three of the variable sites that feature across Scenarios 2 to 7 likely comprise grade 3b quality land (not best and most versatile), although if 'Well End' were to expand east of Well End Road then this would involve encroaching into an area associated with grade 3a quality land.

Another point to note is support for a focus on urban growth and also several greenfield sites comprising degraded land or golf courses. Finally, minerals and waste planning is a significant factor in parts of the Borough including Bowmans Cross (with potential implications for timing).

- **Transport** – the Interim SA Report (2026) stated: *"... the Borough is overall very well connected and there are major opportunities to deliver growth in proximity to a well-connected railway stations, along bus corridors and along priority routes identified in the Draft Local Cycling and Walking Infrastructure Plan (LCWIP, 2026). Also, there are significant opportunities to deliver large-scale strategic sites that can deliver strategic infrastructure upgrades and will benefit from a high degree of trip internalisation. However, the emerging preferred growth strategy is a major step-change on that previously consulted-on in 2024, such that it will be crucial to work closely with HCC, National Highways and others ahead of plan finalisation, including informed by transport modelling."*

Transport work remains ongoing at the time of writing, such that there is a need to conclude considerable uncertainty and, taking a precautionary approach, to flag a 'moderate or uncertain' negative effect across the scenarios. The three variable sites are in reasonably accessible and well-connected locations, but there is a need to consider the cumulative effects of growth for road traffic and, in turn, the ability to support high quality bus services and safe walking and cycling. At 'Well End' there is a clear need to ensure a comprehensive approach to growth that realises opportunities to deliver new and upgraded transport infrastructure, to avoid problematic traffic congestion, support modal shift away from the private car and ultimately to ensure growth in line with 'vision-led' transport planning principles.

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

At the time of writing a Water Cycle Study (WCS) Scoping Study has been completed that does flag concerns regarding capacity at Maple Lodge STW, including having factored in consultation responses. It also highlights that the proposed level of growth is in excess of that anticipated by the water company when preparing its Water Resource Management Plan (WRMP), which deals with the supply of water, but it is understood that there are no major concerns regarding the supply of water over the plan period (including from a perspective of avoiding low water levels impacting the water environment). A final WCS is in preparation at the time of writing, and it may be that through detailed investigation it can be determined that there is capacity at Maple Lodge STW to accommodate the proposed housing land supply trajectory. However, on balance, a significant concern is flagged for higher growth scenarios.

Finally, in respect of the appraisal of RA growth scenarios, there is a need to return to the possibility of a 'highest growth scenario' involving Scenario 7 plus an additional 292 homes at North Borehamwood. This scenario would broadly perform as per Scenario 7, but there would be incrementally additional concern in respect of 'water' and there would be clear additional support for this scenario in terms of 'homes'. North Borehamwood is in close proximity to Well End, and there could be challenges to bringing the two sites forward in combination, but it is not clear that these would be significant, and there could be in-combination opportunities to explore, notably in terms of delivering new or upgraded transport infrastructure and supporting bus connectivity.

Having appraised the RA growth scenarios, the Council responded to the appraisal setting out reasons for supporting Scenario 1 on balance as an appropriate and ultimately 'justified' strategy (NPPF para 36). The Council's statement is as follows:

Scenario 1 is taken forward as the basis for Proposed Submission Local Plan that is currently published under Regulation 19. The appraisal shows it to perform suitably well, such that officers believe it to be: *“Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”* (NPPF para 36).

It is acknowledged that there is a ‘homes’ argument for supporting certain of the alternative scenarios, but under Scenario 1 the housing requirement would be set at local housing need (LHN), including from the start of the plan period, and the identified housing supply should be sufficient to ensure a rolling five year housing land supply (subject to ongoing work in the usual way). There is no clear case to be made for a housing requirement set above LHN, e.g. in the absence of clear evidence that Hertsmere should accommodate unmet housing need from Three Rivers. With regards to affordable housing, there is set to be a major step change in delivery over the plan period, and it is difficult to conclude a clear case for a housing requirement set above LHN in order to make marginally higher provision for affordable housing. The clearest case for higher growth is in respect of ensuring a more robust housing land supply, i.e. with a view to boosting certainty regarding maintenance of a 5YHLS.

In addition to the appraisal of RA growth scenarios, the other key task for the SA Report is to appraise the Proposed Submission Local Plan as a whole, factoring the suite of proposed policies that will be in place to guide planning applications, in particular site specific policies (noting that Borough-wide policies risk having limited weight if they conflict with the new NPPF).

As part of this, there is a need to scrutinise proposed policy requirements in light of the Viability Study in terms of: A) the balance struck between competing policy priorities within viability parameters; B) ensuring that the cumulative burden of DM policy requirements does not risk impacting site deliverability; and C) ensuring that DM policies do not lead to false comfort, including regarding affordable housing, biodiversity net gain, net zero development and funding for infrastructure from CIL and S106. Compromises can and often are made at the planning application stage on viability grounds, plus there is the context of the new NPPF (2026) in terms of ‘national development management policies’ and a ‘default yes’ / ‘universal tilt’ in urban areas.

Overall, whilst there is broad support for the suite of borough-wide development management (DM) policies, which have been developed iteratively via consultation and informed by a range of detailed workstreams, and there is also support for the town-specific policies (particularly in respect of town centre regeneration in Borehamwood and Potters Bar), an issue is that the site-specific policies are somewhat high level. Further work could be undertaken to prepare concept masterplans for select key allocations, and to add detail to policy requirements aimed at ensuring that the sites are allocated with a good degree of confidence regarding what can and cannot be achieved within viability parameters. The two primary cases in point are:

- HRA6 Kemprow Farm, Watford Road, Radlett – this is the second largest allocation after Bowmans Cross, and is one of only a small number of proposed Green Belt allocations where work is yet to be undertaken on a planning application. A key issue is understanding the potential to deliver onsite school capacity, potentially to include a secondary school to (potentially) meet the established need for a new secondary in the west of the Borough. It could transpire that delivering a school could affect site capacity and/or necessitate comprising on wider objectives, which are matters that could be further explored. The site is expected to begin delivering within 5 years but there could be a need for work on land equalisation.
- HBA15 Golf Course Site and North of Allum Lane, Borehamwood – it appears likely that the northern part of the site would need to achieve access from the southern part, but the southern part is the subject of a pending planning application, which clearly presents a challenge, yet the site is expected to begin delivering within the first five years of the plan. There is more broadly a need to ensure a comprehensive approach to growth to the west of Borehamwood, including from a Green Belt perspective, and these are matters that could be explored further with a view to added DM policy detail aimed at ensuring successfully delivery.

The overall conclusion is that the plan as a whole performs as per growth scenario 1 (see above).

Finally, the SA Report discusses next steps, namely submission of the plan (as published) for an examination in public, as part of which there will be a consultation on proposed modifications. The report ends by discussing monitoring of plan implementation, and makes some suggestions with a view to effectively evaluating whether the plan delivers on policy priorities in practice.

1. Introduction

1.1. Background

- 1.1.1. AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Hertsmere Local Plan being prepared by Hertsmere Borough Council.
- 1.1.2. Once adopted, the plan will set a strategy for growth and change up to 2043, allocate sites to deliver the strategy and establish policies to guide planning applications.
- 1.1.3. SA is a required process for considering and communicating the effects of a plan, and alternatives, with a view to minimising adverse effects and maximising the positives.³
- 1.1.4. Finally, as an initial point, it is important to be clear that the Local Plan / SA process is being undertaken under the 2024 version of the NPPF (not the recent 2026 version).

1.2. SA explained

- 1.2.1. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2. In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that appraises “the plan and reasonable alternatives”. The aim of the report is to inform consultation and then plan finalisation.
- 1.2.3. More specifically, the SA Report must answer the following **three questions**:⁴
 - What has Plan-making / SA involved **up to this point**?
 - including appraisal of ‘reasonable alternatives’
 - What are the SA findings **at this stage**?
 - i.e. in relation to the draft plan
 - What are **next steps**?

1.3. This SA Report

- 1.3.1. The final draft (‘proposed submission’) version of the Local Plan is currently published under Regulation 19 of the Local Planning Regulations (2012) and the Regulations set out that the SA Report should be published alongside. This SA Report supersedes the Interim SA Report published as part of a Regulation 18 consultation in early 2026.
- 1.3.2. The aim of this report is to inform ‘representations’ on the Proposed Submission Local Plan and then plan finalisation (see discussion of ‘next steps’).

Structure of this report

- 1.3.3. This report is structured so as to answer each of the **three questions** introduced above in turn. Specifically, the questions are answered across three ‘parts’ of the report.
- 1.3.4. Before answering the first question there is a need to further set the scene by discussing the scope of the plan (Section 2) and the scope of the SA (Section 3).

³ The Planning and Compulsory Purchase Act 2004 sets out that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2024), and the Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published alongside the ‘Proposed Submission’ Local Plan (Regulation 19). The Government is now reforming required process, but this does not apply to the Hertsmere Local Plan provided it is prepared in a prescribed transitional window.

⁴ See **Appendix I** for further explanation of the regulatory basis for presenting certain information within the SA Report.

2. The plan scope

2.1. Introduction

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

2.2. Context to plan preparation

- 2.2.1. The current Local Plan dates from 2013 and looks ahead only to 2027, whilst the NPPF expects local plans to be reviewed every five years and look ahead 15 years, including in terms of identifying a supply of land sufficient to meet development needs.
- 2.2.2. On this basis alone it is clear that there is an urgent need to adopt a new Local Plan, but plan-making has proved challenging. Three early consultations under Regulation 18 were held in 2016, 2017 and 2018, before draft plans were consulted on under Regulation 18 in 2021, 2024 and then early 2026. The plan has now reached the 'Regulation 19 publication' stage ahead of submission in late 2026 and then adoption in 2028. The Government has set a deadline of submission by December 2026, which if missed would require the plan-making process to restart under new Regulations.
- 2.2.3. Identifying a 'supply' of land to meet development needs over the course of the plan period, as far as is consistent with sustainable development, is at the heart of preparing any local plan. Focusing on housing, local housing need (LHN) for the Borough now stands at 975 dwellings per annum (dpa) as understood from the government's standard method for calculating LHN. This is a 25% increase on the figure that applied when preparing the previous draft plan in 2024, and more than five times recent rates of housing delivery (189 dpa over 2022/23-2024/25). Also, it can be noted that standard method LHN is now much higher across the wider sub-region and in London. There is also a need to account for 'unmet need' within the sub-region, including from London.
- 2.2.4. LHN as understood from the government's standard method now applies as the housing requirement for the plan area, because the adopted Local Plan is out-of-date. For context, the housing requirement is the number of homes that any local authority is committed to delivering, where failure to deliver means that there is 'evidenced unmet need' such that there risks being a 'tilted balance' in favour of development. The Borough has long been unable to deliver its housing requirement such that there has been a 'tilted balance' and it has been difficult for the Council to defend against planning applications. Specifically, if an application is refused the risk is that it will then be granted at appeal under the tilted balance ('planning by appeal') and it is important to note that fighting appeals is resource intensive and potentially costly. Numerous major planning applications have been decided in this way, and this continues unabated.⁵
- 2.2.5. The implication is a need to boost supply and the best way to do this is via a Local Plan, as opposed to via ad hoc piecemeal planning applications. Also, through the new Local Plan there is also an opportunity to consider whether the housing requirement might be set at a level below LHN. However, there is a high evidential bar that must be reached in order to justify a housing requirement below LHN, particularly where there is existing unmet need in the sub-region (as is the case), and also particularly where the resulting 'unmet need' would not be provided for elsewhere, as is likely the case for Hertsmere.

⁵ Planning applications are now determined under the new NPPF (2026), which sets out key rules to guide planning applications under Policy S3 (Presumption in favour of sustainable development) and subsidiary policies S4 and S5. Firstly, Policy S4 sets out that there is now a 'permanent presumption' within settlements. Policy S5 then deals with 'the presumption' outside of settlements, but para 5 of the policy states that it does not apply within the Green Belt, which is key for Hertsmere. Within the Green Belt there is a need to consider Policy GB7, and the key point to note is that development in the Green Belt is "inappropriate" unless there is an **evidenced unmet need**, which specifically means that a local authority cannot demonstrate a 'five year housing land supply' (5YHLS), as measured against the housing requirement, or scores below 75% on the annual the Housing Delivery Test (HDT). In short, the HDT evaluates performance against the requirement looking back, whilst the 5YHLS test evaluates performance looking forward. Also, it is important to note that the 5YHLS test actually involves demonstrating a supply of deliverable sites amounting to the housing requirement plus either 5% or 20% (dependent on HDT performance).

- 2.2.6. The above discussion introduces the ‘sticks’ that are in place to encourage adoption of a new Local Plan. However, it is also important to state that there are many ‘carrots’:
- Firstly, meeting housing needs is not only of great importance in-and-of itself, but also important given wide-ranging secondary benefits, for example in terms of the health and well-being of communities and supporting the local and national economy.
 - Secondly, plan-led housing growth creates an opportunity to strategically target investment and policy ‘asks’ of developers (in the context of development viability parameters), thereby maximising the benefits of growth and potentially delivering ‘planning gain’ for existing communities, the environment and the local economy. Growth-related opportunities are easily missed without an up-to-date local plan.
- 2.2.7. Finally, it is important to be clear that the plan area does not stand alone but rather functions as part of a wider sub-region. The matter of factoring-in unmet housing need has already been introduced, but there are also many other sub-regional considerations.

2.3. The plan area

- 2.3.1. Hertsmere Borough is located at the southern extent of Hertfordshire, bordering the London Boroughs of Harrow, Barnet and Enfield to the south. Hertsmere is also bordered by four Hertfordshire local authorities (Three Rivers, Watford, St. Albans and Welwyn Hatfield) and these five authorities, together with Dacorum Borough, are understood to function cohesively as a South West Hertfordshire grouping.
- 2.3.2. Introducing the settlements in the Borough:
- Borehamwood – is the primary town, located in the south the Borough close to edge of the London suburbs to the south. It has comfortably the largest population of any of the Borough’s settlements and also comfortably the best services/facilities offer.
 - Potters Bar – is located in the east of the Borough in a more rural location. It is a substantial town, but the local offer is significantly lower than that of Borehamwood.
 - Bushey – is located in the far south west of the Borough, in close proximity to Watford and the London suburbs, and is in distinct parts which creates a challenge in terms of comparing its population and a services/facilities offer to Potters Bar.
 - Radlett – is the final town and is distinct from Bushey in that it is smaller, has a significantly lower services/facilities offer and is a more rural town.
 - Villages – the three primary villages are Shenley, Elstree Village and South Mimms. Shenley is the largest village, but all three have a primary school.
- 2.3.3. The Borough is located at the inner edge of the London Green Belt, and, in turn, a defining feature is the transition from the London suburbs to Hertfordshire as a county of distinct settlements separated by open countryside. As such, avoiding the sprawl of London into Hertfordshire is an important objective, as is maintaining countryside gaps between settlements. The Hertsmere Green Belt Assessment (GBA, 2026) identifies that a high proportion of the Borough is ‘grey belt’ or ‘provisional grey belt’, but this is on the basis of looking at small parcels of land strictly in isolation. The GBA also explains that, taking a step back, there are broad swathes of land within the Borough where maintaining openness is of strategic importance and where there is a risk of piecemeal developments in combination and over time ‘fundamentally undermining’ the Green Belt.
- 2.3.4. This matter of fundamentally undermining the Green Belt is important in light of NPPF paragraph 146, which states that where there are exceptional circumstances to warrant the release of Green Belt through a Local Plan (which is the case for Hertsmere):
- “... authorities should review Green Belt boundaries... and propose alterations to meet [housing] needs in full, unless the review provides clear evidence that doing so would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan.”*

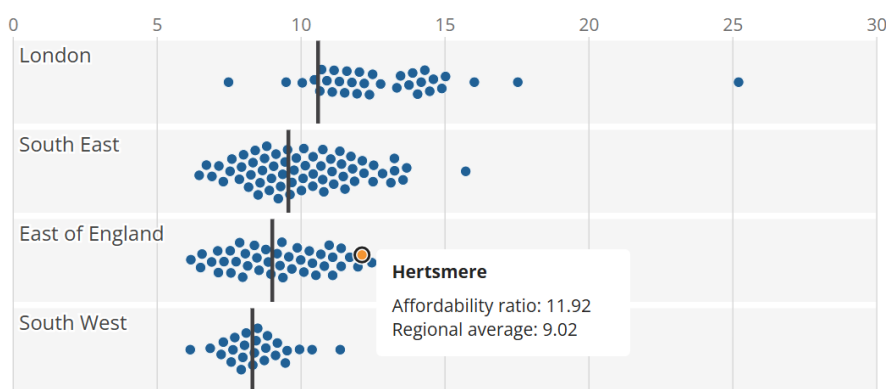
- 2.3.5. Aside from these Green Belt sensitivities, there are relatively few ‘headline’ constraints to growth locally, where a headline constraint is one that potentially factors into arguments for setting a housing requirement below LHN (see Section 2.2).
- 2.3.6. Taking the headline constraints listed at footnote 7 of the NPPF in turn:⁶
- Biodiversity designations – there are no internationally designated sites in the Borough and there is only one nationally designated Site of Special Scientific Interest (SSSI), namely Redwell Wood SSSI at the north east extent of the Borough, which is in proximity to an area that has been considered as a potential location for a new settlement over recent years (Bowmans Cross; discussed further below). Also there are two SSSIs in close proximity to the north west (Bricket Wood Common) and to the south (Harrow Weald). Also, Northaw Great Wood SSSI within Welwyn Hatfield Borough is potentially a constraint to growth north / north east of Potters Bar.
 - Flood Risk – the Borough drains to the River Colne, which is a major tributary of the Thames that passes through the north west of the Borough, flowing south from London Colney to Watford and then onwards to Rickmansworth (which is the start of the Colne Valley Regional Park). There are two main tributaries of the Colne and a number of sub-tributaries. Overall the effect of fluvial (river) flood risk as a constraint to growth is relatively limited across the Borough, in that it is difficult to envisage pressure to direct growth to areas at risk of flooding. However, downstream flood risk is a consideration, including noting areas currently at risk of flooding within Watford, plus surface water flood risk is extensive in some parts of the Borough, notably within Borehamwood.
 - Historic environment designations – are widespread but overall the Borough does not stand-out as subject to high constraint in the sub-regional context. Understanding of the varying significance of assets and their spatial distribution across the Borough is a key consideration for spatial strategy / site selection, but it is difficult to envisage historic environment constraints having a strong bearing on any arguments that might be made for a housing requirement set below LHN. Borehamwood, Potters Bar and Radlett are subject to notably low constraint, given largely 19th/20th century origins.
 - Irreplaceable habitats – ancient woodland is the primary consideration, and, in this regard, the Borough is subject to notably low constraint in the sub-regional context.
 - Landscape designations – there are no designated landscapes within the Borough, nor are there any broad areas established as being of larger-than-local significance. The Landscape Sensitivity Study (2020) does identify some ‘assessment units’ as having ‘high’ sensitivity, but these are mostly quite small discrete areas. This suggests limited potential for landscape constraint to factor-in as part of any argument for a housing requirement set below LHN. However, on the other hand, there are extensive parts of the Borough with ‘medium-high’ landscape sensitivity, and this constraint must be considered in the context of the Green Belt sensitivities discussed above.⁷
- 2.3.7. Having introduced Green Belt sensitivities and environmental constraints to growth, the next matter for consideration relates to infrastructure challenges and opportunities.
- 2.3.8. Beginning with transport infrastructure, a defining characteristic of the Borough is very good connectivity by road and rail, with three railway lines linking the key settlements into London and numerous junctions onto the strategic road network. Also, some parts of the Borough are associated with good opportunity to cycle to key destinations, such as strategic employment areas or Watford town centre. Whilst growth generates a range of concerns regarding transport infrastructure capacity there are also growth-related opportunities to be realised and, overall, it is very difficult to envisage transport factoring-in strongly as part of an argument for a housing requirement set below LHN.

⁶ A final headline constraint listed at NPPF footnote 7 is Local Green Space (LGS), but by its very nature this is a constraint that will rarely if ever factor into arguments that might be made for setting a housing requirement below LHN.

⁷ The Landscape Sensitivity Study considers sensitivity to specific types of development, with a key consideration here being its conclusions in respect of sensitivity to residential development.

- 2.3.9. Community infrastructure capacity is then a key challenge for the Local Plan. There is little if any precedent for arguing that community infrastructure constraints serve justify a housing requirement set below LHN, but it is clear that challenges locally are significant. Also, because the Borough has been and continues to see ‘speculative’ planning permissions granted under the ‘tilted balance’ (as discussed), a high level concern is worsening pressure on community infrastructure. Secondary school capacity is understood to be a key issue and, whilst growth could ‘unlock’ a new school, there are limited options, and any new school would take time to deliver. Also, whilst regeneration of the two main town centres to boost their roles as community hubs is a key priority, this again will take time. Overall, the risk is that housing growth dispersed across smaller sites leads to ever-increasing pressure on community infrastructure, although a Community Infrastructure Levy is in place to pool funds to deliver strategic projects.
- 2.3.10. Having discussed potential constraints to growth (Green Belt, environmental constraints and infrastructure challenges), the final task here is to introduce key aspects of the socio-economic baseline and give initial consideration to local plan implications.
- 2.3.11. Beginning with housing affordability, Figure 2.1 is taken from the website of the Office for National Statistics (ONS) and shows that the ratio of median house prices to median workplace earning is 11.9 (having risen from 5 in 1997 and peaked at 15.5 in 2021). Hertsmere’s ratio is lower than for some neighbouring areas but is nonetheless high. Radlett has a particularly high affordability ratio of 22.2 partly reflecting an average house price of £1,124,934 (£1,715,712 for detached houses).

Figure 2.1: Hertsmere’s affordability ratio in context



- 2.3.12. There is also a high need for affordable housing (i.e. housing for those whose needs are not met by the market), with the Local Housing Needs Assessment (LHNA, 2026) finding there to be a need for between 589 and 779 affordable homes per annum (of which a high proportion should be homes for social rent), which compares to delivery averaging under 50 homes p.a. over the past 10 years. Assuming a housing requirement set at LHN (975 dpa) then there is no potential to provide for affordable housing needs in full, given that viability limits the rate at which market led schemes can deliver affordable housing at between from 0% to ~50% depending on site-specific viability.
- 2.3.13. A high affordability ratio combined with a high need for affordable housing suggests a strong case for not seeking a housing requirement set below LHN.
- 2.3.14. Also, there are wider arguments for housing growth from a perspective of wishing to deliver on social objectives locally. The matter of delivering targeted new or upgraded community infrastructure has already been discussed above (and strategic green/blue infrastructure is a further consideration), but further key considerations include:
- **Relative deprivation** – Hertsmere is less deprived than 72% of local authorities nationally according to the Index of Multiple Deprivation 2025, but there are pockets of relative deprivation including one area in Borehamwood that is amongst the 10% most deprived nationally. There are also areas of deprivation in Watford and South Oxhey. Targeted growth can help to address issues of relative deprivation by bringing with it targeted investment, including in infrastructure, as well as new job opportunities.

- Town centre regeneration – is a key objective for the Local Plan, both in terms of providing for housing needs and in terms of place-making, the local economy and ensuring functioning town centres at the heart of communities. There are many town centre sites evidently with a dated built form in need of considerable investment and potentially redevelopment, which can bring with it wide-ranging targeted benefits, particularly when investment / redevelopment is coordinated across sites. Town centre regeneration is a corporate priority of the Council, e.g. as discussed [here](#), and with a [Hertsmere Visions](#) consultation recently having been completed. However, high reliance on complex regeneration schemes for housing supply leads to delivery risk.
- An inclusive community – the Borough has a distinctly ageing local population (discussed below), and so new homes can help with a balanced population profile. Also, sites can be required to deliver specialist housing, including for older people, and a further key consideration locally is delivering Gypsy and Traveller pitches. A Local Plan can also set requirements in respect of housing types and tenures, e.g. family housing (33.5% of Borehamwood households, and 31.1% of Bushey households reside in flats; in contrast, 51% of households in Radlett reside in detached homes). It can be noted that child poverty is an issue locally, with around 10% of children living in relative poverty, rising to around 20% if housing costs are factored-in (although rates of child poverty are lower than the average for the East of England). Local Plan growth can also help with ensuring healthy communities, noting that, for example, in 2025/26 32% of years six pupils were classed as overweight.

2.3.15. Finally, key evidence comes from the Hertsmere Economic Study (2026):

- Hertsmere's employment land supply is characterised by a small number of high-performing, modern sites (notably Centennial Park, Elstree Way, and Stirling Way), alongside a range of older, less competitive locations. The Borough faces challenges from limited vacant land, Green Belt constraint, and older premises, such that strategic planning and targeted interventions are essential to support the local economy.
- There has been recent major growth locally in the professional, scientific and technical sectors, with activities increasing by 80% over the past decade, which serves to highlight Hertsmere's status as a hub for knowledge-intensive industries.
- The creative sector, especially film and TV, is a key strength, and the sector's true impact is likely under-represented in official data. The Borough is also poised for growth in data centres, e.g. [DC01UK](#), and there is potential for tech-media synergy.
- The Study explores three economic growth scenarios before recommending one that accounts for 'labour demand' alongside an uplift film industry and data centre growth. It provides *"a realistic, evidence-led estimate of future requirements, balancing economic growth forecasts with local sectoral strengths and market dynamics."*
- This translates as a requirement for 24.7 ha of new employment land by 2041, specifically: 1.3 ha for offices; 3.2 ha for industrial uses; 10.2 ha for the film sector; and up to 10 ha for data centres. Existing commitments can provide for this requirement, with a number of key sites recently having been permitted ahead of the Local Plan.
- Hertsmere's population grew by 7.8% between 2011 and 2021 (in line with the sub-region and slightly below the average for the East of England (8.3%)) and, as part of this, the working-age population (16–64) increased by 5.6%, outpacing comparator geographies. However, projections to 2041 suggest a mere 0.5% overall population increase, with a striking 41.4% rise in the 65+ cohort and an 8.6% decline in the working-age group. This demographic shift signals a future challenge: an ageing population and a shrinking labour pool, which could constrain economic growth and reduce the borough's attractiveness for investment and innovation. Also, there are likely to be implications for commuting patterns and, in turn, road traffic.

2.4. The plan period

- 2.4.1. The plan period is 2026/27 to 2042/43 in line with paragraph 22 of the NPPF (2024): *“Local plans] should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities...”*
- 2.4.2. With regards to the proposed ‘base date’ of 1st April 2026, it is seen as standard practice to set a base date as close as possible to the point of plan adoption, even where recent housing delivery has been significantly below standard method LHN (see discussion in Section 2.2), because the standard method is adjusted annually to account for changes to the affordability ratio such that it captures past under delivery. Monitoring data is available for the 2025/26 monitoring year showing the number of homes built at all sites with planning permission, and so the plan period can begin on 1st April 2026.
- 2.4.3. With regards to the proposed plan-period end date of 31st March 2043, this will ensure a 15 year plan period from adoption assuming that the Local Plan is adopted in 2028. There is little case for a longer plan period given the context of Devolution and likely Local Government Review (LGR), i.e. given that the next Local Plan will likely be prepared by a Unitary Authority that includes Hertsmere, which will likely be informed by a Spatial Development Strategy (SDS) for Hertfordshire, and that this plan will be well placed to identify infrastructure-led strategic growth locations to provide for longer term needs.
- 2.4.4. Indeed, there is a case to suggest that forthcoming LGR serves as a reason for plans currently in preparation seeking to provide for needs over a period of less than 15 years, with this being the approach currently proposed by Welwyn Hatfield in their emerging Local Plan.⁸ Also, it is noted that the new NPPF (2026) requires 10 year plan periods moving forward, presumably given the context of devolution / SDSs (but, to be clear, the Hertsmere Local Plan is being prepared under the 2024 NPPF).

Existing commitments

- 2.4.5. As of 1st April 2026 (the start of the plan period) there are 2,148 homes set to come forward at sites that are already ‘committed’ on the basis of having planning permission or a resolution to grant permission. Also, 658 homes supply can be assumed from windfall sites, i.e. non-allocated sites that come forward in line with local plan policy.
- 2.4.6. Plan period LHN is 975 dpa x 17 years = 16,575 homes. As such, if the decision is taken to set the housing requirement at LHN (see discussion above and further discussion below), a key aim of the local plan is to identify a supply of sites (also potentially broad locations; NPPF para 72) for 16,575 – 2,148 – 658 = 13,769 homes.⁹

2.5. Plan objectives

- 2.5.1. Plan objectives guide the plan-making process. Also, through the SA process ‘reasonable alternatives’ must be defined in light of *“the objectives... of the plan.”*
- 2.5.2. The plan objectives are as follows (abridged):
- **Delivering a better future for Hertsmere** – where vibrant towns, green spaces and close-knit communities come together... investing in homes, businesses and community life to meet needs... a greener, fairer and more prosperous future - all while staying connected to the energy of the city and the heart of our community spirit...

⁸ The emerging Welwyn Hatfield Local Plan (2026) proposes a “ten year approach to allocations” meaning that, whilst it seeks to provide for the proposed housing requirement (LHN) in full over the first ten years of the plan period, very limited supply is identified for years 11 to 15 and, in turn, total plan period supply falls short of the plan period housing requirement. The plan explains: *“... it is appropriate for strategic growth beyond year ten of the plan period to be considered at the scale of the future unitary authority. This will enable long term development to be planned in a coordinated way, aligned with infrastructure delivery, environmental considerations and wider regional priorities.”* Also, Welwyn Hatfield justify this approach on the basis that the 2024 NPPF does not explicitly state that plan period supply must meet or exceed the plan period housing requirement.

⁹ It is recognised that the NPPF (2024) does not explicitly state that total plan period supply must meet or exceed the plan period housing requirement. However, it is considered to be standard practice for this to be the case. Also, for context it can be noted that the new NPPF (2026; N.B. the Local Plan is being prepared under the 2024 NPPF) states: *“Local plans should identify a sufficient supply and mix of sites to meet or exceed the housing requirement... for their areas over the plan period.”*

- **A thriving local economy** – strengthen Hertsmere’s role in the wider economy by expanding the local business base; particularly in relation to the Borough’s prominent role as a centre for the national and international film and television industry. Steer investment to town centres and other employment hubs and support the growth of sectors in which the Borough maintains or is poised to perform a key role... Enable the development of modern green industry... promote the greening of existing industries...
- **The regeneration of Borehamwood and Potters Bar** – ... transforms them as successful and sustainable places that sit at the heart of their respective communities. Ensure that the delivery of new homes, main town centres, employment opportunities, community infrastructure and public realm improvements are optimised...
- **Support a well-educated and skilled population** – ensure that businesses have the necessary support they need to grow; specifically, through the delivery of a range of activities and events including networking, training and skills development.
- **Meet the Borough’s housing needs by delivering homes for everyone** – ensure... access to a wide range and mix of high-quality housing, including genuinely affordable housing, which is tailored to meeting the varied needs of the community... all age groups and at different stages of life, families and those with specialist... requirements.
- **Delivering affordable homes** ... to meet identified need.
- **Securing a greener Borough** – ensure all people... benefit from access to high-quality green spaces by protecting, enhancing and connecting the Borough’s network of parks, open and water spaces. Promote and protect the ecological, biodiversity and amenity value of the Borough’s natural assets - including trees, green spaces and water spaces - and seek to enhance existing assets or make new provision through new development wherever opportunities arise. Address the decline in the number and distribution of species and deliver Biodiversity Net Gain across the Borough.
- **Responding to the climate emergency** – realise long-term reductions in energy use and carbon emissions in helping Hertsmere to reach its zero-carbon target by 2050. Increase the use of sustainable transport modes (including walking and cycling) and ensure that new development is designed to reduce car use, maximise energy efficiency, and integrate greening measures to limit the urban heat island effect.
- **Celebrating our local identity** – ensure that all new development responds positively to the special attributes of its local context – including the cultural, historic, built and natural environment. Secure and deliver new development that is designed, constructed and maintained to a high-quality standard. Make the optimal use of land and, where appropriate, facilitate the regeneration and renewal of localities within the Borough’s four main towns. Set a positive framework for conserving and enhancing the Borough’s historic environment that promotes its understanding and appreciation.
- **Healthy and safe communities** – create an environment that encourages and enables people to pursue active and healthy lifestyles irrespective of their age, ability or income, including by applying the Healthy Streets Approach, making provision for accessible leisure and recreation opportunities and protecting the amenity of residents and visitors, particularly from pollution. Promote cohesive and mixed communities along with walkable and liveable neighbourhoods by ensuring development is carefully integrated and designed to secure high-quality, legible and permeable spaces that are inclusive... Create safer neighbourhoods and improve perceptions of safety by ensuring the built environment comprises of welcoming spaces and places and that new development both designs out crime and improves resilience to emergencies.
- **Securing the timely delivery of infrastructure** – provide the essential physical, community and green infrastructure needed to support growth and sustainable places, by coordinating investment and securing the timely delivery of new infrastructure, including using Community Infrastructure Levy funding and planning contributions.

3. The SA scope

Introduction

- 3.1.1. The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).
- 3.1.2. The aim here is to introduce the reader to the *broad scope* of the SA, rather than trying to define the scope of the SA comprehensively, recognising that there is a need for flexibility to respond to the nature of the emerging plan and reasonable alternatives, and latest evidence. The SA scope is further discussed throughout this report, i.e. throughout the report there is discussion of key aspects of the sustainability context and baseline and key issues / opportunities and objectives. This allows for a targeted discussion, and avoids the need for a generic discussion of sustainability issues (etc.) that risks being poorly targeted in the context of the plan and reasonable alternatives.

The SA framework

- 3.1.3. At the heart of the SA scope is an appraisal 'framework' that aims to ensure that appraisal work is focused on the key issues / impacts and is suitably clear and concise.
- 3.1.4. An SA framework was established through consultation in 2017 and was subsequently used to guide appraisal work as reported in subsequent Interim SA Reports up to and including the Interim SA Report published alongside the Draft Local Plan in 2024.
- 3.1.5. At the heart of the SA framework from 2024 was a list of 15 sustainability topics, and in early 2026 it was considered appropriate refresh that list. Work to refresh the SA framework was explained in Section 3 of the Interim SA Report (2026), with the refreshed framework then used to guide the appraisal work set out later in the report.
- 3.1.6. At the core of the refreshed SA framework is the following list of sustainability topics:
- Air quality
 - Biodiversity
 - Climate change adaptation
 - Climate change mitigation
 - Communities 1: Education
 - Communities 2: Services
 - Communities 3: Health
 - Communities 4: Cohesion
 - Economy and employment
 - Historic environment
 - Homes
 - Landscape
 - Soils / resources
 - Transport
 - Water
- 3.1.7. The specific sustainability issues and objectives that are a focus of appraisal under each of these topics are discussed further within the appraisal sections of this report, beginning with Section 6 which present the appraisal of reasonable alternatives.

Part 1: Work to date

4. Introducing Part 1

4.1. Overview

- 4.1.1. Several formal consultations having been held to date. However, the aim here is not to relay the entire backstory, nor to provide an ‘audit trail’ of steps taken.
- 4.1.2. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2026 ahead of the current consultation. Specifically, the aim is to:
 - explain the reasons for selecting the alternatives dealt with – see **Section 5**
 - present an appraisal of the reasonable alternatives – see **Section 6**
 - explain the Council’s reasons for selecting the preferred option – see **Section 7**
- 4.1.3. This aligns with the requirement for the SA Report to present an appraisal of reasonable alternatives and “*an outline of the reasons for selecting the alternatives dealt with*”.

4.2. Reasonable alternatives in relation to what?

- 4.2.1. The requirement is to examine reasonable alternatives (RAs) taking account of “the objectives and geographical scope of the plan”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a **supply** of land, including by allocating **sites**, to provide for housing needs (**LHN**) alongside delivering on wider plan objectives. Establishing a spatial strategy is invariably a central objective of any local plan.
- 4.2.2. Alternatives in respect of spatial strategy / site selection / supply can be referred to as ‘**growth scenarios**’, and can also be thought of as **alternative key diagrams**. A focus on RA ‘growth scenarios’ ensures a focus on mutually exclusive alternatives that go to the very heart of the plan and, in turn, ensures a meaningful and engaging appraisal.¹⁰

What about broad spatial strategy?

- 4.2.3. Broad spatial strategy feeds into the definition of growth scenarios, and so is a focus of discussion in Section 5.2. However, at this stage in the process there is no requirement to appraise broad spatial strategy alternatives because there must be a focus on alternatives that are genuinely reasonable given supply options and the evidence base.

What about individual sites?

- 4.2.4. Individual sites invariably generate a high degree of interest, but they are not RAs where the objective of a local plan is to allocate a *package* of sites to deliver in combination. Nonetheless, consideration is naturally given to the merits of individual site options as part of the process of establishing growth scenarios – see Sections 5.3 and 5.4. There is also the matter of policy for individual sites, e.g. in terms of capacity and use mix.

What about DM policies?

- 4.2.5. The plan also covers development management (DM) policies, but it is clear that spatial strategy / site selection / supply is the central matter. DM policies are appraised in Part 2 and, as part of this, informal consideration is given to the question of alternatives; however, through discussion it was determined that there are no DM policy RAs.

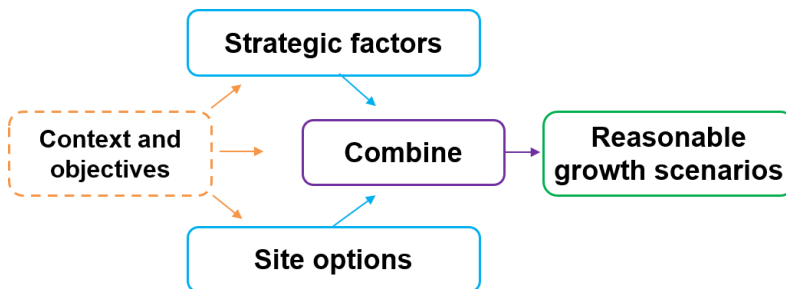
¹⁰ SA must only focus on significant effects, and a focus on RA growth scenarios guarantees a focus on meaningfully differential significant effects thereby negating a need to ‘screen’ all plan policy areas/issues/choices. A further consideration is that the Regulations, when read at face value, arguably require consideration of alternative plans (specifically, the requirement is to appraise and consult upon: “... *the plan and reasonable alternatives*”), which supports a focus on RA growth scenarios, i.e. alternatives that go to the very heart of the plan. Finally, in respect of RAs, it is important to note that appraising a draft proposal versus the ‘do nothing’ option does not equate to an appraisal of RAs, because ‘do nothing’ is the baseline.

5. Defining growth scenarios

5.1. Introduction

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

Figure 5.1: A standard broad process to define growth scenarios



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

- **Section 5.2** – considers strategic factors ('top down').
- **Section 5.3** – considers individual site options ('bottom up').
- **Section 5.4** – draws matters together (top down / bottom up).
- **Section 5.5** – concludes on reasonable growth scenarios.

- 5.1.3. With regards to the **context**, the first point to make is that key context is provided by plan-making stages over recent years, and a number of consultation response received are referenced/quoted below.

- 5.1.4. Secondly, numerous 'non-SA' workstreams have fed in as far as possible, but it is inevitably the case that there are challenges in terms of timings, including relating to key workstreams examining transport modelling, infrastructure requirements and associated costs, development / whole plan viability and site masterplanning. Also, there is a need to acknowledge that some of the key inputs to the local plan, including some of the aforementioned workstreams, focus on the emerging local plan only, which inevitably leads to a challenge in terms of evidencing alternatives / growth scenarios.

A note on limitations

- 5.1.5. It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the *definition* of reasonable alternatives. This amounts to a relatively early step in the plan-making process (a means to an end, i.e. alternatives for appraisal) which, in turn, has a bearing on the extent of work that is proportionate, also recalling the legal requirement, which is to present an "**outline of the reasons for selecting alternatives...**" [emphasis]

5.2. Strategic factors

Introduction

- 5.2.1. The aim of this section is to explore strategic factors (issues and options) with a bearing on the definition of growth scenarios. Specifically, this section of the report explores:
- Quantum – how much development is needed (regardless of capacity)?
 - Broad spatial strategy – broadly where is more/less suited to growth; also, what growth typologies are supported, e.g. large ('strategic') sites versus smaller sites?

Quantum

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

N.B. this section focuses on housing with **employment land** needs already having been set out in Section 2. A further consideration is providing for **Gypsy and Traveller accommodation needs**, with a recent needs assessment identifying a need for between 123 and 132 pitches (to 2045). This is a very significant need, and is discussed further within the appraisal sections of this report, beginning with Section 6.

Background

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

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

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

Local Housing Need (LHN)

- 5.2.6. As discussed, LHN for the Borough is 975 dpa on the basis of the Government's standard method, which accounts for: A) existing dwelling stock; and B) affordability. The figure was updated from 1,010 dpa in March 2026 in light of new affordability data.

Is it reasonable to explore a housing requirement below LHN?

- 5.2.7. The context NPPF paragraph 11, which states:
- "... strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits..." [emphasis added]*
- 5.2.8. There has always been the potential to evidence and ultimately justify a housing requirement set below LHN, and it can be noted that the proposal in 2024 was to set a housing requirement at around 75% of LHN (which at the time was 726 dpa).
- 5.2.9. However, it has always been understood that there is high evidential bar that must be reached in order to justify a housing requirement set below LHN ('no stone left unturned'), particularly where there is little or no chance of the 'unmet need' generated being provided for by a neighbouring authority, as is likely the case for Hertsmere.
- 5.2.10. The 2024 NPPF, which arguably 'raises the bar' that must be reached in order to evidence and ultimately justify LHN, but what it does not do is to make it "mandatory" that all Local Plan set a housing requirement at LHN or higher (which would be tantamount to banning unmet need, which is clearly not its intention, as it is unavoidably the case that there will always be some local plans that must generate unmet need).
- 5.2.11. It is paragraph 146 of the 2024 NPPF that is most consequential for Hertsmere given that Green Belt is a primary constraint (see discussion in Section 2). Specifically, paragraph 146 states that where there are exceptional circumstances to warrant the release of Green Belt through a Local Plan (which is the case for Hertsmere):

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

- 5.2.12. Having to demonstrate that the effect of growth will be to “fundamentally undermine” the Green Belt “across the plan area” clearly amounts to setting a high bar. However, this paragraph must be read in the context of the NPPF as a whole (as well as the PPG).
- 5.2.13. In this light, there remains at least the theoretical possibility of evidencing and ultimately justifying a housing requirement set below LHN, if it can be demonstrated that the adverse impacts of setting the housing requirement at LHN would significantly and demonstrably outweigh the benefits.
- 5.2.14. Also, a further consideration is that any local plan must only ever commit to a housing requirement that is deliverable, because failing to deliver means that there is an ‘evidenced unmet need’ with implications for being able to defend against speculative planning applications (as discussed in Section 2.2). In this regard, it is clear that there are concerns regarding delivering 975 dpa, which is more than five times recent delivery. It is recognised that an up-to-date local plan is an opportunity to support a step-change in delivery; also, it is recognised that there can be flexibility for a ‘stepped’ housing requirement whereby the housing requirement is lower in the early years of the plan and then commensurately higher in the latter years (to allow strategic sites time to deliver). However, uncertainties around infrastructure are unavoidable, and overall there is a high level delivery concern that must factor in when deciding the housing requirement.
- 5.2.15. To end, the following bullet points review a selection of recent adopted and emerging local plans that generate, or are considering generating, unmet housing need:
- Three Rivers – the Secretary of State recent intervened to require that additional allocations are added to the Local Plan in order to boost supply and, in turn, the housing requirement. However, the effect of the supply boost is to allow the housing requirement to be set at around 77% of LHN, i.e. such that there is unmet need.
 - Torbay – the Secretary of State recent intervened to require that information be submitted to demonstrate the evidence-based justification for a housing requirement set at 42% of LHN. However, the plan subsequently progressed to publication.
 - Hastings – following publication of a Draft Local Plan in early 2026 the Secretary of State wrote to the Council stating a concern with the proposal to set the housing requirement at less than 27% of LHN and requiring further work to demonstrate no stone left unturned. The Minister explained that, if further work confirms a need to generate unmet need then the Council should work with neighbours to try and make provision for that unmet need and, after having done so, if it remains the case that there is unmet need then this will need to be robustly justified. The latest proposal (agreed by Cabinet in September) sees a housing requirement set at 24% of LHN.
 - Mole Valley – the Inspector’s Report (2024) found a housing requirement set at 82% LHN to be sound, explaining:
 - *“... the Council sought to balance the LHN against... constraints.”*
 - *“[The requirement] is based on a thorough and robust assessment [of options].”*
 - *“[It] would be ambitious, almost doubling the target in the existing Plan.”*
 - London – the adopted London Plan (2021) generated unmet need that has not been provided for, and now a Draft London Plan has been published (July 2026) that generates major unmet need, with supply over the first ten years falling ~300,000 homes below LHN and then no specific supply identified for the subsequent ten years.
- 5.2.16. In **conclusion**, other than in delivery terms, it is difficult to suggest a *high level* case for exploring ‘below LHN’ growth scenarios, notwithstanding this having been the proposed approach in 2024 (when LHN was lower). However, a final decision can only be made after having also factored-in broad spatial strategy and detailed supply options.

Is it reasonable to explore a housing requirement above LHN?

5.2.17. In short, the answer is “yes” in light of NPPF para 67 which states:

“The requirement may be higher than the identified housing need if, for example, it includes provision for neighbouring areas, or reflects growth ambitions linked to economic development or infrastructure investment.”

5.2.18. Specifically, whilst there is no case for exploring growth scenarios involving a housing requirement set above LHN on the basis of “growth ambitions” there is a clear case on the basis of existing or potential unmet housing need within the sub-region, notably:

- Three Rivers – as discussed it appears likely that the emerging Local Plan will generate unmet need, although potentially quite a modest amount.
- Welwyn Hatfield – as discussed, the recent Draft Local Plan arguably generates unmet need, but the Council would argue that it does not (including because any shortfall in supply will be provided for in due course by a new local plan following LGR).
- Dacorum – the submitted Local Plan arguably generates unmet need (page 44 of the SA Report) but the latest situation is that the plan will likely not generate unmet need.
- St Albans – the recently adopted Local Plan provides for housing in full over the plan period but on the basis of a heavily stepped requirement, such that the housing requirement is set below LHN over the early years of the plan period. The Council has now commenced a new Local Plan that will set out to provide for an LHN figure of 1,643 dpa, which compares to a requirement for 380 dpa in the adopted Local Plan to 2031 and then 1,210 dpa from 2036. In summary, it is clear that providing for the new higher LHN figure will be challenging, but there is no clear risk of unmet need.
- Watford and Broxbourne – adopted their current plans in 2022 and 2020 respectively and both plans set a plan period housing requirement at LHN as it stood at the time. Both are quite heavily urbanised local authorities which suggests a risk of unmet need moving forward, although this is uncertain as both authorities are yet to make progress with a new local plan. The Broxbourne Local Plan notably sets a housing requirement at 454 dpa whilst standard method LHN is now 771 dpa. Watford appears to be delivering well against its requirement, scoring 95% on the housing delivery test (HDT).
- London – as discussed the new London Plan is set to generate major unmet need although there have been no formal requests made to surrounding local authorities in respect of potentially making provision for an element of this unmet need.

5.2.19. Having discussed unmet need, the other key argument to be made for a housing requirement set above LHN relates to affordable housing need, in light of the PPG explaining that a housing requirement set above LHN “*may need to be considered where it could help deliver the required number of affordable homes*”. As discussed in Section 2, under a scenario whereby the housing requirement is set at LHN only a modest proportion of affordable housing needs will be provided for, hence there is an ‘affordable housing’ case to be made for a housing requirement set above LHN.¹¹

5.2.20. In **conclusion**, there is a *high level* case for exploring ‘above LHN’ growth scenarios. However, a final decision can only be made after having also factored-in broad spatial strategy and supply options (below).

Conclusion on growth quanta

5.2.21. This section has introduced LHN and *high-level* arguments for a housing requirement set either above or below LHN. There are arguments to be made either way, such that a pragmatic response may simply be to set the housing requirement *at* LHN. This is often the case for the Local Plans and helps with expediting the plan-making process. Finally, it is important to note that whatever requirement is set there may be a need for a supply that is higher (‘headroom’), at least in the early years of the plan period.

¹¹ This assumes a continuation of the current situation whereby virtually all affordable housing is delivered by market led schemes and at a rate of 0 to 50% depending on site-specific viability considerations.

Broad spatial strategy

- 5.2.22. This is the second of two sections exploring top down strategic factors with a bearing on defining RA growth scenarios. Specifically, this section is an opportunity to discuss 'broad strategy' issues and options largely unincumbered by knowledge of site options.
- 5.2.23. Whilst it can be appropriate to undertake detailed work to explore broad spatial strategy issues and options, in the Hertsmere context, and at the current stage of a plan-making process that stretches back to 2017, detailed work of this nature is not called for.
- 5.2.24. Formal work to explore five broad spatial strategy options was undertaken in 2017/18 (and then the Draft Plan consultations in 2021 and 2023 also provided an opportunity for stakeholders to comment on broad spatial strategy). However, at this stage it is clear that the scale of the task in terms of providing for LHN (and recalling limited strategic case to be made for a housing requirement set below LHN, as discussed) is such that:
- There is a need to deliver considerable growth at the four **higher order settlements**, both through urban intensification and urban expansion. Focusing on the latter, there is a need for a balance between strategic sites well suited to delivering infrastructure alongside new homes and smaller sites with strong delivery and viability credentials.
 - A new settlement at **Bowmans Cross** (the only new settlement option) has been consulted on since 2017/18 and has been repeatedly supported for allocation through draft plan consultations (2021, 2024, 2026). Much detailed work has been completed, and a planning application has very recently been submitted (26/1330/OUTEI). There is a strong strategic case for allocation at this stage, including because the site is now thought to be capable of delivering 2,500 homes of its total 5,000 home capacity in the plan period, which is a major increase on the previous assumption of 500 homes. However, there do remain significant uncertainties regarding the timing of delivery.
 - There remains a question-mark regarding whether to allocate growth at the **villages** over-and-above the growth that is already set to come forward at sites with planning permission. In particular, attention focuses on the possibility of modest-sized allocations at one or more of these villages, with none being associated with a clear opportunity for transformative growth. On the one hand, the new strategic context in respect of housing needs suggests a need to consider modest allocations at villages, which will tend to benefit from strong viability and deliverability credentials. However, on the other hand, there is now a considerably stronger focus within the NPPF (2024) on taking a 'vision-led' approach to growth in transport terms, which can serve as an argument against village growth.¹² Finally, it can be noted that village allocations were previously proposed in both 2021 and 2024 (but not in 2026), but that was in a different context in that: A) sites have since gained permission; and B) there is now a move away from the 'dispersal' strategy that influenced the proposed approach in 2024.
- 5.2.25. Having made these introductory remarks, the remainder of this section presents a review of the spatial strategy discussion presented within the current plan consultation document. The aim is to highlight: A) aspects of the emerging strategy that are relatively firmly justified at this point in the process; and B) aspects that remain more open for debate such that they might be explored as a variable across the RA growth scenarios.

Proposed spatial strategy 1: Regeneration nodes

- 5.2.26. The discussion begins by introducing three urban regeneration nodes, specifically two within Borehamwood (the town centre and Elstree Way) and one in Potters Bar (the town centre). There is an established strategic opportunity to deliver a major step-change in housing supply from within both Borehamwood and Potters Bar, with detailed work having been completed since the Council announced this as a key priority for the new Local Plan in 2025, including with the leader of the Council stating:

¹² There are also several other smaller villages, but none are considered suited to a local plan allocation. These villages are washed over by the Green Belt, but small sites to meet local needs could come forward as windfall 'exception sites', plus the new national policy on grey belt increases the potential for windfall sites where "a sustainable location" can be demonstrated.

“We are proposing to meet the growth challenge through massive investment in our major town centres in Borehamwood and Potters Bar. This is a once-in-a-generation opportunity to drive prosperity, employment and investment in our borough. Work to set out the outline economic case is already well under way.”

- 5.2.27. A consultation was held in 2026 on emerging visions for both towns (see the summary exhibition boards here) has subsequently continued, including working closely with landowners to understand their views on redevelopment, including from a timing perspective. It is beyond the scope of this Local Plan SA process to explore alternative approaches to regeneration / intensification within either town; however, what is crucial is that a realistic understanding of delivery risks and viability challenges feeds into work to define the RA growth scenarios (see further discussion in Section 5.5).
- 5.2.28. This is crucial because: A) at the local plan stage it is difficult to foresee how complex urban sites will ultimately come forward for redevelopment, often many years down the line, including in terms of density (including but not limited to building heights) and use mix; B) viability challenges mean that urban sites often struggle to deliver the full policy quota of affordable housing and it is not unusual for such sites to deliver no affordable housing at all; and C) urban sites tend strongly to be associated with delivery risk including given complex land ownership and existing viable uses, and the Local Plan as a whole must not be adopted with undue delivery risk, particularly over the early years of the plan period, with a view to avoiding a situation whereby the Council fails to deliver on its housing requirement such that there is ‘evidenced unmet need’ (and, in turn, the Council struggles to defend against speculative planning applications, as discussed).
- 5.2.29. In this regard, the plan document explains that there are two key urban sites that have not been confirmed as available, but which can reasonably be included in the Local Plan supply as there is a reasonable prospect that they will become available over the coming years such that they can deliver homes late in the plan period. These two sites (HBA6 and HPBA6) are assumed to deliver 1,088 homes. Ultimately, whilst there is a need to acknowledge the delivery risk, it is considered reasonable to include these sites in the Local Plan so long as there is not reliance on early delivery (see NPPF para 72).¹³

Proposed spatial strategy 2: Growth nodes

- 5.2.30. In practice the growth nodes comprise urban extensions to the Borough’s four main settlements with a capacity of 50 or more homes.
- 5.2.31. With regards to smaller sites, a number are identified as suitable within the Housing and Economic Land Availability Assessment (HELAA), and supply from these sites is assumed in the plan period (772 homes in total), but the proposed approach is not to formally allocate these sites. 628 of the 772 homes assumed from these sites are located at one of the four top tier settlements, and then the remaining sites are located at: A) Rural west – 74 homes; B) South Mimms – 50 homes; Elstree – 13 homes; and Shenley – 7 homes. It is recognised that smaller sites at villages can warrant careful consideration, and so village site / growth options are discussed further in Section 5.4.
- 5.2.32. The plan document explains that growth nodes: *“... will deliver an appropriate and proportionate mix of uses including residential, main town centre, employment, open spaces, community infrastructure and transport... optimised to ensure that they deliver at least a rolling housing land supply over the course of the entire Local Plan period.”*
- 5.2.33. In light of this statement, key points to note include:
- Growth node options vary considerably in terms of the potential to deliver a mix of uses and also the potential to deliver new and upgraded infrastructure alongside new homes (infrastructure is discussed further below).

¹³ NPPF paragraph 72 has already been discussed above in the context of the emerging Welwyn Hatfield Local Plan. It states that whilst a key task for local plans is to identify ‘deliverable sites’ for the first 5 years of the plan period post adoption, for years 6 to 10 there is only a need to identify ‘sites or broad locations for growth’ and then for years 11 to 15 there is only a need to identify sites or broad locations for growth “where possible”.

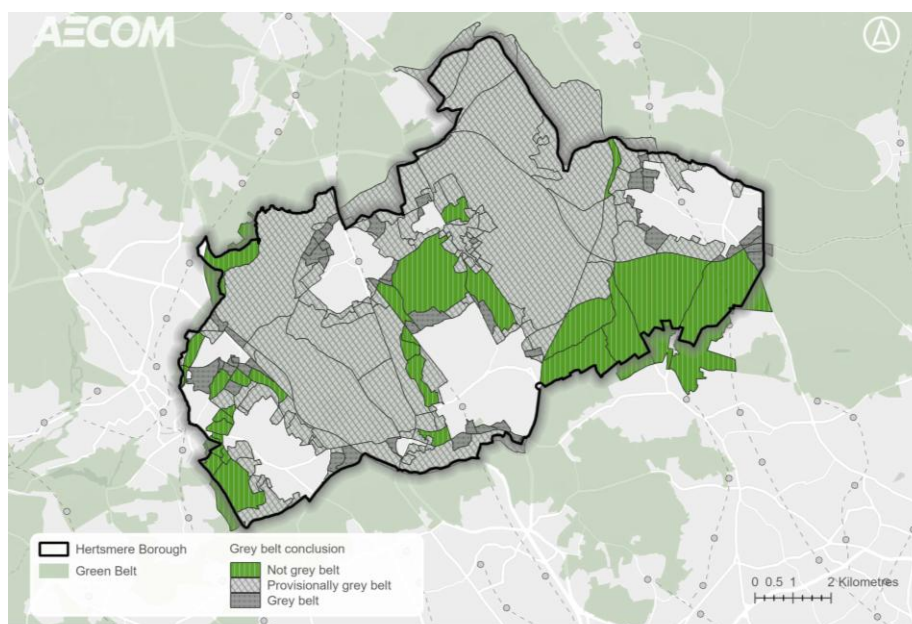
- The potential for ‘planning gain’ is closely correlated with scale, and it is also important to recognise that large sites with infrastructure dependencies take time to deliver and can be associated with delivery risk, whilst a key aim for the local plan is to establish a robust supply of sites with low delivery risk that can be relied upon for early supply.
- Growth nodes can impact in combination, both positively (e.g. in terms of infrastructure delivery) and negatively (e.g. in terms of infrastructure capacity). The potential for sites to impact in combination is a focus of further discussion below.
- 6 Green Belt sites with a capacity over 50 homes have planning permission, such that there is limited potential to influence delivery through the Local Plan. At one of these sites (Bushey Hall Golf Club, Bushey Hall Drive) there is planning permission for 350 homes but the site promoter now proposes 500 homes, as discussed further below.

5.2.34. The next matter discussed within the plan document is Green Belt, with the situation largely unchanged from the Regulation 18 stage, when the Interim SA Report explained:

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

5.2.35. However, there is new evidence in the form of a Stage 2 GBA (2026), which examines specific site options (as opposed to land parcels, as shown in Figure 5.2). The Stage 2 GBA identifies the great majority of site options as grey belt or provisional grey belt, but there is a notable cluster of sites to west of Borehamwood where the conclusion is that the sites are not grey belt (at least in isolation). These sites are discussed further below.

Figure 5.2: Identified grey belt and provisional grey belt from the Stage 1 GBA¹⁴



¹⁴ N.B. ‘provisional grey’ belt’ is the conclusion reached for parcels that are grey belt pending further detailed consideration of NPPF footnote 7 constraints (most notably historic environment and flood risk constraints). In practice, a considerable proportion of the identified provisional grey belt will be grey belt following detailed investigation, and it can also be noted that the new NPPF (2026) removes NPPF footnote 7 constraints as a factor with a bearing on the identification of grey belt, such that all of the provisional grey belt may now be grey belt in the context of deciding planning applications.

Proposed spatial strategy 3: Hertsmere's four main towns

5.2.36. The discussion of spatial strategy in the plan document explains:

- Regeneration and growth nodes in combination *“will secure a progressive intensification, and better use, of the Borough’s four main towns.”*
- A key aim is to *“facilitate and better balance growth as well as to redress the distribution of investment locally, ultimately, to make neighbourhoods more sustainable and ensure equality of opportunity across Hertsmere.”*
- With regards to urban sites (including regeneration nodes), the plan document explains that they are broadly well-placed to support growth, including because: *“New development can support town centre vitality particularly where larger schemes deliver public realm and townscape improvements. There are also opportunities to secure the long-term viability of town centres through the introduction of a wider range of uses including housing, workspace, cultural uses and community facilities... The Council considers it important that town centres complement and support but do not compete with one another. Therefore, the Local Plan seeks to build on their unique qualities, character and function. As these centres will be important focal points for sustainable growth and new development they are expected to evolve over time, responding to the challenges facing our high streets and becoming even more liveable, vibrant and vital.”*
- With regards to growth nodes, they are supported including because some sites: *“provide an opportunity to deliver meaningful mixed-use developments that include new centres that serve their surrounding communities.”*
- Overall, a priority is as follows: *“The delivery of the Regeneration and Growth Nodes will secure the Visions for the Borough’s four settlements. The Regeneration and Growth Nodes will be aided by the delivery of new and improved transport infrastructure, which will help to unlock the development potential of their constituent sites. This includes improvements to sustainable travel networks and services that will provide connections to the wider adjoining town and beyond.”*
- Finally, with regards to the villages and wider countryside, the plan document states: *“The settlements and places that lay beyond the Borough’s four main towns are inappropriate locations for directing the scale of growth envisaged by the Local Plan. Whilst some of these places, such as the large village of Shenley, have experienced recent growth, these have largely been unplanned and implemented in a piecemeal manner via planning appeals. These places remain distant, disconnected and poorly supported by facilities, services, infrastructure and amenities. Consequently, the Spatial Strategy considers these places unsustainable locations for meeting the Borough’s needs. The exception being proposals for single infill dwellings that deliver self or custom build housing and/or deliver affordable housing that meets specific local needs. These will be considered on their merits.”*

5.2.37. With regards to differentiating between the four main towns in terms of broad spatial strategy, the following points from the Interim SA Report (2026) still hold true:

- Borehamwood vs Potters Bar – Borehamwood is associated with a more readily apparent growth opportunity in terms of its local offer and connectivity, including close links to both London and Watford, but there are also opportunities for strategic expansion of Potters Bar, including with a view to comprehensive planning for land between the town and motorways. At both towns a number of important sites have recently gained planning permission, and others are the subject of live applications (under the presumption in favour of sustainable development), but at both towns there are key strategic choices to be made in respect of expansion through the Local Plan.
- Bushey vs Radlett – Bushey is arguably associated with the more readily apparent strategic growth opportunity, given its close links to Watford and London, and there is a case to be made for comprehensive large scale expansion in order to deliver a secondary school, new strategic transport links and wider infrastructure, and to secure a long term settlement in terms of Green Belt gaps. However, given the available site options it is not clear that this is a realistic option for the current Local Plan.

Radlett is a more rural settlement with a significantly lower local offer but does benefit from a clearly recognisable local centre (whilst Bushey has two smaller centres). Given the available site options, and wider factors discussed further below, a key consideration for the Local Plan is strategic expansion to the west and, as part of this: A) there is a need to consider secondary school capacity and the possibility of focused growth to deliver a new secondary school; and B) there is a need to avoid piecemeal expansion that risks being sub-optimal in terms of securing benefits, and risks sprawl.

Proposed spatial strategy 4: New Settlement

- 5.2.38. Bowmans Cross new settlement option has already been introduced above. The plan document introduces the new settlement option as follows:

“The potential for a new settlement located on land known as Bowmans Cross has been explored by successive plan-making processes. The opportunity lies to the east of the existing town of London Colney, which itself is in the neighbouring administrative area of St Albans City. The Bowmans Cross site has been used for a variety of minerals extraction and waste processing uses, all of which are now time expired. Whilst the site is not an inherently sustainable location, the scale of development provided by a new settlement, provides a genuine opportunity to investment in necessary supporting infrastructure that can make it a successful and sustainable place over the lifespan of its implementation. The new settlement will deliver a significant quantum of new homes; a new centre that comprises a full range of main town centre uses, inclusive of retail, community infrastructure and complementary employment uses; open spaces; education provision; and transport infrastructure and services. It is anticipated that the new settlement will begin to deliver an up-lift in housing supply during the second half of the plan period, which will be sustained into the following. The Council considers this an important aspect of the Spatial Strategy that demonstrates a strategic commitment to meeting the Borough’s, and the nation’s, development needs.”

- 5.2.39. Bowmans Cross new settlement option is discussed further in Section 5.4, where a final decision is made in respect of whether it can reasonably be held ‘constant’ across the RA growth scenarios at this stage or needs to be explored as a variable across the growth scenario, as per the approach taken within the Interim SA Report (2026).

Proposed spatial strategy 5: Deprivation and equality of opportunity

- 5.2.40. This has already been discussed as a key issue in support of an ambitious yet targeted approach to urban regeneration. The plan document states:

“The Hertsmere Visions considers it important that everyone can enjoy a good quality of life irrespective of their background, age or ability. Whilst there are many prosperous neighbourhoods... there are some localities where environmental, social and economic barriers adversely affect peoples’ lives. The Local Plan seeks to tackle deprivation by coordinating new investment within these areas. It also highlights for our stakeholders, and delivery partners the need for targeted interventions to address the specific causes of deprivation and inequality. This includes investment in the built and natural environment as well as programmes for education, training, health and social care.”

- 5.2.41. It is also important to add that greenfield growth options can give rise to an opportunity to deliver targeted benefits in support of objectives relating to tackling deprivation and ensuring equality of opportunity, for example in terms of employment opportunities, new community infrastructure and new accessible strategic green / blue infrastructure. However, growth can also give rise to tensions, for example in terms of community infrastructure capacity and traffic congestion, and a concern can be that supporting greenfield urban expansion serves to divert investment from urban regeneration.

Proposed spatial strategy 5: Timely delivery of infrastructure

- 5.2.42. The plan document explains that the Infrastructure Delivery Plan (IDP) is a key means of establishing the infrastructure requirements in support of growth, and how these requirements can be met via site-specific delivery, developer contributions and wider funding sources. The IDP is a challenging exercise, and infrastructure planning is a matter for ongoing consideration over the course of plan implementation, but the IDP represents a key opportunity to consider infrastructure the issues and opportunities associated with growth locations cumulatively, rather than piecemeal via applications.
- 5.2.43. Transport infrastructure is clearly of great importance, and the plan document states:
- “The Council will continue to work with the local transport authority and other key transport infrastructure partners to deliver improvements to the Borough’s sustainable and active travel networks. This aligns with successful and sustainable place-making objectives that seek to secure growth that is genuinely forward facing and positively considers car-lite use and ownerships into the future. Improvements promoted under the LCWIP, alongside investment in public transport will seek to secure improved connections between the Borough’s settlements and places.”*
- 5.2.44. Work on transport planning is ongoing at the time of writing, but the IDP sets out a range of targeted requirements and opportunities in respect of transport infrastructure, and it is important that these feed through into viability assessment and site specific policies.
- 5.2.45. Finally, it is important to highlight the need for close collaboration with Hertfordshire County Council (HCC). The Interim SA Report (2026) discussed the key issues raised by HCC at the prior Draft Plan consultation stage (2024) as relating to: identifying an appropriate secondary school site to serve the west of the district in a sustainable location;¹⁵ B) ensuring that the identified school site in Borehamwood is deliverable;¹⁶ C) setting out a borough wide transport strategy;¹⁷ and setting out site-specific transport measures to mitigate the highway impacts of the development at Bowmans Cross.
- 5.2.46. Also, the Interim SA Report explained: *“The shifting strategy over time has clearly created challenges for strategic infrastructure planning, such that what is needed now a need to provide certainty to partner organisations in respect of growth quantum and locations. Ongoing ‘speculative’ planning applications creates a clear challenge...”*
- 5.2.47. Through the consultation in early 2026 HCC then introduced their position as follows:
- “Through previous consultation and engagement... the county council and Hertsmere Borough Council signed a Statement of Common Ground (SoCG) acknowledging that further work is required prior to the Regulation 19 stage. This is in respect of plan-wide transport mitigations, transport work for the new settlement at Bowmans Cross (to ensure that appropriate mitigations are identified and capable of being delivered) and the identification and appropriate allocation of deliverable new secondary school sites. The issues identified within the Statement of Common Ground (SoCG) remain unresolved at this time and continue to require agreement. We anticipate that an updated SoCG will be prepared as the plan progresses towards examination...”*
- 5.2.48. It is clear that a secondary school to serve the west of the Borough is a key issue for the local plan, although the situation is constantly evolving, including given proposed / potential secondary schools in neighbouring areas, and also the potential to deliver a new secondary school at Bowmans Cross new settlement (discussed below).

¹⁵ The Interim SA Report also stated: *“This is a key issue including because there is now set to be much higher growth in both Hertsmere and Three Rivers relative to what was assumed by HCC in 2024. Importantly, Three Rivers now proposes a new secondary at Carpenders Park.”*

¹⁶ The Interim SA Report also stated: *“A potential site for a new secondary school at the southeast edge of Borehamwood (south of Barnet Lane, west of Stirling Corner) was identified in 2021, but by 2024 it was not clear that it was required given the proposed lower growth strategy. There is also a need to consider the possibility of a new secondary school at Bushey and/or Radlett, as discussed [here](#).”*

¹⁷ The Interim SA Report also stated: *“A Transport Study (2023) presented a range of key information regarding key issues and opportunities assuming a spatial strategy / quantum of growth in line with that previously consulted on in 2021, including with a major focus on connectivity by rail, bus and walking/cycling. This is a key source of evidence, and the study is discussed further below, in Section 5.4. A further Transport Study is now underway and a Draft LCWIP is now out for consultation.”*

- 5.2.49. Finally, the HCC consultation response received in early 2026 emphasises the need to account for the Hertfordshire Local Nature Recovery Strategy (LNRS), stating: *“Development proposals should support the delivery of its priorities by: a) Avoiding harm to areas identified as important for biodiversity; b) Contributing to habitat creation, restoration and enhancement in areas identified as opportunities for nature recovery; [and] c) Supporting the establishment of a coherent Nature Recovery Network.”*
- 5.2.50. The LNRS key outcomes map is available [here](#), and helpfully sets out key areas of importance for particular importance for biodiversity (APIBs). With regards to the network of areas that could become of importance for biodiversity (ACIB), this network is very extensive within the Borough, but there are some particular hotspot areas, including some areas in consideration for strategic urban extensions, as discussed further below.

Proposed spatial strategy 6: Making the best the use of land and space

- 5.2.51. The plan document explains that as well as ‘site selection’ there is also a key role for the Local Plan in terms of assigning capacity figures to each site, accounting for development densities and the required mix of uses and house types on site.
- 5.2.52. The plan states: *“The Spatial Strategy directs higher density and mixed-use development to well-connected locations and other areas where new investment will support regeneration. It is complemented by the Part 2 policies which set requirements to ensure that new development is designed to a high-quality standard and makes the optimal use of land...”* However, it is also important to recognise that higher density development can create viability challenges, at least at the current time (i.e. the situation may evolve over the course of the plan-making process). In particular, one issue at the current time is new regulations that require second staircases to be delivered as part of schemes that extend in height beyond circa 6 stories. Accounting for market factors when setting site capacities can help to ensure that sites deliver as anticipated and with viability headroom to fund affordable housing, infrastructure and wider policy asks.

Proposed spatial strategy 6: Celebrating Hertsmere / enhancing distinctiveness

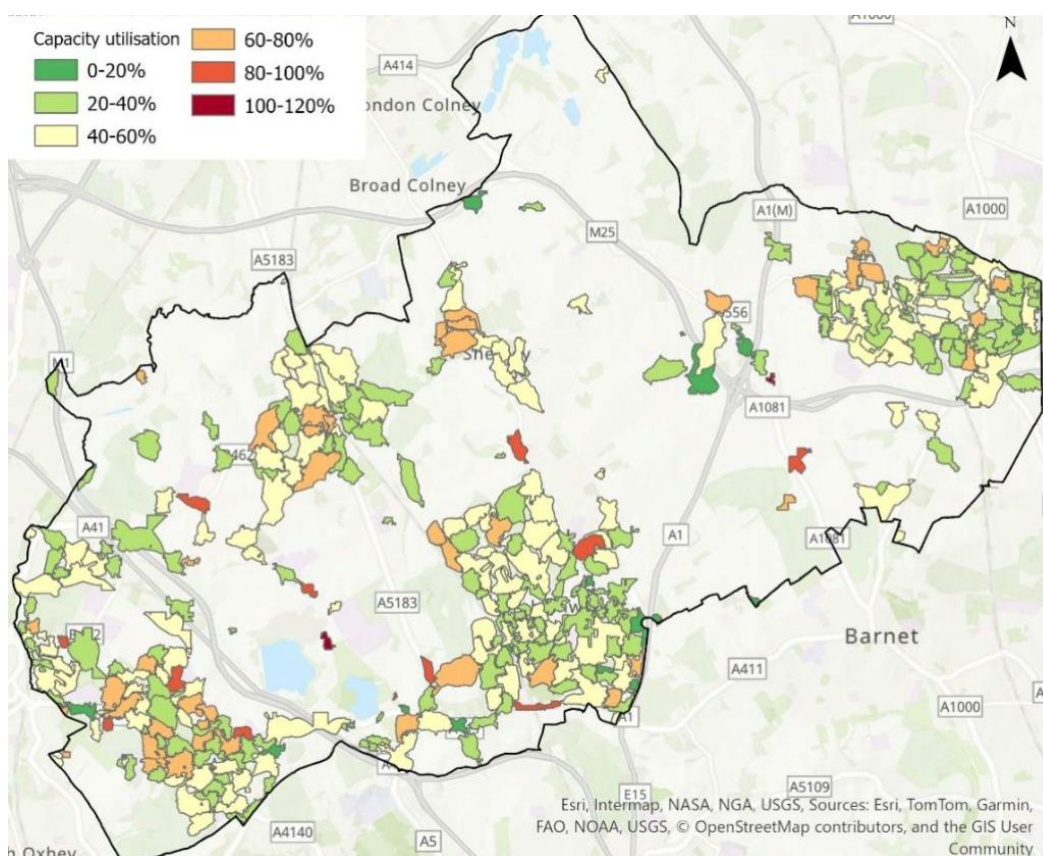
- 5.2.53. The plan document states: *“Hertsmere will continue to evolve in the wider context of Hertfordshire and as a key part of London’s hinterland. Respecting local character and accommodating growth should not be seen as mutually exclusive. New development must help to reinforce the special characteristics of the Borough... [and] assist in repairing and re-shaping those elements of the built environment that could make a more positive contribution to the visual quality and liveability of our neighbourhoods.”*
- 5.2.54. It goes on to further states: *“The open countryside that surrounds the Borough’s four main towns makes a significant contribution towards their character and appearance, particularly in respect of how they are perceived and experienced as distinctive places... The Spatial Strategy contributes towards this approach by ensuring that future growth is optimised and does not contribute to sprawl. This process is informed by an appropriate and proportionate technical evidence base...”*
- 5.2.55. With regards to evidence base, the two stages of GBA have already been discussed above, but it is also important to note here that a Landscape Impact Assessment (LIA) has also been completed which assesses a shortlist of site in contention for allocation. Settlement separation and the risk of sprawl (including the risk of London sprawling into Hertfordshire / loss of separation between London and Hertfordshire) is broadly an issue across the west of the Borough, including noting growth in neighbouring areas.

Proposed spatial strategy 6: A greener Borough

- 5.2.56. The plan document states: *“The Local Plan sets a framework for delivering successful and sustainable places with environmental considerations fully integrated into the planning and development process. It sets out our approach to protecting and enhancing the local network of green infrastructure, parks and open spaces and the water environment. As well, it provides the local land-use strategy for mitigating the Borough’s impact on global climate change, whilst ensuring neighbourhoods are made more resilient and well placed to adapt to the consequences of it.”*

- 5.2.57. Focusing on climate change adaptation / decarbonisation, a detailed suite of three evidence studies has recently been completed, and key messages to come out of these studies include: A) there is broadly support for urban intensification, although climate adaptation / resilience requires careful consideration; B) some site options are associated with onsite sensitivities relating to climate resilience, particularly in terms of flood risk and biodiversity, which require careful consideration as part of work to determine site capacities and site-specific policy; and C) the electricity grid / network is increasingly a key consideration for spatial strategy and site selection (given electrification of heat and travel, data centres and existing grid challenges) such that there is a need to minimise peak strains on the grid (including via battery storage) and particularly in areas known to be constrained (e.g. with constrained sub-stations).
- 5.2.58. Strategic scale sites can represent an opportunity to deliver on climate change mitigation and adaptation objectives, including because they allow for site-level masterplanning and innovative solutions in terms of design and infrastructure. However, it is also the case that sites with strong viability can represent an opportunity from a built environment decarbonisation perspective, which often means smaller greenfield sites.

Figure 5.3: Capacity at secondary sub-stations – a spatial strategy consideration



5.3. Site options

Introduction

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

HELAA

- 5.3.2. The Housing and Economic Land Availability Assessment (HELAA) is a prescribed process for identifying a shortlist of sites for potential allocation where each site is ‘available’, ‘achievable’ and ‘suitable’ (and therefore ‘deliverable’, where the site could deliver within five years, or ‘developable’ where it could deliver in the plan period).
- 5.3.3. A key point to note is that the total capacity of these sites exceeds the total supply that the Local Plan needs to provide for, assuming a housing requirement set at LHN. As such, there are significant choices to be made in respect of site selection. However, choice is limited at some settlements, given the site options and the strategic context.
- 5.3.4. Further considerations in respect of the HELAA are as follows:
- Availability and achievability – work to establish availability and achievability through the HELAA is high level and for some complex urban sites it may transpire that there is insufficient confidence that sites will deliver in the plan period, or that there is only confidence of delivery late in the plan period, or that they can be allocated but with an acknowledged delivery risk, which then must factor-in (discussed further below).
 - Suitability – work to reach a conclusion of ‘suitable’ through the HELAA is high level, and a key task for any local plan is to consider whether there are sites that are insufficiently suitable to warrant allocation given better performing sites that in combination will deliver on strategic objectives. Also, work through the HELAA strictly considers site options in isolation, whilst it is the role of a local plan to consider issues / impacts and opportunities associated with allocating sites in combination.
 - Planning permissions – numerous of the HELAA sites have planning permission, as explained further below in Section 5.4.
 - Live and forthcoming applications – a number of sites are the subject of a live planning application, sometimes with it being the case that permission has recently been refused and there is now a forthcoming appeal (or an appeal is likely). Also, for several sites it is known that a planning application is imminent, such that the site might be ‘decided’ ahead of the Local Plan (under ‘the presumption’).

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

- Previous draft allocations – it is an important consideration where sites were previously a draft allocation in 2021 and/or 2024, and sites that were shortlisted as a ‘candidate site’ at the Regulation 18 consultation stage earlier in 2026. Where a site has been repeatedly flagged as a potential allocation over successive consultation stages (including past consultation stages when LHN was lower), this is an indication that it is a strongly performing site, including given a strong evidence base developed through consultation. Where a site has been flagged as a potential allocation in the past but is now an ‘omission site’, this is an indication that it warrants ongoing consideration.

- 5.3.5. Work on the HELAA remains ongoing at the time of writing, but this is not a major issue for the task at hand. Specifically, the task for Section 5.4 is to: A) discuss all proposed allocations, as well as a shortlist of omission sites; B) decide which should be taken forward to the RA growth scenarios (with it clearly being the case that all proposed allocations need to be taken forward); and C) for each site decide whether it should be taken forward to the RA growth scenarios as a 'constant' or a 'variable'. Specifically, the fact that work on the HELAA is ongoing at the time of writing is not a major issue because there is a readily apparent shortlist of key omission sites for discussion.

Sites above and below 50 homes capacity

- 5.3.6. The focus of discussion below is on sites with a capacity of 50+ homes such that they are in contention for allocation. However, the HELAA also considers smaller sites, and identifies 38 such sites as deliverable or developable. Supply from all of these sites is assumed in the plan period (658 homes in total), and these sites are taken into account below, when considering the merits of allocation options and potential growth scenarios. Omission sites with a capacity of less than 50 homes are not considered further.
- 5.3.7. Sites with a capacity below 50 homes that are deliverable/developable in the HELAA and so form part of the plan period supply are referred to below as '**HELAA supply**'.

Non-housing site options

- 5.3.8. With regards to employment land, there are sites with planning permission sufficient to provide for needs, but employment site options are nonetheless discussed in Section 5.4. With regards to Gypsies and Traveller sites, there is not an established shortlist of site options for discussion in Section 5.4 (see further discussion in Section 5.5).

Conclusion on site options

- 5.3.9. This section has sought to introduce workstreams that have examined individual site options, including noting the distinction between sites with a capacity above and below 50 homes. Also, it has sought to introduce some key characteristics of site options, e.g. the question of whether a site has planning permission, is the subject of a live (or anticipated) planning application and/or has been flagged for allocation in the past.
- 5.3.10. Whilst it can sometimes be appropriate to undertake dedicated SA work to appraise individual site options (e.g. a shortlist of strategic sites), in practice it was determined that there was no reasonable need for work of this nature for the current purposes.

5.4. Combining top down and bottom up

Introduction

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

Methodology

- 5.4.5. For each settlement the aim is to draw together the ‘top down’ and ‘bottom up’ inputs discussed above before concluding on scenarios to take forward to Section 5.5, where the aim is to combine settlement scenarios to form borough-wide RA growth scenarios.
- 5.4.6. Site options are discussed in a broad order of preference with attention focusing on those sites where the question of allocation versus omission site is more marginal. In turn, the aim is *not* to focus discussion on proposed allocations where the case for allocation is relatively clear cut (e.g. because the site has planning permission), nor those omission sites where there is not considered to be a strong case for allocation.
- 5.4.7. It is important to note that the aim is not to present a formal appraisal, but rather to contribute to “an outline of the reasons for selecting” the RA growth scenarios ultimately defined in Section 5.5 and then subjected to appraisal in Section 6.

Borehamwood

- 5.4.8. Borehamwood is the primary settlement in the Borough such that it warrants being a primary focus of growth, plus there are growth opportunities relating to: town centre regeneration; very good transport connectivity; a highly strategic employment land offer particularly relating to the film and television industry (with significant recent investment); and close links to Watford and the London Boroughs where growth is challenging.
- 5.4.9. Headline constraints to growth are fairly limited, with perhaps the primary consideration being the sensitive and potentially fragile Green Belt gap to Radlett, to the north. Otherwise it is infrastructure capacity that is the key constraint to growth, in terms of:
- secondary school capacity, as discussed above, with a potential new site for a school previously having been identified at the south east edge of the town;
 - road and junction capacity, particularly on the strategic road network, including recognising that the M1 is reached via Elstree Village; and the M25 via a potentially constrained junction onto the A1 (also in combination impacts on M25 Junction 1); and
 - walking and cycling infrastructure, including noting that key options for strategic growth are to the north and north east ~3km distant from the railway station to the south west.
- 5.4.10. Beginning with **urban sites**, the proposed approach is to allocate 9 sites for a total of 2,283 homes. There are a range of adjustments since the previous consultation stage, when there were 18 candidate sites for a total of ~2,100 homes, although it can be noted that in several cases sites from the previous stage have been combined.
- 5.4.11. None of the sites have planning permission or a live planning application.
- 5.4.12. Taking the proposed urban allocations in turn:
- HBA12 Imperial Place, Maxwell Rd (550 homes) – it is now relied upon to deliver 400 homes in the first five years, which is in contrast to the previous proposal to deliver 221 homes in total by from year 6 onwards. However, there is an anticipated planning application for 555 homes – see <https://www.elstreegardensconsultation.co.uk/>.
 - HBA6 Retail Park Borehamwood (500 homes) – capacity at this site is unchanged, but the latest situation is that availability remains uncertain, and so the site is relied upon to deliver only in the final years of the plan period.
 - HBA9 Hertsmere Civic Offices Cluster (345 homes) – this was previously three separate candidate sites, but overall capacity is broadly unchanged. The anticipated delivery timescale is now brought forward slightly, with delivery from circa year 6.
 - HBA13 Old Haberdasher's Sports Ground, Croxdale Road (200 homes) – this is an urban greenfield site and was previously a candidate site for 95 homes. 200 homes aligns with the proposal set out in the site promoter's consultation response. However, there remain uncertainties given the need to reprovide the existing sports pitches that are currently onsite, and also a need to deliver new accessible greenspace onsite.

- **HBA14** Aycliffe Road and Leeming Road (200 homes) – this is a challenging site as it currently comprises a local centre with a wide range of existing uses. Previous capacity was 65 homes, but it should be noted that the current proposed capacity of 200 homes is relied upon to deliver only in the final years of the plan period.
 - **HBA7** The Point, Shenley Road (200 homes) – the previous capacity was 50 homes, but the site boundary has since been modestly expanded.
 - **HBA11** Elstree Way Cluster (Office building, Shell Garage and Kwik Fit) (170 homes) – previous capacity was 120 homes. Delivery is assumed in the final years of the plan.
 - **HBA10** Borehamwood Fire Station and Job Centre Cluster, Elstree Way (63 homes) – the previous capacity was 36 homes but the site is now expanded. Onsite uses are clearly a challenge and, in turn, the site is relied upon to deliver only in the final years.
 - **HBA8** Regent House & Car Park, north of Allum Lane (55 homes) – capacity is unchanged but the site is now relied upon to deliver in the first five years of the plan.
- 5.4.13. Overall, the proposed approach reflects an ambitious strategy of town centre regeneration and wider urban intensification, and it is clear that it is the outcome of much detailed work, including extensive efforts to engage with landowners. However, it remains the case that there are delivery uncertainties. For some sites the risk is non-delivery in the plan period (potentially with implications for the question of whether total plan period supply matches the total plan period housing requirement), whilst for others the risk is that the site does not deliver as early as anticipated (with implications for the ability of the Council to maintain a five year housing land supply). This is a common issue for many local plans, as predicting supply for complex urban sites is highly challenging, but there are some specific challenges across the sites discussed above. Ultimately, there is no basis to question the site capacities or the timing / phasing assumptions for the purposes of defining RA growth scenarios; however, delivery risks and uncertainties must factor-in, as discussed further below.¹⁸
- 5.4.14. Moving on to **Green Belt sites**, the proposed approach involves allocation of 6 sites for a total of 1,130 homes, which is a significant reduction from previous stage, when the total capacity of the shortlisted candidate sites at Borehamwood was ~5,850 homes.
- 5.4.15. A starting point is four sites that are already committed, namely:¹⁹
- **HBA19** Land North of Barnet Lane (220 homes) – planning permission was granted at appeal in 2024 (23/0937/OUT). The western part of this site comprises the eastern part of Woodcock Hill Village Green Local Wildlife Site (discussed below).
 - **HBA20** Land at Organ Hall Farm, Theobald Street (102 homes) – through the recent consultation the site promoters requested increasing the capacity within the site boundary to 160 homes. This is discussed further below.
 - **HBA18** Land West of Vale Avenue (98 homes) – this was not a candidate site at the previous stage, but it was tested through the RA growth scenarios within the Interim SA Report (2026). It now has a 'resolution to grant' for 98 homes (25/1615/FUL).²⁰
 - **HBA17** Land North of Barnet Lane (West) (74 homes) – the Interim SA Report explained: "... partly permitted for 74 homes (23/0053/OUT). The 'red line' boundary of the preferred site extends beyond the permitted site, but the proposal is nonetheless to deliver 74 homes, with the remaining part of the site a Local Wildlife Site (LWS), plus part of the LWS was recently designated as 'Woodcock Hill Village Green Replacement Land' to compensate for release of an area of the pre-existing Village Green. There is also the context of a live application for 98 homes at [HBA18]."

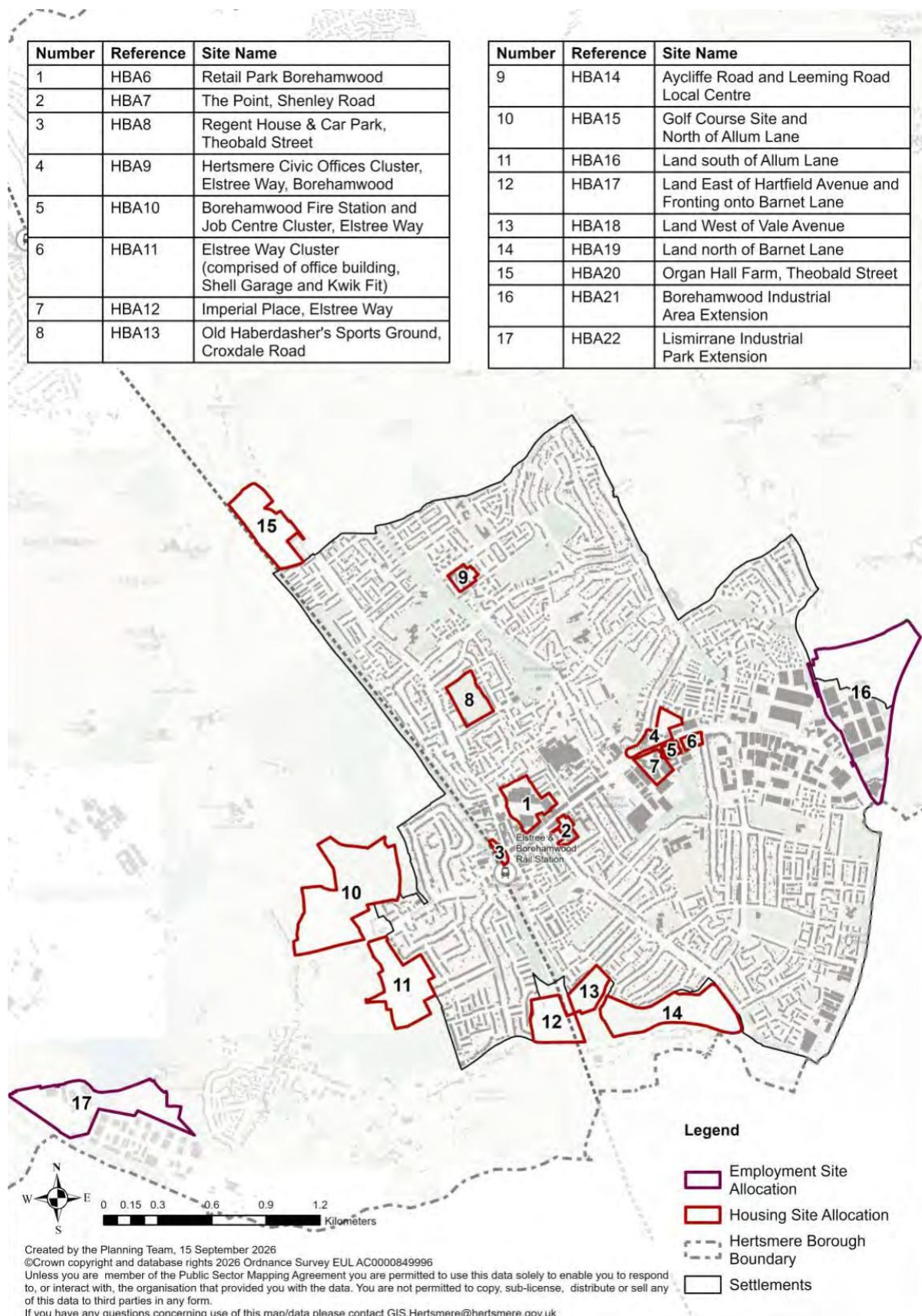
¹⁸ For context, the Interim SA Report (2026) stated: "The seven largest sites have a combined capacity ~1,600 homes and most are associated with a good degree of confidence regarding deliverability, although flood risk will require further detailed consideration at a number of sites. The only clear issue is in respect of a site for 95 homes (Site 22; Old Haberdasher's Sports Ground, Croxdale Road) which is valued urban green space / sports pitches notwithstanding the sports club that currently occupies the site wishes to vacate (there was previously an application for 170 homes in 2016 although this was... withdrawn)."

¹⁹ One other candidate site from the previous stage is now under construction and so not an allocation (Lyndhurst Farm).

²⁰ The Interim SA Report (2026) stated: "The site relates well to the settlement edge and is in relative proximity to the town centre and railway station, but there are sensitivities including relating to the former village green designation."

- 5.4.16. Looking across these four committed sites, a key point to note is that three are located adjacent to one another, directly to the south of the town. This is a sensitive area in biodiversity and landscape terms, such that there is a need to ensure a coordinated and strategic approach to growth in this area, as far as possible. The possibility of a nearby secondary school could also be a matter for ongoing consideration.

Figure 5.4: The proposed submission approach – Borehamwood



- 5.4.17. The next site for discussion is **HBA16** Land South of Allum Lane (150 homes), to the west of Borehamwood, where the majority of the site is the subject of an application for 150 retirement homes (24/0442/FUL), and the proposal is also to relocate the existing Elstree Village GP surgery to the site, as discussed [here](#). At the previous stage the proposed capacity was 241 homes, and the Interim SA Report stated: “... *there is a clear case for a larger scheme that extends south beyond the extent of the planning application site, with a view to a more comprehensive scheme. This is considered a strongly performing site, including as it is mostly well contained and benefits from proximity and good links to the train station and the town centre. However, there is a need to consider the landscape gap to Elstree Village.*” The site promoter is not believed to have responded to the recent consultation, but latest understanding is that an appropriate approach involves assuming a capacity in line with the planning application but also including the field to the south within the allocation boundary.
- 5.4.18. The final proposed allocation is **HBA15** Golf Course Site and North of Allum Lane, Borehamwood (486 homes). Key points to note are as follows:
- The southern part of the site is the subject of a planning application for 136 homes (26/0318/OUT) and was a candidate site for 198 homes at the previous stage.²¹
 - The northern part of the site comprises the southern part of a golf course, and at the previous stage the golf course in its entirety was a candidate site for 1,073 homes, although the option of ‘non-allocation’ was tested through the RA growth scenarios.²²
 - The current assumption is that HBA15 can deliver 186 homes in the first five years. However, there are uncertainties regarding delivery of a comprehensive scheme.
 - There is also the context of nearby site HBA16 to the south east, plus there are two adjacent ‘HELAA supply’ sites for a total of 52 homes adjacent to the south.

Figure 5.5: Concept plan from the planning application for 136 homes



²¹ The Interim SA Report stated: “... the concern is that the proposed density would not make optimum use of the land (thereby increasing pressure for allocations elsewhere). A further consideration is that this site could warrant planning in conjunction with [the golf course]. Overall this is a reasonably strongly performing site, including on the basis of proximity to the train station and as there is a good bus service, with a key issue being the need for comprehensive planning for the broad sector of land west of Borehamwood and east of Elstree Village.”

²² The Interim SA Report stated: “... in combination with [the adjacent planning application site] this site could deliver reasonably comprehensive growth across a key area in proximity to the railway station and town centre (also tube stations to the south at Stanmore and Edgware), as well as along an important bus corridor (also a priority corridor for upgrade in the LCWIP, although the current proposal is only to deliver a new shared use path). Also, the site benefits from an adjacent large park. However, access is challenging and this is particularly the case if access cannot be achieved via [the planning application site], and the risk is a scheme that does not relate well to the settlement, with the Green Belt Assessment (2026) finding the site to perform strongly in terms of preventing the sprawl of large built up areas (such that it is not grey belt). Further constraints relate to: A) mature trees reflecting current use as a golf course, many with a Tree Preservation Order (TPO); and B) the Watling Chase long distance path. It is noted that adjacent land to the west is in the same land ownership...”

5.4.19. Finally, with regards to **omission sites**, three initial considerations are as follows:

- Several urban candidate sites from the previous stage are now not proposed for allocation but there is no basis for questioning this approach.²³
- With regards to the option of increasing the capacity of HBA20 Land at Organ Hall Farm, Theobald Street from 102 homes (as per the current planning permission) to 160 homes, this option is considered to perform poorly. It is recognised that the additional homes could likely deliver early in the plan period (an important factor). However, it would involve development of land proposed for parkland and biodiversity, and there are biodiversity and landscape sensitivities. It would involve extending beyond a hedgerow (shown on historic mapping) into land associated with the confluence of two streams (albeit the streams could then form a defensible northern boundary), the Hertfordshire Way is in proximity and the resulting built form would risk being somewhat incongruous. Biodiversity is likely an important consideration, noting the density of hedgerows and wooded nature of the stream corridors in the area.
- The option of extending HBA15 to the north, to include more of the golf course (as per the previous proposal), is also considered to perform poorly. The site promoter proposes only allocation of the southern part of the golf course (the part now proposed for allocation) with the golf course to the north then retained and extended to the north.

5.4.20. Key omission sites for discussion are then those in the **Well End** area, to the north east of Borehamwood. The previous proposal ('candidate site') was to support a strategic urban extension to deliver 3,750 homes;²⁴ however, there were acknowledged challenges and uncertainties, such that the option of a reduced 2,000 home scheme was tested through the RA growth scenarios. There are three parts to the previously proposed candidate strategic urban extension: A) the western part of the site (west of Well End Road) that is being promoted for 1,200 homes and where there is a live planning application for 154 homes (north of Potters Lane); B) the eastern part of the site (east of Well End Road and north of Rowley Lane) that is being promoted alongside (A), but where there appears to be limited commitment to bringing forward a combined / comprehensive scheme; and C) the south east part of the site (south of Rowley Lane and north of land permitted for an extension to the Sky Studios site) which is being promoted separately for employment land. Overall, there is a concern regarding sub-optimal piecemeal growth in this area, with opportunities missed in terms of addressing issues and maximising the benefits of growth. However, it is reasonable to test the option of a 1,200 home scheme in parcel (A), i.e. land to the west of Well End Road.

5.4.21. The other key omission site for discussion is then HELAA site 359 to the **north of Borehamwood**, which is the subject of a live planning application for 292 homes (25/1713/OUT). It was previously an omission site but featured in the RA growth scenarios, and it remains reasonable to test the option of allocation. Key challenges relate to an onsite Local Wildlife Site (LWS) and a concern around 'sprawl'.

²³ Three were flagged as challenging sites by the Interim SA Report, as follows: "Site 21 (Hollywood Court; 71 homes) – availability remains uncertain given numerous flat owners. The railway station is in very close proximity. • Site 7 (Elstree & Borehamwood Railway Station; 43 homes) – there is a clear case for developing above the station, but this would be technically very challenging. • Site 13 (McDonald's, Elstree Way; 26 homes) – a locally listed building."

²⁴ The Interim SA Report (2026) stated: "... located to the north east of Borehamwood, adjacent to the north of the permitted northern extension to Sky Studios. The western part of this site was previously a proposed allocation for 800 homes in 2021 (but it was not a proposed allocation in 2024, when the proposal was for a lower growth strategy with an element of dispersal), but it is now considered appropriate to consider the option of a comprehensive scheme to maximise the benefits of growth. There would be the potential to deliver a range of non-housing uses and benefits in terms of new and upgraded infrastructure, and there are few headline constraints to growth in this part of the Borough; however, constraints / challenges relate to: A) transport connectivity, given distance to the town centre and railway station and potentially limited capacity at the A1 junction to the south (including noting that it serves extensive existing and committed employment land); and B) a landscape that is associated with a degree of sensitivity, noting topography and the distribution of heritage assets, as well as a high density of historic field boundaries. It will be important to consider the possibility of a reduced scheme that factors-in accessibility / connectivity challenges (albeit higher growth could deliver improvements) and draws upon topography and heritage assets for containment, albeit acknowledging that this would result in trade-offs in terms of delivering infrastructure etc. Finally, it is important to note that a large proportion of the site (specifically all bar the western part of the site that was previously proposed for allocation in 2021) has not been promoted as available (but there could be a reasonable prospect of it becoming available)."

- 5.4.22. There are no other omission sites for discussion. Two site to the south west were previously discussed in the Interim SA Report (sites 341 and 506), but these are now identified as deliverable or developable in the HELAA ('HELAA supply' sites).²⁵ Also, the Interim SA Report discussed the possibility of growth to the north of the golf course to the west of Borehamwood that was previously a candidate site (as discussed above).²⁶
- 5.4.23. In **conclusion**, a key consideration is the need to test higher growth scenarios, with a focus on sites that can deliver early and are associated with limited delivery risk. As such, in addition to the proposed submission approach, it is considered reasonable to test scenarios involving additional allocation of 'Well End' (1,200 homes) and/or HELAA site 359 (292 homes; henceforth referred to as 'North Borehamwood').
- 5.4.24. With regards to the non-committed proposed allocations, HBA15 (Golf Course Site and North of Allum Lane, Borehamwood; 486 homes) is a challenging site in access terms and from a perspective of wishing to ensure a comprehensive approach to growth to the west of Borehamwood, noting sensitivities to the west. It is important to note that the Stage 2 GBA highlights challenging containment and a risk of an incongruous built form such that the site is likely not grey belt. However, on balance it is reasonable to progress this site to the RA growth scenarios as a 'constant' (discussed further below).
- 5.4.25. As such, **four settlement growth scenarios** are progressed to Section 5.5:
- The proposed submission approach = 3,413 homes from allocations.
 - The proposed submission approach **plus** 'North Borehamwood'
 - The proposed submission approach **plus** 'Well End'
 - The proposed submission approach **plus** 'North Borehamwood' and 'Well End'

Potters Bar

- 5.4.26. Potters bar sits comfortably below Borehamwood in the settlement hierarchy, but nonetheless warrants being a key focus of growth, given the strategic context, plus there are settlement-specific growth opportunities relating to: town centre regeneration; good transport connectivity including a very good train service, frequent bus services to underground stations, and a National Cycle Network link (with an aspiration to link this to the town centre). Also, the Draft Plan consultation document in 2024 explained:
- "There is also an older population in Potters Bar compared to the other main settlements, with a higher proportion of over 65 and a lower proportion of under 18s. The town has seen considerably less development over the past two decades than other urban areas in the borough."*
- 5.4.27. Headline constraints to growth are fairly limited, and there is understood to be fewer issues with regards to secondary school capacity in this part of the Borough, but it is important to note two conservation areas located at the northern and southern edges of the town. Also, a broad strategic constraint relates to biodiversity designations, heritage designations and ancient woodlands in proximity to parts of the settlement edge.
- 5.4.28. Finally, a broad strategic consideration is the location of a proposed Government New Town at Crews Hill, to the south east of Potters Bar within LB Enfield (see location map [here](#)), with this also partly a proposed allocation within the emerging Enfield Local Plan.
- 5.4.29. Beginning with **urban sites**, the proposed approach is to allocate 5 sites for a total of 1,227 homes. There are a range of adjustments since the previous consultation stage, when there were 9 candidate sites for a total of ~2,100 homes.

²⁵ The Interim SA Report (2026) stated that these sites: "...could potentially be delivered in combination with [HBA15 and HBA16] in order to deliver a comprehensive approach to growth in this broad area, with a view to maximising the benefits of growth and securing a long term defensible settlement gap to Elstree..."

²⁶ The Interim SA Report (2026) stated: "Issues are: A) this is an LWS; B) there is significant flood risk; and C) extending HBA SA20 further to the north would certainly require a strategic transport solution given the adjacent railway line."

5.4.30. Taking the proposed urban allocations in turn:

- **HPBA6** Tesco Potter Bar (588 homes) – capacity is unchanged but delivery is now assumed only the final years of the plan. This is a site with uncertain availability but where it is considered reasonable to assume it will become available in time.
- **HPBA5** Canada Life Place (369 homes) – capacity is unchanged from the previous stage. A planning application is anticipated (discussed [here](#)), but delivery is still not anticipated until the middle of the plan period, given the existing onsite uses.
- **HPBA7** Bus Garage, High Street (119 homes) – capacity is unchanged but delivery is now not assumed until the final years of the plan period, given onsite uses. The Interim SA Report (2026) previously flagged availability as uncertain, but there is now confidence that development can deliver an improved bus garage.
- **HPBA4** Metropolitan House, 3 Darkes Lane (96 homes) – was previously assumed to deliver 58 homes late in the plan period, but is now assumed to deliver 96 homes in the first five years in line with a recent consent for office to residential conversion.
- **HPBA8** Potters Bar Railway Station Car Park, Darkes Lane (55 homes) – was previously assumed to deliver 98 homes late in the plan period, but is now assumed to deliver 55 homes in the first five years in line with a planning permission.

5.4.31. Overall, the proposed approach reflects an ambitious strategy of town centre regeneration, and it is clear that it is the outcome of much detailed work, including extensive efforts to engage with landowners. However, it remains the case that there are delivery uncertainties, as per the discussion above in respect of Borehamwood. The Tesco site is not known to be available, such that whilst it is appropriate to signal support for redevelopment through allocation, there is a need for caution in respect of assuming supply (even though supply is not relied upon over the early years of the plan period). Also, HPBA5 is flagged in the Viability Study as a challenging site, and the planning permission for HPBA8 involves a building of up to ten storeys and pre-dates recent regulations under which there may be a requirement for a second staircase.

5.4.32. Ultimately, and as per Borehamwood, there is no basis to question the site capacities or the timing / phasing assumptions for the purposes of defining RA growth scenarios; however, delivery risks and uncertainties must factor-in, as discussed further below.

5.4.33. Moving on to **Green Belt sites**, the proposed approach involves allocation of 4 sites for a total of 1,822 homes, which is a significant reduction from the previous stage, when the total capacity of the 4 candidate sites at Potters Bar was ~2,600 homes.

5.4.34. None have planning permission, but at three sites proposals are broadly unchanged:

- **HPBA11** Former Potters Bar Golf Course (550 homes) – was previously proposed for 400 homes, but 550 homes aligns with a current planning application.²⁷
- **HPBA10** Rear of Park Avenue (260 homes) – unchanged from the previous stage.²⁸
- **HPBA12** Dove Lane (112 homes) – was previously proposed for 82 homes, but 112 homes aligns with a current planning application.²⁹

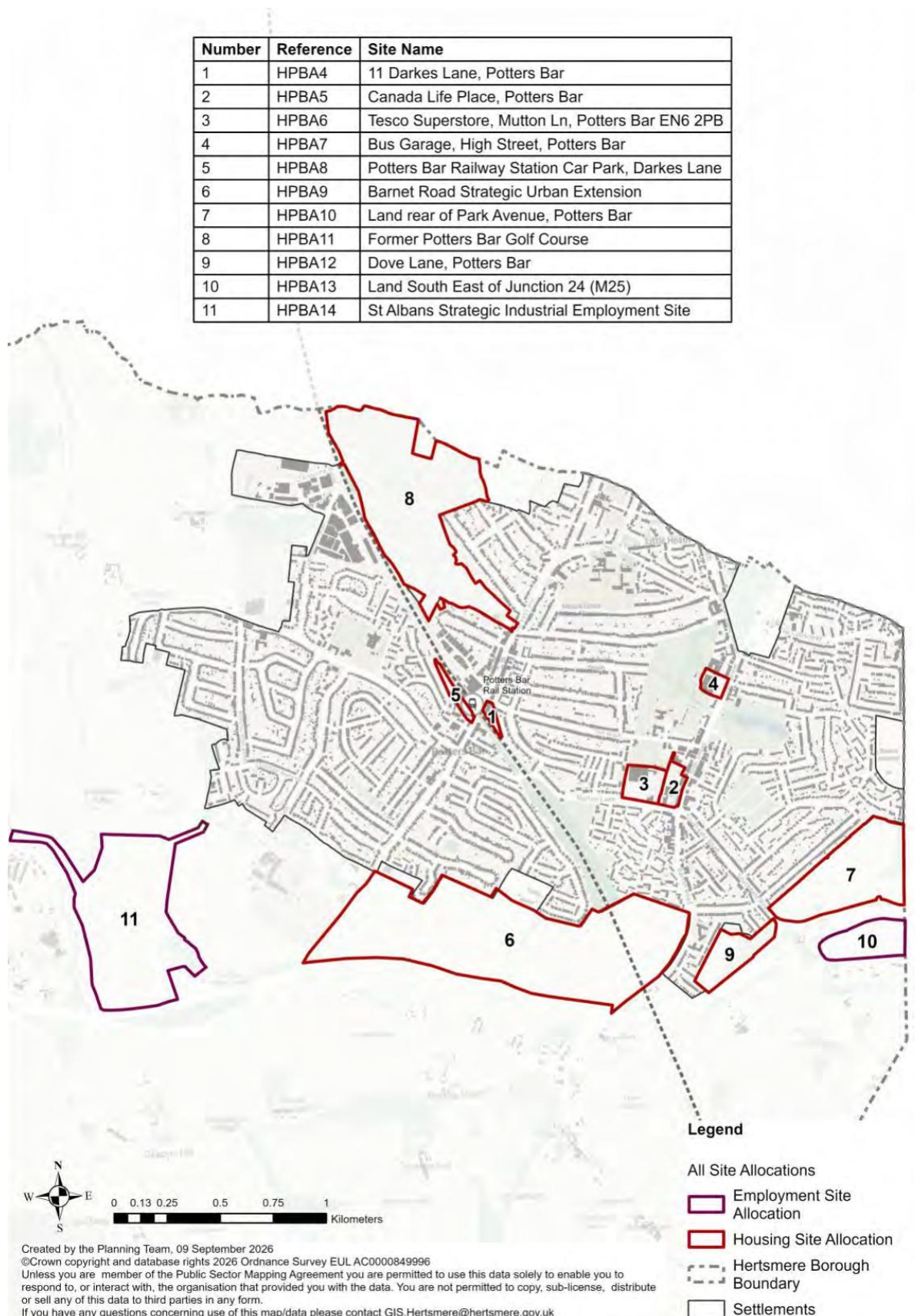
²⁷ The Interim SA Report (2026) stated: "... this site was proposed for allocation not only in 2021 but also in 2024. It benefits from excellent proximity to the railway station, but there are a range of onsite constraints, including a significant flood risk zone, an 'area TPO' (reflecting its former use as a golf course; the site is shown simply as farmland with a series of field boundaries on historic mapping) and an adjacent conservation area. The site capacity has been adjusted to reflect these constraints, and a 400 home scheme would 'round off' the settlement edge. In 2021 and 2024 the proposal was to deliver a primary school, but this is now unconfirmed. N.B. as an update an application was very recently submitted (26/0427/OUTEI)."

²⁸ The Interim SA Report (2026) stated: "... this site has not previously been proposed for allocation but relates well to the settlement edge and is overall subject to limited constraint, although there is a need to consider close proximity to M25 Junction 4, including in terms of achieving access. The site slopes away from the settlement edge but is well-contained by a small woodland and then Potters Chase Wood [a recently planted woodland]."

²⁹ The Interim SA Report (2026) stated: "... this site was proposed for allocation not only in 2021 but also in 2024 (for 95 homes). It relates well to the settlement edge and is very well contained, although the M25 is in very close proximity."

- 5.4.35. It can be noted that HPBA11 is close to the Darkes Lane town centre area, where the rail station is located, whilst HPBA10 and HPBA12 are in proximity to the High Street / Barnet Lane town centre area, which is the historic high street (see [historic mapping](#)). Whilst distant from the rail station, the latter two sites do have good access to A-roads with good bus services (particularly the A111) and a community hospital is close by.

Figure 5.6: The proposed submission approach – Potters Bar



- 5.4.36. The final proposed Green Belt allocation is then **HPBA9** Barnet Road Strategic Urban Extension, Potters Bar (900 homes), which was an omission site at the previous stage, although it was tested through the RA growth scenarios. It was not included in the Draft Plan in 2024, but was previously included in the Draft Plan prior to that (2021) for 900 homes. There is currently a live planning application for 900 homes (plus other uses including a primary school) that was refused by the Council and is now the subject of an uncontested appeal that has been called in by the Secretary of State (24/1101/OUTEI). The appraisal presented in Section 6 of the Interim SA Report (2026) highlighted limited concerns, the site is now shown to have 'moderate' landscape sensitivity by the recent LIA, and it is important to note that the site is expected to deliver early in the plan period, including 200 homes within the crucial first five years. It is acknowledged that a range of detailed issues / challenges are being explored through the current appeal process. However, and on balance, it is considered reasonable to take the site forward to the RA growth scenarios as a 'constant' (see further discussion below).³⁰

Figure 5.7: Site promoter's masterplan for HPBA9



- 5.4.37. Finally, with regards to **omission sites**, two initial points are:

- Several urban proposed / candidate sites from the previous stage are now not proposed for allocation but there is no basis for questioning this approach. One site currently comprises a fire station such that the existing onsite use is a key issue.
- 'Land at Mutton Lane (north)' was previously a candidate site for 1,875 homes but is now unavailable. The Interim SA Report (2026) stated: "... growth here could relate well to the settlement edge, there is an adjacent leisure centre, there are good links to the railway station and the LCWIP identifies the potential for a new segregated cycle path. However, there is a need to carefully consider the scale of growth given a number of constraints, including the Hertfordshire Way, which follows Potters Bar Brook, Furzehill Wood (which is not ancient woodland but is shown on historic mapping) and a cluster of three listed buildings at Mimms Hall. Also, this site has not been promoted as available and has not previously been proposed as an allocation."

- 5.4.38. This leaves a large site to the west as the primary omission site for discussion, specifically a site that comprises the majority of the land between the south west edge of Potters Bar and the permitted data centre (also an allocation, as shown on Figure 5.5) adjacent to the east of South Mimms Services. This site was not a candidate site at the previous stage and was also ruled in Section 5 of the Interim SA Report (2026), i.e. it was not progressed to the RA growth scenarios, with the report stating:

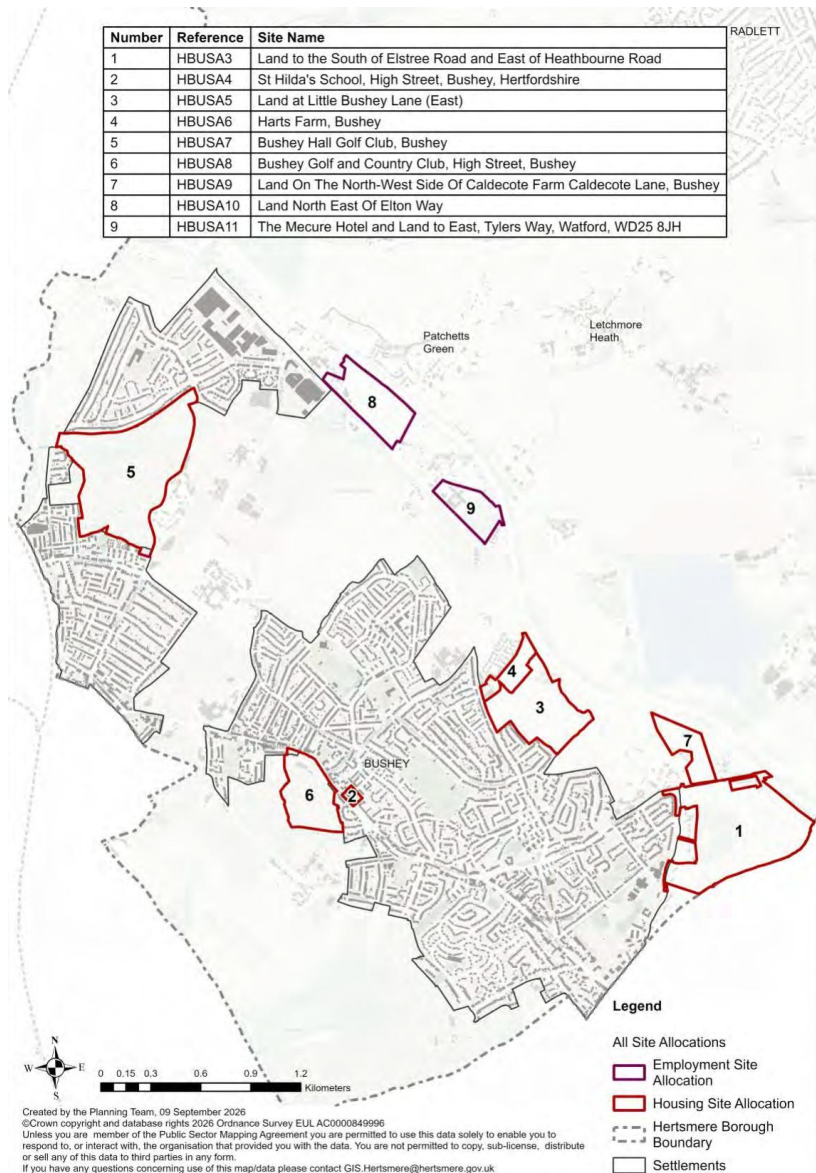
³⁰ The Interim SA Report (2026) also noted the possibility of a reduced scheme and/or additional benefits (e.g. a larger primary school, as envisaged by the draft allocation policy in 2021). However, there is no clear basis for testing any such option.

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

- 5.4.39. The site is 65 ha in total but the submitted concept masterplan suggests only 450 homes in the northern part of the site (north of Bridgefoot Lane / south of the Wroxham School), with the southern part of the site proposed for c.28 ha of employment and commercial uses (either side of the permitted data centre, including directly to the west of Dame Alice Owen school). Access is a key challenge, because the site is bounded to the north by a LWS such that the site does not extend north as far as Cecil Road / Mutton Lane. Specifically, road access would be from Baker Street in the far south (close to the M25 underpass) such that the residential area in the north would be reached via employment land in the south. This is likely a valued farmed landscape, sloping down to the Mimmshall Brook and accessible via public rights of way, albeit affected by the nearby motorways and the permitted data centre. There is also some heritage sensitivity at Bridgefoot. There is no clear need for employment land on this scale, and the housing part of the site could likely not deliver in the earlier years of the plan period (the site is promoted on behalf of Griggs Homes, who are the primary local housebuilder). Overall, there is a clear case for *not* progressing this site to the RA growth scenarios.
- 5.4.40. In **conclusion**, there is only one reasonable growth scenario at the current time, namely 9 allocations for a total of 3,049 homes. There is no clear higher growth scenario at this stage and, whilst it is recognised that HPBA9 was not previously a candidate site, there are reasons to suggest that it is a relatively strongly performing site, such that there is a clear case for allocation given the strategic context (i.e. the stretching nature of LHN, particularly over the early years of the plan period, and the broad spatial strategy). As stated in the Interim SA Report (2026), there is a need to acknowledge that lower growth at Potters Bar would serve to increase pressure for growth at lower order settlements.
- 5.4.41. As a final point, it is important to note that the northern and eastern edges of Potters Bar abut Welwyn Hatfield Borough, and the policies map for the Regulation 19 version of the Welwyn Hatfield Local Plan shows a series of allocations, namely: A) a cluster of 3 sites for 183 homes to the north of Little Heath (only one site for 88 homes is not already permitted); B) a site for 400 homes to the north east of Little Heath; and C) a site for 425 homes to the east of Potters Bar (in proximity to site HBPA10 discussed above).

Bushey

- 5.4.42. Bushey is located in the far south west of the Borough, in close proximity to Watford and the London suburbs, and is in distinct parts which creates a challenge in terms of calculating population and a services/facilities offer. The Bushey area may have a higher services/facilities offer than Potters Bar but does not benefit from a rail station.
- 5.4.43. There are quite clear constraints to growth to the south (including Harrow Weald Common and Stanmore Common) and to the west (the fragile Green Belt gap to Watford and Oxhey), and further key consideration is secondary school capacity (but the emerging Three Rivers Local Plan proposes a new secondary at Carpenders Park, and the near finalised St Albans Local Plan proposes a new secondary at London Colney).
- 5.4.44. Beginning with **urban sites**, the proposed approach is to allocate just one site for 52 homes, namely HBUSA4 St Hilda's School, High Street. This was not a candidate site at the previous stage, but it is noted that the school closed in 2025. It is centrally located on the High Street and there is relatively limited heritage constraint. There is no planning history, but the site is expected to deliver in full in the first five years.
- 5.4.45. It can be noted that all three candidate sites from the previous stage are now ruled out, namely two that comprise a car park (previously suggested for 11 and 17 homes respectively) and one that comprises a car dealership (previously suggested for 19 homes). As relatively small sites these need not be considered further here.

Figure 5.8: The proposed submission approach – Bushey

5.4.46. Moving on to **Green Belt sites**, the proposed approach involves allocation of 6 sites for a total of 2,741 homes, which compares to 5 candidate sites for a total of ~3,000 homes at the previous stage. Beginning with the two sites that are broadly unchanged:

- **HBUSA5** Land at Little Bushey Lane (280 homes) – is now anticipated to deliver in full in the first five years given a pending planning application (refused and currently being appealed; an earlier application for 310 homes was refused at appeal).³¹
- **HBUSA8** Bushey Golf and Country Club, High Street (250 homes) – was previously an allocation for 200 homes in 2021 and then 165 homes in 2024, and then it was a candidate site for 286 homes earlier in 2026. This is Council-owned land and partly PDL, with the PDL part of the site located along Bushey High Street in between two conservation areas and adjacent to a significant cluster of heritage assets (Bushey Rose Garden and a grade 2 listed church built in 1904). A key consideration relates to the extent and location of built form within the site, with a clear commitment to delivering a significant new area of public open space. This is an accessible location, including given good links to Bushey Station and with the A411 a “core active travel corridor” in the LCWIP and associated with a bus service enhancement opportunity.

³¹ The Interim SA Report (2026) further explained: “... was previously an allocation for 350 homes in 2021, plus land for a primary school and a neighbourhood centre. This was then followed by a planning application for 310 homes plus land for a primary school and a community/mobility hub, which was refused and dismissed at appeal. Most recently a planning application for 280 homes and a ‘community facility / mobility hub’ was refused in March 2026... (24/1522/OUT).”

- 5.4.47. The next site for discussion is than **HBUSA7** Bushey Hall Golf Club, Bushey Hall Drive (500 homes), which was granted permission for 350 homes in 2025 (24/1022/OUT), along with land for a new medical centre and extensive publicly accessible open space. The recent consultation response received from the site promoter proposes an allocation for 500 homes, and this is taken forward as the proposed allocation. The increase in capacity clearly leads to a challenge in terms of fragmenting woodlands (this is former parkland, as shown on historic mapping, and two of the woodland patches are APIBs in the LNRS, although none of the woodland is ancient woodland), and there are TPOs outside of the woodland patches, but there are limited concerns in respect of addition growth having a significant bearing in terms of settlement separation. The additional homes would not deliver any significant additional benefits, but this is an area in close proximity to Watford (although links appear to be challenging). The assumption is that 250 homes would deliver in the first five years of the plan period, but there is perhaps a degree of uncertainty ahead of a new planning application for the site. The site promoters summarise the case for additional capacity as follows:

“The Site is sustainably located, with access to shops, facilities and employment in Bushey and Watford. The Site has good public transport links and strongly aligns with the principles of creating genuinely walkable and cyclable places. The approved access strategy, via Bushey Mill Lane and Bushey Hall Drive provides a strong basis for additional growth for 550 dwellings. The two approved access arrangements and surrounding junction capacity were not demonstrated to be operating close to any capacity threshold which provides confidence...”

Increasing the site allocation to 550 dwellings will continue to retain and enhance the significant blocks of woodland and mature trees and landscaped areas , as well as to protect and enhance the unbuilt areas of the Site, which will form part of the new publicly accessible open space... Optimising the site capacity for residential development will continue to safeguard the visual and physical open characteristics of the Site.”

- 5.4.48. On balance HBUSA7 is taken forward to the RA growth scenarios with the new proposed 500 home capacity as a constant.

Figure 5.9: Permitted compared to expanded scheme (site promoter submission)

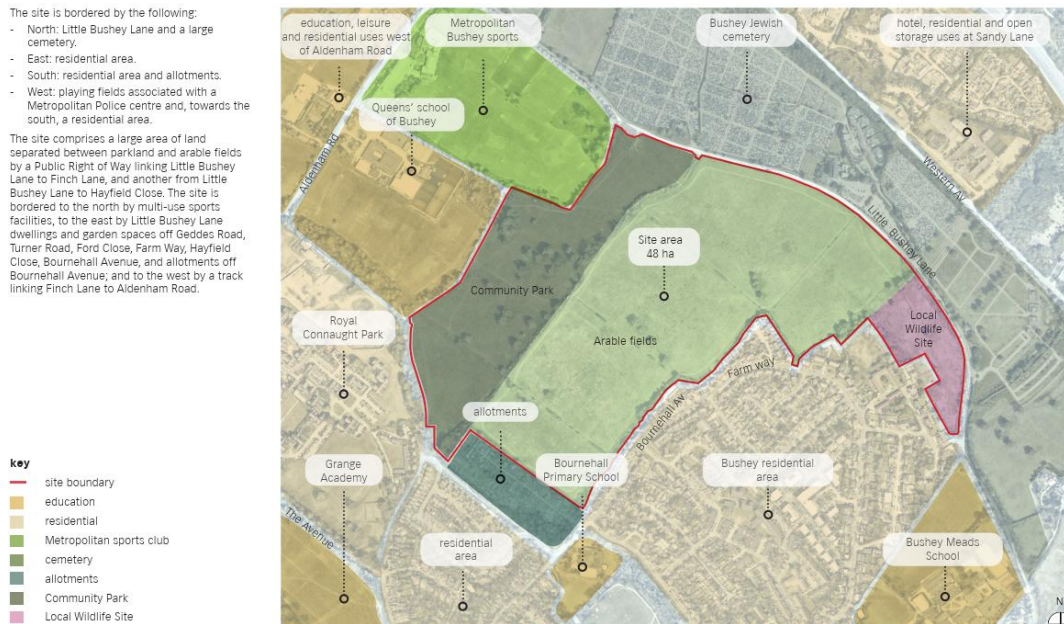


- 5.4.49. The next proposed Green Belt allocation for discussion is **HBUSA3** Land to the South of Elstree Road and East of Heathbourne Road (1,500 homes), which was previously a candidate site for 1,300 homes, with the Interim SA Report (2026) stating:

“...previously an allocation for 800 homes in 2021, with the intention of at the time that 25% of the homes should be for older people. The situation now is that there is a planning application (24/0692/OUTEI) for a 1,300 home new community with the headline as follows: “... *reclaim a previous landfill site to create an exemplar and innovative phased Intergenerational Continuing Care Community development based on principles of social prescribing and Age Friendly place-making.*” There is a question-mark regarding the site capacity, but a lower density scheme would likely have serious implications for the scheme vision and what it could deliver, e.g. a new local centre.”

- 5.4.50. It is important to highlight the additional 200 homes capacity as uncertain, given the pending planning application and the specific nature of the proposed scheme. Also, there are some constraints affecting the site, including two APIBs (and the entirety of the site is forms part of the ACIB network; see the LNRS). Furthermore, the assumption is that 150 homes will deliver in the first five years of the plan period, but this could feasibly be affected by any need to resubmit a new planning application (also, it can be noted that there is now a new proposed allocation adjacent to the north, discussed below). However, on balance HBUSA3 is taken forward to the RA growth scenarios with the new proposed 1,500 home capacity as a constant.
- 5.4.51. The two final proposed Green Belt allocations are new sites since the previous stage, but both generate limited concerns such that they are taken forward as a constant:
- **HBUSA9** Land on the NW side of Caldecote Farm Caldecote Lane (154 homes) – is adjacent to HBUSA3, although located on the opposite side of the A411. It benefits from relatively good containment and road access, but a constraint is proximity to the M1, including noting the slope of the land. It will be important to consider in-combination issues and opportunities in respect of the A411 (e.g. a cycle route). It is also noted that there are three HELAA supply sites for a total of 63 homes in this area.
 - **HBUSA6** Harts Farm, Little Bushey Lane (57 homes) – is adjacent to HBUSA5 and is a logical site assuming allocation of HBUSA5.³² The current plan document states: “*The site provides an opportunity to consolidate the built form on Little Bushey Lane and make effective use of previously developed land. Its relationship with the adjoining site allocation at Land at Little Bushey Lane provides an opportunity to create a coherent eastern edge to Bushey. The redevelopment of the site can improve landscape structure, surface-water management and connections to surrounding neighbourhoods.*” However, coordination with HBUSA5 could be challenging, and it is noted that the plan document states that: “*Development must be “coordinated with Land at Little Bushey Lane where necessary to ensure a coherent movement network, settlement edge, drainage strategy and infrastructure solution.*” The plan document also refers to the need for masterplanning to “*gain an understanding of the cumulative traffic impacts of growth and how it can be managed. This specifically applies to possible impacts to Little Bushey Lane, the A41 and M1 Junction 5.*”
- 5.4.52. Finally, with regards to **omission sites**, the key site for discussion is Land rear of Farm Way (north), or ‘Compass Park’. This site was a candidate sites for 802 homes at the previous stage (and was held constant across the RA growth scenarios) and previously was a draft allocation for 750 homes in 2021. It is also the subject of a planning application for 700 homes (25/0972/FULEI), as part of which the proposal is to make land available for a primary school and also deliver a significant new area of parkland, which would likely provide a long term defensible boundary to this northern edge of Bushey, given existing uses to the north. Whilst it is recognised that the proposal is now for significantly higher growth from other proposed Green Belt allocations at Bushey, relative to the previous stage earlier in 2026, this site does clearly need to be taken forward to the RA growth scenarios for further consideration (**‘North Bushey’**), given the strategic context, and as it was previously seen as a relatively strongly performing site.

³² The Interim SA Report (2026) stated in respect of HBUSA5: “... *there could be additional growth opportunity aimed at securing comprehensive growth between Bushey and the M1 and maximising the benefits of growth, e.g. a new primary school in this area could be well-located. Also, the Landscape Study (2020) identifies relatively limited sensitivity in this area. Rossway Drive is a recent scheme located to the north of Site 4 that delivered on PDL but were Site 4 to be allocated there could be a case for additional growth to the north to consolidate the built form in this area. However, this is a less accessible part of Bushey and there are challenging links to the strategic road network.*”

Figure 5.10: A figure from the 'Compass Park' planning application (or 'North Bushey')

5.4.53. There are no other omission sites that specifically warrant discussion, but it is appropriate to present a high level discussion of other feasible growth opportunities around the edge of Bushey (N.B. text is largely unchanged from the Interim SA Report):

- **North Bushey** – to the northwest is an area of land that forms the gap to Watford and is subject to flood risk. The only other significant area of undeveloped land is then to the north, where consideration has previously been given to a park and ride. This land does require ongoing consideration but could be better suited to employment land given the adjacent M35 junction. Elsewhere around North Bushey it is difficult to envisage significant growth options given existing uses (and recalling HBUSA7). There could be merit in giving strategic consideration to the broad sector of land south of North Bushey, with a view to consolidating the wide range of existing uses (some of which are shown in Figure 5.10) and providing confidence that there will not be erosion of this settlement gap over time. Also, it can be noted that the Landscape Study (2020) identifies this area as one of the lowest sensitivity parts of the Borough. However, at the current time there is only one HELAA site in this area that does not relate well to the settlement edge and comprises former landfill.
- **North of Bushey** – to the north west are existing uses including the Grange Academy, Bushey Manor Field and the Royal Connaught Park. Directly to the north of Bushey is then the 'Compass Park' omission site discussed above. There are important in-combination considerations in respect of growth in this area alongside growth to the east of Bushey, particularly in terms of traffic along Little Bushey Lane linking to Junction 5 of the M1, plus links to Bushey High Street are challenging.
- **East** – this is the location of three proposed allocations, but there remains a need to give ongoing consideration to remaining land, with a view to ensuring a comprehensive approach to growth in this area, including from a transport connectivity perspective.
- **South of Bushey** – HBUSA3 is at the eastern extent of this sector but otherwise it is difficult to envisage further strategic growth opportunity, given constraints and also noting the boundary with LB Harrow (who recently adopted a Local Plan).
- **West of Bushey** – this is the location of HBUSA8, where development would have the effect of somewhat rounding-off the settlement edge, and then there is a clear strategic case for resisting further growth in order to maintain the integrity of the settlement gap to Watford and respecting the characteristic association of Bushey Heath with raised land, i.e. acknowledging that land falls away quite steeply from the settlement edge towards. However there may be some further modest opportunities.

- Edge of Watford/Oxhey – there are two adjacent pending planning applications for sites within Three Rivers along the A4008 and one of these abuts Hertsmere Borough (25/1055/FUL) and now has a resolution to grant planning permission. The adjacent field within Hertsmere is being actively promoted to deliver an extension of the scheme within Three Rivers (HELAA site 357), but there is significant surface water flood risk and a scheme that extends into Hertsmere would not relate well to the existing settlement edge of Oxhey. Consideration could be given to comprehensive growth at the edge of Oxhey within Hertsmere, potentially to include HELAA site 357, but this is not a clear option at the current time (the only other HELAA site comprises allotments) and the effect would be to significantly erode the settlement gap to Bushey.³³
- 5.4.54. Finally, for context, it can be noted that Carpenders Park, which is located to the south of Oxhey / Watford Heath, is proposed strategic growth through the Regulation 19 version of the Three Rivers Local Plan; and the Draft London Plan also proposes strategic growth in this area, specifically to the north of Hatch End, which is within LB Hillingdon. These growth locations are not adjacent to the Hertsmere, but are nearby.
- 5.4.55. In **conclusion**, lower growth is ruled-out on balance (see discussion above)³⁴ but there is a clear case for testing a higher growth scenario involving allocation of one omission site, namely North Bushey (also known as Compass Park). The assumption is a 700 homes and it is also reasonable to assume it can deliver early in the plan period.
- 5.4.56. As such, **two settlement growth scenarios** are progressed to Section 5.5:
- The proposed submission approach = 2,793 homes from allocations.
 - The proposed submission approach **plus** 'North Bushey'

Radlett

- 5.4.57. Radlett is an affluent rural settlement with a distinct village character and a lower offer in terms of services and facilities, although there is a busy and popular district centre along Watling Street. The railways station is easily accessible from most locations, but the Transport Study (2023) identified challenges in respect of bus, cycle and highway links. Also, it is noted that in the LCWIP none of the top 14 priority corridors for investment are located at Radlett. However, there is the possibility of a major cycle infrastructure upgrade along Theobald Street to link Radlett with Borehamwood at a cost of ~£12m.
- 5.4.58. There is very limited local employment and then a key issue is that Radlett does not have a secondary school. There have been calls for a secondary school at Radlett (e.g. [here](#)), but the Draft Plan consultation document in 2024 reported: *"The education authority has advised that Radlett would not be a suitable location for a new secondary school due to its distance from Watford and Bushey and due to it being too small to support its own secondary school."* The Interim SA Report (2026) then stated that *"this will be a key issue to explore through the current consultation"* although also noted the recent context of proposals/options for new schools at Carpenders and London Colney, plus there is potential for a new secondary school not far away at Bowmans Cross.
- 5.4.59. A final introductory point to note is a proposed allocation adjacent to the north of Radlett within the St Albans Local Plan, namely Harper Lane (274 homes), which includes PDL.
- 5.4.60. Beginning with **urban sites**, there are currently no proposed allocations, but both of the candidate sites from the previous stage are now 'HELAA supply' sites (given capacity below 50 homes) for a total of 47 homes. The capacity of one of the sites is reduced from 20 to 10 homes. The Interim SA Report (2026) stated: *"... it can be noted that the lower of two density assumption options is applied for each of the sites (if the higher density assumption were to be used the combined capacity would be 111 homes)."*

³³ One of the two sites in Three Rivers currently the subject of a planning application is shown clearly on a map [here](#), which also shows the Hertsmere Borough Boundary. The field adjacent to the south east of the site is the subject of separate planning application 25/1055/FUL. It is this latter site that abuts and could feasibly be extended into Hertsmere.

³⁴ The Interim SA Report (2026) discussed how there is potentially a strategic case for lower growth at Bushey, given its position in the settlement hierarchy, but ruled this out on balance, given the specific merits of the candidate sites at the time.

- 5.4.61. Moving on to **Green Belt sites**, there are proposed approach involves allocation of 5 sites for a total of 2,635 homes, which compares to 5 candidate sites for a total of ~2,850 homes at the previous stage.
- 5.4.62. Beginning with **HRA4** Land South Of Shenley Road (195 homes), this site was recently granted permission at appeal (24/1211/OUT). The site is within ~1km of the railway station, well-contained by woodland, includes safeguarded land for a primary school expansion (safeguarded for 10 years) and safeguarded land for a medical centre (safeguarded for 5 years, with the land to deliver affordable housing (the baseline proposal is 50%) if the medical centre is not delivered, noting a peripheral location).

Figure 5.11: The proposed submission approach – Radlett



- 5.4.63. The next proposed allocation for discussion is **HRA5** Home Farm Meadows (650 homes), which was previously a candidate site for 1,040 homes. The Interim SA Report (2026) flagged this as a “challenging” site, but on balance it was taken forward to the RA growth scenarios as a constant. The Interim SA Report stated:

“[HRA5] is located to the south of Radlett and a planning application is likely forthcoming, with the site promoter having consulted on a ‘garden suburb’ scheme of 600 homes alongside a primary school, a neighbourhood centre and other uses. A concern is that 600 homes would not make best use of the site, and a further consideration is the need to consider a combined scheme with the field adjacent to the north that abuts the settlement edge (HELAA site 0033-2). The site benefits from road access onto the A5183 (Watling Street), and as discussed there is an opportunity here for a strategic cycle upgrade, but there is a need to consider the capacity of this key north/south road link, including noting potential growth west of Borehamwood. Also, a single road access point could limit the number of homes that can be delivered. A further constraint is the Hertfordshire Way, which runs through the site and links to a series of villages/hamlets and heritage assets to the west. Finally, it is noted that this is likely an area of better quality agricultural land in the Borough.”

- 5.4.64. Some previous concerns are allayed on account of the new proposal for 600 homes,³⁵ and by the new proposal to additionally allocate the “field adjacent to the north” (see discussion below). The site is not expected to deliver until the middle part of the plan period, but once again can be progressed to the RA growth scenarios as a constant.

- 5.4.65. The current plan document states the following in respect of HRA5:

“It will be comprised of comprehensive mixed-use developments with compatible residential, commercial, community and main town centre uses. It will deliver new walkable neighbourhoods with an integrated network of walking and cycling routes, including improved active travel networks that access Radlett District Centre and the railway station, and have the potential to extend beyond to adjoining settlements. The delivery of the strategic urban extension will also secure other social and community infrastructure improvements, including proportionate investment in local public transport; public realm and environmental enhancements. The latter is anticipated to include new public open space and improvements for nature in line with the aims of the LNRS.”

Figure 5.12: Site promoter concept plan for HRA5



³⁵ The Interim SA Report (2026) stated: “... consideration should be given to the possibility of a more modest scheme... focused on land adjacent to the A5183. However, it is recognised that there would be implications for what the scheme could deliver...”

- 5.4.66. The next proposed Green Belt allocation for discussion is **HRA6** Kemprow Farm, Watford Road (1,573 homes), which comprises two adjacent previous candidate sites (previously proposed for 1,162 homes) plus additional land to the north east (adjacent to the urban edge). The largest part of HRA6 was a candidate site for 972 homes at the previous stage, and prior to that, in 2021, was mostly proposed for 350 homes and a primary school. The current plan document states the following in respect of HRA6:

"It will be comprised of comprehensive mixed-use developments with compatible residential, commercial, community and main town centre uses. It will deliver new walkable neighbourhoods with an integrated network of walking and cycling routes, including improved active travel networks that access Radlett District Centre and the railway station, and have the potential to extend beyond to adjoining settlements. The delivery of the strategic urban extension will also secure other social and community infrastructure improvements, including proportionate investment in local public transport; public realm and environmental enhancements. The latter is anticipated to include new public open space and improvements for nature in line with the aims of the LNRS.

... The comprehensive development of the strategic urban extension must secure a defensible Green Belt Boundary to site's northern and western edges to retain the visual separation between Radlett and Watford. In particular, the existing hedgerows that demarcate the northern edge of the site must be reinforced...

... It will be a walkable place, with a diverse mix of homes, including genuinely affordable homes that are supported by compatible education, health, community, leisure and recreation facilities."

- 5.4.67. Overall, this is considered to be a relatively strongly performing site, as per the equivalent conclusion reached in the Interim SA Report (2026). There are landscape sensitivities in this area ('moderate-high' sensitivity), but the new site boundary provides confidence that development will relate suitably well to the settlement edge. However, there is a need for further scrutiny of what can be delivered, particularly in terms of schools capacity. The site specific policy refers to the need to give consideration to on-site schools capacity, but there is no firm requirement. A scheme of this size would typically deliver a primary school, but there is also a need to give consideration to the possibility of delivering a secondary school for Radlett (see discussion below).
- 5.4.68. Finally, the Interim SA Report discussed how the western extent of HRA6, which is separate ownership, relates relatively poorly to the settlement edge, such that it might be reconsidered if land to the south is not also allocated, namely Land South of Watford Road and West of New Road, which is now an omission site, as discussed below.
- 5.4.69. On balance, it is reasonable to progress HRA6 as a 'constant'. However, there is a need for ongoing scrutiny of containment / defensible boundaries and the potential for a comprehensive scheme that maximises benefits (potentially a secondary school).
- 5.4.70. The final two proposed Green Belt allocations are new sites since the previous stage, but give rise to limited concerns such that they are progressed as a 'constant':
- **HRA3** Land west of Watling Street (122 homes) – is adjacent to HRA5 and is a logical site for allocation on the assumption that HRA5 is allocated. Indeed, it relates better to the existing urban edge than HRA5, such that it could be allocated in isolation. There is a clear case for a coordinated scheme in combination with HRA5, with a view to avoiding issues (e.g. ensuring good access, noting bridleways) and potentially realising opportunities (e.g. improved active travel links into Radlett).³⁶
 - **HRA2** Land South of Theobald Street (95 homes) – is located to the south east of Radlett and was previously a proposed allocation for 55 homes in 2024 and was also a proposed allocation in 2021. The site relates well to the settlement edge and is in proximity to the centre of Radlett and the railway station. The Interim SA Report (2026) stated that it "should be revisited for potential allocation at the next stage."

³⁶ The Interim SA Report (2026) stated: "[HRA3] is located adjacent to [HRA5] and would certainly need to be considered for allocation in combination with [HRA5] with a view to a suitably comprehensive scheme. However, it appears unlikely that the site could be allocated in isolation due to challenging access (it would likely require access via [HRA5])."

- 5.4.71. Finally, with regards to **omission sites**, the key site for discussion is Land South of Watford Road and West of New Road, which was previously a candidate site for 450 homes. It is located adjacent to the south west of HRA6, but does not relate well to HRA6 given the nature of the settlement edge and the intervening B462 Watford Road.
- 5.4.72. The Interim SA Report (2026) progressed the site as a 'constant', but did flag concerns regarding the risk of sprawl towards Bushey/Watford. The report suggested that “... *the potential to secure a comprehensive western expansion of Radlett that maximises the benefits of growth, and it could perhaps be that there is the potential to secure or facilitate the delivery of a secondary school. It is also noted that there is a large and relatively modern primary school located adjacent to the site.*” It is also noted that this land is owned by the County Council.³⁷ However, in practice it is not clear that allocation would increase the potential to deliver a secondary school. On balance, it is reasonable to rule the site out at this stage, i.e. it is not progressed to the RA growth scenarios.
- 5.4.73. The other omission site discussed within the Interim SA Report (2026) was land to the north of the north of the town and west of Watling Street. The Interim SA Report stated: “... *a key issue is bisected by a flood zone. However, the eastern part of the site could potentially deliver a modest scheme.*” The site promoters then responded to the consultation promoting the site for 500 homes and land for a secondary school, and work was then undertaken to consider the possibility of a comprehensive large-scale strategic urban extension in combination with HRA6 (which is adjacent, having accounted for the new proposed eastward extension). However, the latest understanding is that the site is unavailable.
- 5.4.74. Finally, looking beyond HELAA sites, attention focuses on the north east of Radlett, including noting that the Landscape Study (2020) identified this area as relatively low sensitivity. In the north of this area (adjacent to the Harper Lane site in the St Albans Local Plan) the settlement edge is defined by Kitwells Brook, but the valley of the brook could potentially be drawn upon for containment. In the south of this area (adjacent to Shenley Road) is a large golf course (associated with former parkland; see [historic mapping](#)), which could potentially suggest a degree of opportunity. However, transport connectivity in this area appears to be challenging and this is the gap to Shenley.
- 5.4.75. In **conclusion**, there is only one reasonable growth scenario at the current time, namely 5 allocations for a total of 2,635 homes. There is no clear reasonable lower growth scenario, but there is a need for an ongoing focus on ensuring comprehensive growth to the west, with a view to avoiding sprawl and wider issues and maximising planning gain.

Figure 5.13: A table from the Transport Study (2023)

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

Shenley

- 5.4.76. Shenley is the largest of the three villages but there is significant committed growth and there are constraints including in terms of landscape (see the Landscape Sensitivity Study, 2020) and the historic environment. Shenley has an extensive historic core – the largest conservation area in the Borough – and then to the north is a housing estate developed in the 1990s on the site of a [former hospital](#) alongside a neighbourhood centre.

³⁷ The Interim SA Report (2026) noted that: “... *at London Colney the St Albans Local Plan proposes to allocate a site owned by HCC for 324 homes alongside land for a secondary school.*”

- 5.4.77. A further strategic consideration is primary school capacity, with the consultation response received from HCC in 2024 flagging a significant surplus in school places and explaining: “Consistently large surpluses can prejudice schools’ financial sustainability and make maintaining high educational standards more challenging.” This is an important consideration given an ageing population and a small reduction in population locally between 2011 and 2021.

Figure 5.14: Surplus in primary school places across the Borough (2024)

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

- 5.4.78. In 2021 the proposal was for a comprehensive scheme to the west of the historic core (the grounds of former Shenley Grange) to deliver 240 homes alongside a community hub and a new village green, plus there was also a modest site proposed to the north east. In 2024 the proposal was for a smaller Shenley Grange scheme of 180 homes.
- 5.4.79. The situation now is that two sites are now permitted to the west of the historic core, namely a site permitted for 95 homes in 2025 (24/1618/FUL) and a site permitted at appeal for 103 retirement homes and a community facility in 2025 (23/1795/OUT). Also, a site to the north east was recently permitted for 38 homes (25/1347/FUL). Finally, it can be noted that HRA4 at Radlett (recently permitted for 195 homes) is in proximity to the west, and furthermore there is a pending planning application for 200 homes at former Harperbury Hospital (Harper Green) to the north (25/0885/OUTE1).³⁸
- 5.4.80. The Interim SA Report (2026) stated:
- “Whilst there is a case for supporting smaller sites at villages with strong viability and that are well suited to delivering early in the plan period, and allocations at villages could enable lower growth at higher order settlements (see discussion above), at Shenley there is considered to be limited case for allocating any sites over-and-above those with planning permission. Attention focuses on land to the west of the historic core, where there is land available over-and-above the two sites with planning permission, but there now appears to be no potential for a comprehensive scheme in this area, e.g. one that: A) delivers a road link between London Road and Radlett Lane; and B) avoids sprawl along and potentially increases accessibility to the Kitwells Brook valley.”*
- 5.4.81. This statement still broadly holds true, although by way of an update:
- West of the historic core – a site adjacent to the south of the aforementioned site that recently gained permission for 95 homes, and which has planning permission for one or two new homes, is now being promoted for 70 homes. The possibility of a combined comprehensive scheme might be reconsidered, as per previous proposal.
 - North Shenley – a site to the west is being promoted for 250 homes (and a community centre) and a site to the east is being promoted for 500 homes and a primary school. However, this is a rural location and there is no clear strategic case for growth on this scale. Proximity to Radlett and Harper Green can also be noted.
- 5.4.82. In **conclusion**, given sites with planning permission there is just one reasonable growth scenario, namely no allocations over-and-above commitments. Ongoing consideration should be given to the possibility of comprehensive growth to the west of the historic core to deliver benefits, but there is currently no clear option for appraisal.

³⁸ This is a cross-border planning application with St Albans, and there is not considered to be a strong strategic case for further development here. The consultation response received from the site promoters states that the site could deliver early in the plan period, but it is not clear that the proposed scheme would assist with developing Harper Green as a sustainable community (e.g. noting the lack of a primary school) and the concern is a risk of ongoing piecemeal expansion.

Elstree Village

- 5.4.83. Elstree Village is a smaller village but benefits from good access to higher order settlements and strategic employment areas. Landscape and historic environment constraints are similar to Shenley, and again there is significant committed growth.
- 5.4.84. A key consideration is Elstree's proximity to proposed growth locations to the west of Borehamwood and to the west of Bushey (as discussed above). Also, there is a permitted employment site (a proposed allocation, discussed below). Traffic is clearly a challenge, with the village located at the crossroads of two A-roads (until recently this was an air quality management area) in proximity to a number of higher order centres.
- 5.4.85. In both 2021 and 2024 the proposal was for 90-140 homes to the north west of the village and around 100 homes to the south east, with the latter site comprising public sector owned land (HCC). The situation now is that the site to the north east has a resolution to grant planning permission ([23/1123/FUL](#)) for retirement housing, and there is also a pending planning application for an "Integrated Retirement Community (IRC) of 90 extra care units (Use Class C2)" to the north east ([24/1663/FUL](#)). The latter site is well contained by woodland but nonetheless could contribute to a sense of sprawl / merging of settlements along Barnet Lane. Also, it is far from clear that there is a need for further homes for older people in this area, noting: the nearby committed site; an existing large care home centrally located within the village; the option of large scale schemes nearby at the eastern edge of Bushey and the western edge of Borehamwood; and a case to be made for focusing older persons housing at higher order settlements.
- 5.4.86. The Interim SA Report (2026) stated:
- "Whilst there is a case for supporting smaller sites at villages with strong viability and that are well suited to delivering early in the plan period, and allocations at villages could enable lower growth at higher order settlements, at Elstree Village there is considered to be limited case for allocating any sites over-and-above those with planning permission. Attention focuses on land to the south east, noting that this is public sector land such that there would be good potential to deliver public benefits alongside new homes, e.g. new accessible open space or a play / recreation / sports facility. However, it is recognised that whilst Elstree Village is associated with a distinct ridge of raised land the land in question to the south east is lower / descending land towards the M1 and London and serves a role as a landscape buffer on this basis. Finally, there is a need to acknowledge existing committed and potential additional growth in proximity to the village at Bushey and Borehamwood plus employment land growth west of the village."*
- 5.4.87. This statement still broadly holds true, and there are not considered to be any omission sites that warrant further discussion at this stage.
- 5.4.88. In **conclusion**, given sites with planning permission there is considered to be just one reasonable growth scenario, namely no allocations over-and-above commitments.

South Mimms

- 5.4.89. South Mimms is a small village that is washed over by the Green Belt and where there is no committed growth (there has not been significant housing growth for many decades).
- 5.4.90. There is a primary school and there are nearby employment opportunities, including at the M25 / A1(M) service station. However, the conservation area covers the entirety of the village south of the B556, historic character continues to north along Blackhorse Lane, and then there is just one small area of 20th century housing to the north east (see [historic mapping](#)). and there are no pending planning applications.
- 5.4.91. Virtually all surrounding land is available for development, and the possibility growth might be envisaged to consolidate the village and add to the local offer (with the village then inset from the Green Belt) with careful consideration given to the extensive conservation area at the heart of which is a prominent Grade 1 listed church. However, an important consideration is that Bowmans Cross is located a short distance to the north, and a new settlement here would need to link to Potters Bar via South Mimms.

- 5.4.92. In 2021 the proposal was for a comprehensive ‘village growth strategy’ involving consolidation of the existing somewhat dispersed built form to deliver a total of 260 homes alongside: a primary school expansion (the existing school has just 84 pupils, as reported [here](#), which could create a challenge for viability); a new village green; accessible open space including along Catherine Bourne River; and a new village shop. As part of this there would have been open space in proximity to the prominent and centrally located Grade I listed church. In 2024 the proposed approach was then amended significantly, with just one proposed allocation for 85 homes.
- 5.4.93. The Interim SA Report (2026) discussed the latest situation as follows:
- *“Virtually all land around the village has been promoted as available for development.*
 - *There remains a strategic case for growth as per that which led to the proposed strategy in 2021, including with a view to maintaining and boosting village vitality.*
 - *It is also the case that the latest strategic context in respect of local housing need (LHN) borough-wide is such that there is a strong argument for supporting smaller sites at villages able to deliver relatively early in the plan period (with a view to avoiding or minimising the need for a stepped housing requirement).*
 - *It is also important to acknowledge that whilst, on the one hand, the new emphasis on ensuring that spatial strategy / site selection aligns with vision-led transport principles can suggest a need to limit growth at villages, on the other hand well-targeted village growth can help to maintain and potentially expand the local offer in terms of services and facilities (also bus services) and therefore reduce car dependency.*
 - *If Bowmans Cross comes forward, then growth would be in close proximity and the new settlement would link to Potters Bar via South Mimms, plus there is a need to consider pressure on the woodland complex between South Mimms and Bowmans Cross, which includes Redwell Wood SSSI.”*
- 5.4.94. By way of an update, there are now two ‘HELAA supply’ sites that are assumed to deliver 50 homes over the plan period. These sites are located centrally within the historic core, such that they need careful consideration. However, growth should bring benefits, e.g. in terms of village vitality and ensuring a viable local primary school.
- 5.4.95. In **conclusion**, at this stage it is not clear that there is a reasonable alternative to the proposed approach of two ‘HELAA supply’ sites to deliver 50 homes. There is a clear case for revisiting the possibility of growth here following progress on Bowmans Cross.

Figure 5.15: An extract from the 2021 Draft Plan summarising the strategy for villages

3. Supporting larger rural communities and growth of key villages

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

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

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

Table 4: Distribution of growth of key villages development

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

Bowmans Cross

- 5.4.96. As discussed above, Bowmans Cross new settlement has been repeatedly consulted upon over a number of years, and a planning application was very recently submitted (26/1330/OUTEI). At the previous stage it was explored as a variable across the RA growth scenarios,³⁹ and the Interim SA Report introduced key issues as follows:
- *“This new settlement option has been consulted on repeatedly over recent years.*
 - *HCC does not object, but St Albans District Council (SADC) does strongly object noting that the new settlement would link closely to London Colney in SADC, plus the Environment Agency has concerns given a range of existing minerals and waste uses.*
 - *Much of the site is degraded land due to existing and past minerals and waste uses.*
 - *There are environmental sensitivities, with a key woodland network adjacent to the east (including Rodwell Wood SSSI) and the River Colne corridor to the north.*
 - *The site promoters currently propose ~5,000 homes to include a range of other uses including a secondary school, but there is a need to consider a higher density scheme to deliver a town centre and significant employment land, e.g. 7,500 homes.*
 - *The site is arguably well contained in Green Belt / landscape terms, with the River Colne to the north, rising land and woodlands to the east and the M25 to the west.*
 - *Major strategic transport upgrades and an overall vision-led approach to transport planning is fundamentally important, but there is a need to recognise that the site will deliver over the very long term, such that detailed plans would evolve over time (albeit allocation requires a level of confidence in respect of achievability/deliverability).*
 - *Detailed work has been completed by the site promoters who envisage a planning application in 2026 (under the presumption in favour of sustainable development).⁴⁰”*
- 5.4.97. The option of allocation was broadly found to perform favourably through the appraisal of RA growth scenarios within the Interim SA Report, albeit the appraisal also flagged a range of challenges and uncertainties. A key point is that the site is now anticipated to deliver 2,500 homes in the plan period, compared to the previous assumption of 500 homes. This is a major point in favour of allocation. However, it is also important to acknowledge that there remain delivery uncertainties, including relating to onsite minerals and waste operations and delivery of new strategic road infrastructure. At the previous stage one of the arguments in favour of assuming 500 homes delivery in the plan period was around ensuring time to plan for strategic infrastructure.
- 5.4.98. In **conclusion**, at this stage it is reasonable to progress Bowmans Cross new settlement to the RA growth scenarios as a ‘constant’.⁴¹

³⁹ The Interim SA Report (2026) stated: “On the one hand, at this stage in the process there is a strong case for progressing the option of a new settlement at Bowmans Cross to the RA growth scenarios as a ‘constant’, recognising that it has been repeatedly consulted on over a number of years, and given the new strategic context in respect of a much higher LHN figure (also understanding of challenges to growth at the existing settlements, as discussed above). Progressing Bowmans Cross to the RA growth scenarios as a ‘constant’ would also allow attention to focus on key choices elsewhere to a greater extent. However, on the other hand, it remains the case that there are significant challenges associated with Bowmans Cross, including a range of concerns repeatedly highlighted by St Albans District through their consultation responses over the years. Also, there is the context of devolution and Local Government Reform (LGR) such that there is a case for deferring decision-making to a future local plan, e.g. for SW Herts.”

⁴⁰ Clearly new settlements should ideally be allocated through a Local Plan; however, ‘speculative’ planning applications for new settlements are not unusual nationally given the number of out-of-date Local Plans. For example, in Swale Borough in Kent there are currently four pending ‘speculative’ planning applications for new settlements including one for ~10,000 homes.

⁴¹ This is similar to the situation in respect of Hemel Garden Communities (HGC) which is a large-scale strategic urban extension to Hemel Hempstead that is allocated through both the emerging Dacorum Local Plan and the recently adopted St Albans Local Plan. For both local plans, whilst HGC was explored as a variable across the growth scenarios appraised within the Interim SA Report published at the Regulation 18 Draft Plan stage, by the time of the Regulation 19 stage the decision was taken to hold HGC constant across the growth scenarios. The St Albans Local Plan Inspectors’ Report (2026) states: “One constant held throughout the Regulation 19 SA was the allocation of the Hemel Garden Communities (‘HGC’). But this had already been tested through the Interim SA at Regulation 18. Conclusions reached at that stage, and throughout the Plan’s final preparation, found that there were no reasonable alternatives to strategic scale growth elsewhere. This was largely due to uncertainties regarding the ability of other strategic sites to deliver. It was a reasonable judgement to make, particularly given the long history of the HGC, having first been awarded Government funding in early 2019. Consequently, there was no need for the SA to revisit fundamental strategic options at that stage.”

Figure 5.16: Illustrative masterplan for Bowmans Cross from the recent planning application

Conclusion on settlement scenarios

- 5.4.99. This section has considered settlements in turn and for each settlement reached a conclusion on whether: A) the emerging preferred approach should be progressed to the RA growth scenarios as a 'constant' or B) the approach to growth should be a 'variable'.
- 5.4.100. Ultimately two settlements are progressed as a variable, namely: 1) Borehamwood – the proposed submission approach plus three reasonable higher growth scenarios; and 2) Bushey – the proposed submission approach plus one reasonable higher growth scenario. The other six settlements are progressed as a constant, i.e. only one reasonable growth scenario is taken forward (the proposed submission approach).
- 5.4.101. It is acknowledged that a number of the decisions are reached 'on balance', notably:
- Borehamwood – HBA15 Golf Course Site and North of Allum Lane, Borehamwood (486 homes) is held constant on balance but is acknowledged as a challenging site that warrants ongoing scrutiny, including because it is likely not grey belt.
 - Borehamwood – the omission site referred to as 'Well End' is progressed to the RA growth scenarios on the assumption of a 1,200 home scheme, but there remains a case for considering larger scale strategic growth, e.g. to deliver a secondary school.
 - Potters Bar – HPBA9 Barnet Road Strategic Urban Extension is held constant on balance despite not having been presented as a candidate site at the previous stage, and despite details matters currently being explored through an ongoing appeal.
 - Bushey – under the higher growth scenario the concern is in respect of overall growth quantum at Bushey, given the position of the town in the settlement hierarchy and also noting some traffic / transport challenges. However, the site that would deliver higher growth ('Bushey North') is considered to be a relatively strongly performing site (e.g. with land proposed for a primary school) and, were it to be allocated, there could be scope to reduce the capacity of certain other proposed allocations.
 - Bushey – following on from the point above, sites HBUSA3 and HBUSA7 are progressed to the RA growth scenarios as a constant, but at both sites there is a case for a reduced capacity (perhaps circa 350 homes in total) to bring site capacities back into line with proposals from the previous consultation ('candidate sites') stage.

- Radlett – is held constant, but there is a need for further work to confirm what can be delivered both to the south and to the west of the town. In particular, to the west there is a need for ongoing scrutiny of containment / defensible boundaries and the potential for a comprehensive scheme that maximises benefits (potentially a secondary school).
- Villages – the approach to growth at the villages was also held constant across the RA growth scenarios within the Interim SA Report (2026). At that time the decision at South Mimms was flagged as one reached 'on balance', but the situation has now changed with South Mimms expected to deliver 50 homes over the plan period. There are no clear growth options at Elstree, given recent/committed growth and constraints (mindful of nearby proposed growth). Finally, at Shenley there are numerous potential growth options, including strategic growth options, but there is no clear strategic case for growth. Ongoing consideration should be given to ensuring a comprehensive approach to growth across the collection of sites to the west of the historic core, as per past proposals, albeit these sites now mostly have planning permission.

5.5. Reasonable alternative growth scenarios

5.5.1. The final task is to define reasonable alternative (RA) growth scenarios defined as alternative approaches to supply from:

- Non-allocated commitments – as discussed, the total supply from sites that are already committed is 2,148 homes, but a number of these sites are proposed allocations, which leaves 1,072 homes supply from non-allocated commitments.
- A windfall assumption – the new windfall assumption is 678 homes, which is a reduction on the previous assumption. It is appropriate to take a conservative approach to windfall supply that primarily projects forward past trends. However, rates could potentially increase under the new 'presumption' rules within the 2026 NPPF.⁴²
- HELAA supply sites – as discussed, the HELAA identifies 38 sites with a capacity under 50 homes as deliverable / developable with a total capacity of 772 homes. These sites are not 'allocated' but are assumed to deliver within the plan period.
- Allocations – as discussed in Section 5.4, for six settlements there is just one reasonable growth scenario, namely the proposed submission approach, whilst Borehamwood there are four growth scenarios and for Bushey two growth scenarios.

5.5.2. This leads to 8 feasible RA growth scenarios, however the highest growth scenario is ruled out on balance, namely a scenario involving higher growth at Bushey (additional allocation of 'North Bushey') alongside the highest growth scenario at Borehamwood (additional allocation of 'North Borehamwood' and 'Well End'). This would involve a total plan period supply of 19,084 homes, such that total supply would be 15% above LHN. There is limited case for this level of growth, but also there is a pragmatic need to minimise the number of scenarios, with a view to an accessible and engaging appraisal.

5.5.3. In summary, the RA growth scenarios at this stage are:

- 1) Proposed submission approach (supply = 16,892)
- 2) Proposed submission approach plus N. B'wood (supply = 17,184)
- 3) Proposed submission approach plus N. Bushey (supply = 17,592)
- 4) Proposed submission approach plus Well End (supply = 18,092)
- 5) Proposed submission approach plus N. B'wood and N. Bushey (supply = 17,884)
- 6) Proposed submission approach plus N. B'wood and Well End (supply = 18,384)
- 7) Proposed submission approach plus N. Bushey and Well End (supply = 18,792)

⁴² For example the Minister for housing and planning recently published a [letter](#) emphasising that "For development proposals within settlements, or those outside settlements that are supported in principle, a universal tilt in favour of granting permission is engaged... This tilt in favour is a clear representation of the government's commitment to a planning system that is an enabler of appropriate development."

- 5.5.4. These are considered to be the reasonable alternatives at the current stage, in light of the discussion set out above. As part of this, a key point is that testing higher growth scenarios involving Green Belt omission sites is important due to uncertainties around supply from challenging urban sites (both plan period supply and supply early in the plan period) and supply from Bowmans Cross (plan period supply). Equally, given these supply uncertainties there is limited strategic case for testing lower growth scenarios and, in any case, it is difficult to pinpoint proposed allocations under Scenario 1 where there is a clear site-specific case for testing scenarios that would involve non-allocation.
- 5.5.5. The RA growth scenarios are presented in the table below. It is important to be clear that Scenario 1 is the proposed submission approach (or 'preferred option', PO).
- 5.5.6. Finally, note that employment land supply is held constant across the scenarios, as is the supply of Gypsy and Traveller pitches, as discussed further in Section 6.

Table 5.1: The reasonable alternative growth scenarios (with constants greyed-out)

	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6	Scenario 7
	PO	Plus N. B'wood	Plus N. Bushey	Plus Well End	Plus N. B'wood and N. Bushey	Plus N. B'wood and Well End	Plus N. Bushey and Well End
Commitments (non-allocated)	1,072	1,072	1,072	1,072	1,072	1,072	1,072
Windfall assumption	658	658	658	658	658	658	658
HELAA sites < 50 homes	772	772	772	772	772	772	772
Borehamwood allocations	3,413	3,705	3,413	4,613	3,705	4,905	4,613
Potters Bar allocations	3,049	3,049	3,049	3,049	3,049	3,049	3,049
Bushey allocations	2,793	2,793	3,493	2,793	3,493	2,793	3,493
Radlett allocations	2,635	2,635	2,635	2,635	2,635	2,635	2,635
Bowmans Cross	2500	2500	2500	2500	2500	2500	2500
Village allocations	0	0	0	0	0	0	0
Total homes 2024/5 to 2042/3	16,892	17,184	17,592	18,092	17,884	18,384	18,792
% over LHN	2%	4%	6%	9%	8%	11%	13%

6. Growth scenarios appraisal

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

- 1) Proposed submission approach (supply = 16,892)
- 2) Proposed submission approach plus N. B'wood (supply = 17,184)
- 3) Proposed submission approach plus N. Bushey (supply = 17,592)
- 4) Proposed submission approach plus Well End (supply = 18,092)
- 5) Proposed submission approach plus N. B'wood and N. Bushey (supply = 17,884)
- 6) Proposed submission approach plus N. B'wood and Well End (supply = 18,384)
- 7) Proposed submission approach plus N. Bushey and Well End (supply = 18,792)

Methodology

6.1.2. Under each sustainability topic the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of 'significant effects' using red / amber / light green / green:

- **Red** indicates a significant negative effect
- **Amber** indicates a negative effect of limited or uncertain significance
- **Light green** indicates a positive effect of limited or uncertain significance
- **Green** indicates a significant positive effect
- **No colour** indicates a neutral effect

6.1.3. Within the appraisal discussions there is a particular focus on the 'variables', but the supply components that are a 'constant' feed into conclusions on significant effects.

6.1.4. Finally, note that the aim is to minimise repetition of text from Section 5.4.

Assumptions

6.1.5. Key assumptions are as follows:

- The baseline – a key assumption is in respect of the future baseline, i.e. the situation without an adopted plan with a robust land supply, i.e. sufficient to deliver on the housing requirement. Specifically, the assumption is that there would be sub-optimal growth under the presumption in favour of sustainable development (accounting for Policies S3, S4 and S5 in the 2026 version of the NPPF, which applies for the purposes of decision-making). This could potentially involve sub-optimal piecemeal development, including recalling pending and anticipated planning applications.
- Growth quantum – it is not always appropriate to conclude a preference for lower growth (Scenario 1) from an environmental perspective, despite inevitable localised impacts. This is because: A) low growth could risk a housing supply trajectory that lacks robustness due to the lack of a sufficient supply headroom (i.e. sufficient supply over-and-above the housing requirement), leading to a risk of 'the presumption'; and B) if higher growth were to enable a higher housing requirement then there could be the possibility of contributing to unmet housing needs arising from neighbouring areas, thereby minimising pressure for growth elsewhere within a constrained sub-region.
- Delivery – there is a need to make assumptions regarding what precisely could be delivered by sites, including in terms of use mix, infrastructure and affordable housing.

6.2. Air quality

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
=	=	=	=	=	=	=

- 6.2.1. There are no air quality management areas (AQMA) in the Borough although there are a number of traffic congestion hotspots where air quality is potentially problematic or could become problematic under growth scenarios, including acknowledging the likelihood of significant growth in neighbouring areas, including a potential new town at Crews Hill (Enfield).
- 6.2.2. Higher growth could lead to challenges, but equally the baseline situation is one whereby air quality is improving nationally.⁴³ Also, there is a need to recognise that Hertsmere is generally well-connected in transport terms, that air quality is more of an issue in some neighbouring areas (notably Watford and all neighbouring London Boroughs) and that unmet housing need within any sub-region is problematic for strategic transport planning.
- 6.2.3. Overall, it is difficult to confidently and meaningfully differentiate between the growth scenarios. One matter for consideration is the combined effect of higher growth at Borehamwood alongside growth at Bushey and Radlett on the crossroads in the centre of Elstree Village where an AQMA was recently revoked, but it is difficult to suggest a significant concern. A further consideration is the possibility of growth at all four of the main settlements in combination leading to increased traffic within the centre of St Albans, where there is a small AQMA at the A1086 / A5183 junction.
- 6.2.4. The Interim SA Report (2026) stated: *“Moving forward, a key priority is confirming that the housing requirement will be set at LHN and then iteratively confirming the spatial strategy / proposed allocations with a view to enabling strategic transport planning including a focus on ‘sustainable transport’ interventions.”* The latest situation is that the housing requirement is confirmed but there remains a need for further work in respect of transport strategy, including confirming the issues and opportunities associated with each of the allocations and their in-combination effect on traffic congestion (and, in turn, the potential for active travel and high quality bus connectivity).
- 6.2.5. A final consideration is growth near to sources of air and noise pollution including motorways. This is notably an issue for ‘constant’ sites to the south of Potters Bar and a new proposed allocation to the east of Bushey (also a constant across the scenarios).

6.3. Biodiversity

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
		2		2		2

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

⁴³ Air quality is set to improve as the national car fleet moves away from internal combustion engine (ICE) vehicles, but air quality will remain an issue, including as the weight of electric vehicles (EVs) leads to increased particulates pollution.

- 6.3.2. Specifically, one of the two variable sites, namely 'North Borehamwood (292 homes) is currently designated as a Local Wildlife Site (LWS). However, work through the planning application process may reach a conclusion that the LWS warrants de-designation because the land has been ploughed for arable cultivation. Also, there is a stream corridor and historic field boundary along the point of access to the site. Finally, there is broadly a concern with piecemeal expansion along the northern edge of Borehamwood (an adjacent site is under construction), although concerns would be allayed were there to be confidence that LWS to the west will remain designated.
- 6.3.3. At 'North Bushey' (700 homes) there is an adjacent LWS, which would be protected and enhanced, although there would be recreational pressure, and the potential to amend the masterplan (as understood from the current planning application) to better connect the LWS to the large area of parkland in the north of the site might be considered.
- 6.3.4. At 'Well End' (1,200 homes) there is overall limited biodiversity constraint, but there is a dense network of historic field boundaries, and a related network of surface water flood zones. Also, the concern here is sub-optimal piecemeal growth with opportunities missed to deliver new strategic green and blue infrastructure to deliver on the objectives of the Local Nature Recovery Strategy (LNRS).
- 6.3.5. On balance, the appraisal conclusion reflects a particular concern with 'North Borehamwood'. With regards to significant effects, a key consideration is that strong viability supports a proposed policy requirement for 20% biodiversity net gain; however, on balance neutral effects are predicted, including as 20% could be challenging at some sites on viability grounds.
- 6.3.6. Final considerations are:
- Sites to the south of Borehamwood are sensitive but are already committed.
 - The large proposed site to the south east of Bushey is sensitive and the new proposal is to support a higher density scheme relative to the current planning application. Also, the proposal to support the northern-most allocation for 500 homes, as opposed to 350 homes in line with the planning permission, gives rise to a biodiversity challenge.
 - Bowmans Cross is closely associated with an important woodland complex that includes Redwell Wood SSSI, and also because the River Colne corridor to the north of Coursers Road is clearly a broad area of sensitivity (also potentially opportunity). However, on the other hand, much of the land is currently degraded such that there would likely be the potential to deliver a significant *onsite* biodiversity net gain. Also, there would be good potential to masterplan with biodiversity as a priority objective, and there could be the potential to fund or facilitate some targeted offsite interventions, e.g. well-managed access to nearby woodlands. However, the site promoter's masterplan does suggest housing in close proximity to areas of sensitivity. Finally, in respect of Bowmans Cross, it is important to say that biodiversity objectives feed into a clear argument for planning with a long term perspective, i.e. giving early consideration to any options for an expanded scheme.
 - At Potters Bar there is support for limiting growth to the north and west of the town, and also noting current proposed allocations in Welwyn Hatfield. Also, there is a degree of constraint affecting the golf course site, but this has fed into site capacity
 - At Radlett there is a need to consider the effect of growth adjacent to and potentially enveloping woodlands around the settlement edge.

6.4. Climate change adaptation

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
=	=	=	=	=	=	=

- 6.4.1. The key issue here is flood risk, although it is acknowledged that the matter of overheating risk is also a significant consideration for the Local Plan given the high urban growth strategy that is assumed as a 'constant' under all of the scenarios.
- 6.4.2. Focusing on flood risk, whilst this has fed-in strongly as a factor influencing the selection of sites for inclusion within the growth scenarios, and a Level 2 Strategic Flood Risk Assessment (SFRA) has been completed, there are still a number of sites within Scenario 1 (i.e. sites that are a 'constant' across the scenarios) with an element of risk. These are mainly urban sites, where past lower intensity uses may partly be a reflection of flood risk but where there is now a wider sustainability case for intensifying uses, including given the potential to address flood risk through design and construction.⁴⁴
- 6.4.3. With regards to the three 'variable' omission sites that feature across the scenarios, all are subject to a degree of surface water flood risk, but it seems unlikely that this would act as a significant barrier to effective masterplanning or unduly affect site viability, given the potential to design-in green / blue infrastructure and high quality sustainable drainage systems (SuDS). At all three sites, potentially most notably the sites at Borehamwood, downstream surface water flood risk affecting existing residential areas is a consideration, but high quality SuDS can typically ensure 'greenfield runoff rates'.
- 6.4.4. Overall, whilst the Environment Agency raised limited concerns in respect of flood risk through the recent consultation, it is appropriate to flag a 'moderate or uncertain' negative effect ahead of further consultation informed by the Level 2 SFRA and sequential test outcomes.
- 6.4.5. Final considerations are:

- Borehamwood – the new proposed lower growth strategy to the west is supported. Also, were future consideration to be given to a higher growth strategy in the Well End area then there would be a need to factor-in a significant valley and associated surface water flood zone as part of masterplanning.
- Potters Bar – the new proposal not to support growth to the north west is potentially supported on flood risk grounds. The Interim SA Report (2026) stated: "... *there is a significant network of fluvial and surface water flood zones to the north west, which would need to factor-in to masterplanning for a strategic urban extension here, and could serve as an argument for lower growth in this area. However, on the other hand, valleys and associated flood zones can help to frame and contain growth and provide a framework under which to plan green/blue infrastructure.*"

With regards to the strategic urban extension to the south, whilst there are no fluvial flood zones intersecting the site there are several surface water flood corridors, particularly in the east of the site (a key area in terms of accessing the town centre and strategic road network), and there is a need to consider downstream flood risk affecting existing residential areas. However, there is likely the potential to deliver a strategic scheme that avoid and mitigates flood risk, including through high quality Sustainable Drainage Systems (SuDS) without having to significantly compromise on wider objectives, e.g. delivery of a primary school.

⁴⁴ The Interim SA Report (2026) stated: "*It is understood that certain urban sites have been removed on account of flood risk, which is an important consideration, as pressure to demonstrate a strongly 'brownfield first' approach can lead to pressure to intensify uses on urban sites that have historically been seen as appropriate for only low intensity uses (e.g. car parks, industry, commercial, offices) due to flood risk. For example, in St Albans ten urban sites have recently been removed from the plan due to flood risk.*"

Finally, flood risk is well-understood as a significant constraint to developing the golf course site located a short distance to the north of the railway station, but there is understood to be confidence in the ability to avoid and mitigate risk.

- Bushey – there are relatively limited concerns, but there is a degree of surface water flood risk affecting growth to the east. Matters are being explored through current planning application, accounting for the proposed masterplan and SuDS.
- Radlett – there are relatively limited concerns, but there is a degree of surface water flood risk affecting the site to the south, including at the proposed point of access.
- Bowmans Cross – the northern part of the site is quite closely associated with the River Colne, and there is downstream flood risk affecting London Colney, but it is difficult to suggest any significant concerns because SuDS can likely deliver greenfield rates of surface water runoff, or even a betterment. Opportunities for strategic flood water attenuation could feasibly be explored (but there are already lakes in this area).

- 6.4.6. Briefly returning to the matter of urban intensification leading to overheating risk under climate change scenarios, one site to highlight is an urban green space (sports pitches) site in Borehamwood (Old Haberdasher's Sports Ground, Croxdale Road) which is proposed for 200 homes (previously proposed for 95 homes). There is significant urban greenspace in this northern part of Borehamwood, but there is nonetheless a need to give careful consideration to loss of urban greenspace from a climate change adaptation perspective. It is also noted that the site partly intersects a surface water flood zone.

6.5. Climate change mitigation

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
=	=	=	=	=	=	=

- 6.5.1. The focus under this topic heading is per capita built environment decarbonisation, given that transport decarbonisation factors-in under the 'transport' heading.
- 6.5.2. Development viability is generally strong in Hertsmere, which suggests good potential to deliver 'net zero' developments, and this is the proposed overarching policy requirement within the proposed submission plan. However, viability varies significantly between sites, in particular urban versus non-urban sites, as discussed in the Viability Study (2026), with the implication that there will likely be some sites that cannot deliver 'net zero' development in practice without compromising on wider objectives (e.g. affordable housing, infrastructure delivery and biodiversity net gain).
- 6.5.3. On the other hand, it is acknowledged that there is a broad climate change mitigation / decarbonisation case to be made for a high urban growth strategy, as discussed within the series of Climate Change Studies (2026) that have been completed in support of the plan. Also, there is support for the proposed significant focus of growth at Radlett because viability here is very strong, such that there is excellent potential to deliver 'net zero' developments.
- 6.5.4. With regards to the three sites that are a variable across the scenarios, none are thought to be proposing 'net zero' development, and overall it is not clear that any are associated with a particular built environment decarbonisation opportunity. At Well End there could feasibly be 'net zero exemplar' opportunity to be explored were there to be support for a large-scale strategic urban extension in this area, but there is uncertainty ahead of detailed work to consider development costs (e.g. major transport upgrades) and, in turn, viability 'headroom'.

- 6.5.5. Overall, it is not possible to differentiate between the scenarios and a 'neutral' effect is predicted. This contrasts to the 'moderate or uncertain' negative effect previously predicted within the Interim SA Report earlier in 2026, reflecting the detailed work that has since been completed, namely the series of three Climate Change Studies and the Viability Study.
- 6.5.6. Moving forward, there should be an ongoing focus on delivering net zero carbon schemes with a specific aim of minimising peak strains on the electricity grid, as discussed within the Climate Change Studies. This could include strategic scale schemes well suited to integrating communal battery storage, and feasibly heat networks or a 'micro-grid' that integrates communal renewable power generation. An effective grid is key for the achievement of national decarbonisation targets, grid capacity issues risks blackouts, and minimising the need for electricity is key for household energy bills. Focusing on Bowmans Cross, there are a range of encouraging proposals as part of the current planning application, but these require further scrutiny, with a view to ensuring that decarbonisation and minimising peak strains on the grid is a key consideration feeding into masterplanning and design work from the outset.

6.6. Communities 1: Education

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
2	3	2	2	2	2	 1

- 6.6.1. The Interim SA Report (2026) stated:

"... secondary school capacity has long been understood to be a key issue for the Local Plan, but planning for secondary school capacity is challenging, both because it is difficult to identify preferred locations for new and/or expanded schools and because the baseline situation is constantly shifting as neighbouring areas explore growth scenarios and consider potential locations for new schools (in particular, the latest situation is that the St Albans Local Plan is near finalisation, and proposes a new secondary at London Colney, and the Three Rivers Local Plan is nearing finalisation and proposes a new secondary at Carpenders Park)." It will be for Hertfordshire County Council (HCC) to comment in detail (once again) through the current consultation, but the current appraisal aims to flag support for strategic growth at both Borehamwood and Bowmans Cross (in particular) given potential to deliver a new secondary. It is also important to note that the approach to growth at Radlett is held 'constant' across the growth scenario on balance, with the settlement notably lacking a secondary school."

- 6.6.2. The latest situation is *potentially* improved because there is the potential for a strategic urban extension to Radlett (held constant across the growth scenarios) to deliver a secondary school. This could be a major benefit, but there remain major uncertainties.
- 6.6.3. Otherwise there are thought to be limited concerns regarding schools capacity, in light of the Infrastructure Delivery Plan (IDP), but secondary school capacity is also an ongoing consideration for Borehamwood, and schools capacity in support of high urban growth can be a challenge. Sites at Bushey not delivering a
- 6.6.4. With regards to the three variable sites, 'North Bushey' would deliver a new primary school (specifically, land would be made available), which is considered to be a significant benefit. This could be an important consideration noting that none of the other proposed allocations are set to deliver a school. A further consideration at Bushey is that growth could exacerbate challenges in respect of secondary school capacity.

- 6.6.5. At 'Well End' the current proposal is to deliver a special educational needs school, but the concern is that growth at this scale should also deliver a primary school. Also, the site promoters have provided a concept masterplan for a much larger scheme that would not deliver a primary school. The site does benefit from good access to existing schools, including a secondary, but large strategic urban extensions are an opportunity to deliver new capacity.
- 6.6.6. Overall, there is support for allocations that would deliver new schools capacity. With regards to significant effects, neutral effects are predicting noting the ongoing uncertainties regarding secondary school capacity in the west of the Borough.

6.7. Communities 2: Services

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
?	?	?	?	?	?	?

- 6.7.1. The Interim SA Report (2026) stated:

"... planning for healthcare is challenging because the NHS requires flexibility such that it can be difficult to be certain that land provided will ultimately be taken up. Having said this, what can be [said] is that strategic growth locations give rise to an excellent opportunity to deliver new healthcare facilities, and overall there are not known to be any significant concerns under any of the scenarios. The other key consideration is then town centre regeneration, which is assumed as a 'constant' under all scenarios. There is very strong support for the ambitious regeneration strategies, informed by ongoing visioning and wider workstreams."

- 6.7.2. Also, the Interim SA Report stated:

"There is no doubt that the spatial strategy must be infrastructure-led, in so far as possible (in the context of competing objectives), both in terms of: A) distributing growth (between settlements and between specific locations), in line with infrastructure issues and opportunities; and B) supporting strategic growth locations (including clusters of sites) well suited to delivering new or upgraded infrastructure alongside new homes."

- 6.7.3. At this stage a key consideration is the proposed town centre regeneration strategies for both Borehamwood and Potters Bar, with it being the case that detailed work is ongoing but overall there is uncertainty regarding what can be viability achieved (and when). Also, certain of the sites are in an existing community use, such that re-providing for existing uses is a matter for ongoing consideration, plus it is acknowledged that town centre regeneration takes time and so leads to disruption in the short to medium term, although through a coordinated approach there is good potential to minimise issues.
- 6.7.4. With regards to the three variable sites, it is not clear that there is an opportunity to deliver a new health facility (this would certainly be an opportunity to explore were the assumption to alternatively be that 'Well End' would deliver as a larger strategic urban extension; also it is noted that the site is in proximity to a secondary school, as is also the case for nearby 'North Borehamwood'). There is also potentially a concern regarding higher growth from greenfield sites at Borehamwood serving to divert investment from town centre regeneration, but this is highly uncertain.
- 6.7.5. With regards to sites that are a constant across the scenarios, the IDP reports the potential to deliver new health centres, but there is a need for further work to confirm matters. Planning for healthcare is challenging because the NHS requires flexibility such that it can be difficult to be certain that land provided will ultimately be taken up. Also, it can be a case that the NHS supports larger scale new integrated health hubs, which require strategic planning in terms of location and site suitability.

- 6.7.6. Finally, it is important to note that a number of the constant urban extension options are well located in terms of accessing a town centre and/or a district centre, for example: 1) there is a considerable opportunity to the west of Borehamwood; 3) at Potters Bar one of the proposed sites is located in close proximity to the railway station; and 3) at Bushey one of the proposed sites is Council owned land located along the High Street and with good links to Watford.
- 6.7.7. Overall, there is an ‘uncertain’ appraisal conclusion given inherent uncertainties in respect of delivering health care facilities and town centre regeneration strategy, plus ongoing uncertainties regarding the robustness of the housing land supply.

6.8. Communities 3: Health

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
=	=	=	=	=	=	=

- 6.8.1. The Interim SA Report (2026) stated:

“... there are also many wider ways in which the Local Plan influences the determinants of good health. One key matter for consideration relates to strategic planning for green and blue infrastructure, both within and outside of development sites, and also the related matter of ensuring that sites are masterplanned and designed with good health as a priority objective. In this regard it is fair to say that a priority objective is simply adopting a Local Plan such that growth comes forward in a plan-led way, as opposed to the baseline situation whereby growth continues to come forward in a piecemeal fashion in the absence of an up-to-date Local Plan with issues arising and opportunities missed in respect of planning for health.”

- 6.8.2. Focusing on green and blue infrastructure, at the current stage there is broad support for the proposed submission approach (Scenario 1), including the new focus on coordinated strategic growth at Radlett and the adjusted proposal for a strategic urban extension to the west of Borehamwood.
- 6.8.3. With regards to the three variable sites: A) ‘North Bushey’ would deliver significant new areas of accessible greenspace; B) ‘North Borehamwood’ has good access to the countryside; and C) ‘Well End’ represents an opportunity to design-in high quality green / blue infrastructure, although the concern is that opportunities may not be fully realised, given the concept masterplan submitted by the site promoter and given a risk of piecemeal growth.⁴⁵
- 6.8.4. Further considerations are:
- Borehamwood – strategic growth to the west is supported in terms of very good access to the town centre, there is also a strategic green / blue infrastructure opportunity assuming the potential for coordinated growth across development sites, and one of the sites here that is held constant across the scenarios is set to deliver a relocated GP surgery.
 - Bushey – there is support for the ambitious proposal for a very large scale ‘intergenerational continuing care community’.
 - Radlett – land to the west and south of Radlett comprises relatively accessible and likely highly valued countryside, which represents both a constraint and an opportunity. The potential to deliver new strategic accessible open / green space to the south of Radlett might be explored, including noting the extent of woodland in this area.

⁴⁵ The Interim SA Report (2026) stated: “With regards to the option of a Well End strategic urban extension, under a higher growth scenario there would be excellent potential to deliver a district centre and plan strategically for green/blue infrastructure, including drawing upon topography / flood zones and a dense network of field boundaries and other landscape features.”

- Bowmans Cross – the site promoters vision includes, amongst other things: “... *new primary and secondary schools, health and social care services, community centres, shops, cafes and other amenities... many miles of new routes for walking, cycling and riding... and parks and green amenity spaces... sports pitches and a range of fitness trails would be provided within the parkland areas.*”

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

- 6.8.5. On balance, the scenarios are ranked on a par and neutral effects are predicted. As stated in the Interim SA Report (2026): “... *it is fair to say that a priority objective is simply adopting a Local Plan such that growth comes forward in a plan-led way, as opposed to the baseline situation whereby growth continues to come forward in a piecemeal fashion... with issues arising and opportunities missed in respect of planning for health... On balance neutral effects are predicted given the wide-ranging nature of the determinants of health, but at the next stage the aim should be to reach a positive conclusion including accounting for detailed site-specific policies.*”

6.9. Communities 4: Cohesion

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
 1	2	2	2	2	2	2

- 6.9.1. The Interim SA Report (2026) stated:

“... it is difficult to confidently and meaningfully differentiate between the growth scenarios. A key issue is an acknowledged local concern with large scale housing growth; however, on the other hand, A) the baseline is a situation whereby growth continues unabated under the presumption in favour of sustainable development (an essential component of the plan-led system under the NPPF, with the aim being to motivate local authorities to maintain an up-to-date local plan); and B) under the lower growth scenarios it could potentially prove challenging to progress the local plan as objectors might argue there is insufficient supply.”

- 6.9.2. At this stage it is considered reasonable to flag support for Scenario 1, recognising that this is the outcome of lengthy process of iterating the emerging draft local plan, and recognising that the three variable sites that feature across Scenarios 2 to 7 all generate community concerns (albeit this is likely partly due to all being the subject of current planning applications). This is notwithstanding that there remains a strong ‘communities’ argument for adopting a Local Plan with a robust housing land supply to expedite plan adoption and ensure that that the Council can maintain a rolling 5YHLS moving forward and therefore avoid ‘evidenced unmet need’.

- 6.9.3. It is difficult to confidently and meaningfully differentiate between the growth scenarios. A key issue is an acknowledged local concern with large scale housing growth; however, on the other hand, A) the baseline is a situation whereby growth continues unabated under the presumption in favour of sustainable development (an essential component of the plan-led system under the NPPF, with the aim being to motivate local authorities to maintain an up-to-date local plan); and B) under the lower growth scenarios it could potentially prove challenging to progress the local plan as objectors might argue there is insufficient supply (but this is uncertain ahead of further work to firm up supply).

6.9.4. Further considerations are:

- Borehamwood – there is a need for an ongoing focus on coordinated strategic growth to the west, including accounting for sensitivities relating to Elstree Village including in terms of increased traffic.
- Potters Bar – there are understood to be significant local community concerns with the option of a strategic urban extension to the south, likely partially reflecting the fact that this is a fairly prominent area of farmland that provides a visual setting to Potters Bar and perhaps contributes to something of a gateway from the south (the direction of London). However, a benefit of growth to the south relates to strong containment, whilst growth to the north must be carefully considered in order to avoid sprawl.
- Bushey – there is considered to be a good opportunity for comprehensive growth to the north and east such that, in turn, there will be good potential to maintain the landscape gap to Watford/Oxhey in perpetuity.
- Radlett – the following statement from the Interim SA Report (2026) still holds true: “... *through and subsequent to the current consultation there will be a need for further detailed consideration of how the emerging preferred sites can come together to deliver a coordinated approach to growth that maximises benefits and avoids issues, including the risk of future sprawl.*”
- Villages – there is a need for ongoing scrutiny of the proposed approach of supporting limited growth over-and-above commitments, including from a perspective of maintaining villages services/facilities (including primary schools) and overall vitality.
- Bowmans Cross – relates closely to London Colney and so there will be a need for ongoing close collaboration with St Albans District, most notably in transport terms.

6.9.5. Overall, there is support for Scenario 1 and neutral effects are predicted.

6.10. Economy and employment

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
=	=	=	=	=	=	=

- 6.10.1. Employment land needs would be provided for in full under Scenario 1 and none of the three variable omission sites that feature across the higher growth scenarios would deliver significant new employment land.
- 6.10.2. The one non-committed proposed employment allocation is HPBA13 at Potters Bar, which is a 6ha site within Hertsmere, but the cross boundary landholding with Enfield is approximately 11 ha in total. The site is located adjacent to the east of M25 Junction 24. Allocation represents a proactive approach, recognising the challenges in respect of industrial, storage and distribution land to serve London.
- 6.10.3. With regards to Bowmans Cross, the Interim SA Report (2026) stated: “... *there is understood to be a significant opportunity to deliver new employment land as part of a new settlement at Bowmans Cross. However, the site promoter’s emerging masterplan does not propose significant employment land, and so the Council is keen to explore options for higher growth, to include higher densities, to ensure that the scheme delivers a town centre and new employment land. As part of this, there is a need to caution against forecasting need for employment land on the basis of recent trends recognising that the new settlement would deliver over decades.*” It has not been possible to scrutinise the recent planning application, and so this may be a matter to explore further.

- 6.10.4. At Well End a comprehensive approach to growth in this area could potentially unlock / facilitate delivery of new strategic employment land to the south of Rowley Lane (north of Sky Studios planning permission); however, there are no clear proposals for a comprehensive strategic urban extension of this nature, nor is there a clear need to for additional strategic employment land.
- 6.10.5. Finally, whilst there is a case to be made for higher growth to deliver additional homes in support of a skilled local workforce, it is not clear that this is a significant consideration.
- 6.10.6. Overall, the scenarios perform on a par and 'moderate or uncertain' positive effects are predicted. There is a case for predicting significant positive effects, but there is potentially a degree of uncertainty around unmet needs from London.

6.11. Historic environment

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
2	1	2	2	2	2	2

- 6.11.1. Constraints are widespread but concerns with growth are limited, including as understood from recent Historic Impact Assessments (HIAs).
- 6.11.2. High urban growth generates limited concerns, given that Borehamwood and Potters Bar are mainly 20th century towns (although Historic England flagged some issues through their consultation response); and at most of the proposed greenfield urban extensions under Scenario 1 there is notably low constraint or clearly good potential to avoid/minimise impacts through masterplanning.
- 6.11.3. A key site of note is the proposed urban extension to the west of Borehamwood, which would involve significant encroachment towards Aldenham House Registered Park and Garden (Grade 2) and the Elstree Village conservation area, and where mitigation could be challenging (including noting other nearby sites, and uncertainties regarding how to masterplan the site to achieve a comprehensive scheme, noting a pending planning application within the site).
- 6.11.4. With regards to the three variable sites, all are subject to limited constraint, with 'North Borehamwood' particularly standing out in this regard. At 'North Bushey' there are heritage assets nearby within the sensitive gap between Bushey and North Bushey, but there appears to be good potential for mitigation, to include a large new area of accessible greenspace that would make good use of an area of former parkland. At 'Well End' there are limited concerns on the assumption of a 1,200 home scheme, but the risk is an expanded scheme that encroaches towards a landscape associated with a number of listed buildings and historic lanes, and a concern could be problematic 'rat running' through village conservation areas.
- 6.11.5. Further considerations are:
- Potters Bar – there are no designated historic environment assets in proximity to the primary proposed urban extension to the south. However, there are some adjacent low density residential areas with a degree of early to mid-20th century character. Finally, the golf course site (a constant across the growth scenarios) is adjacent to a conservation area there are only two listed buildings here (not adjacent to the site).
 - Bushey – it is only the site to the west that appears to be associated with significant historic environment constraint, given a close association with the historic high street.
 - Radlett – there are important clusters / densities of historic environment assets across the rural landscape to the west of Radlett, hence there is a need to give consideration to ensuring a comprehensive approach with a long term perspective, as discussed.

- Villages – all three of the larger villages are subject to significant historic environment constraint, as discussed in Section 5.4, hence there is support for limiting growth. At South Mimms the new proposal to support 50 homes supply can be considered in the context of the following statement from the Interim SA Report (2026): *“At South Mimms the potential for growth that respects historic character, including the setting of the Grade I listed church, can be envisaged but this is likely a matter better considered in the future once there is more certainty in respect of Bowmans Cross.”*
- Bowmans Cross – there is limited historic environment constraint, on the assumption that growth would not encroach towards Grade I listed Tyttenhanger House. Historic England did not comment on Bowmans Cross through the consultation in 2024.

6.12. Homes

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
6	5	4	3	3	2	1

- 6.12.1. As discussed, there is a case for higher growth with a view to boosting the housing requirement and/or ensuring a more robust supply headroom over-and-above the requirement, particularly in the crucial early years of the plan period.
- 6.12.2. With regards to the supply trajectory under Scenario 1, whilst this is the outcome of detailed work to consider the capacity and delivery trajectory of sites, there do remain uncertainties regarding a number of challenging urban sites, including some that are relied upon to contribute to 5YHLS in the earlier years of the plan period. Also, delivery of 2,500 homes at Bowmans Cross is somewhat uncertain.
- 6.12.3. It is also important to acknowledge that urban regeneration sites often struggle to deliver affordable housing (as discussed in the Viability Study, 2026) and, indeed, it is often the case that urban / brownfield sites are unable to viably deliver any affordable housing (at least at the current time, acknowledging that development viability could well improve over the plan period to 2043).
- 6.12.4. With regards to the three variable sites, all are greenfield sites without any apparent abnormal development costs, such that they could likely deliver the full policy quote of affordable housing (certain of the sites are proposing 50%). Furthermore, all are currently the subject of pending planning applications (in whole or in part), which is strongly suggestive of good potential to deliver in the crucial early years of the plan.
- 6.12.5. Overall, the highest growth scenarios are very strongly supported as there would be the potential to set the housing requirement modestly above LHN and with a robust supply headroom, including in the earlier years of the plan period (a stepped requirement could be considered to ensure this, involving conservative assumptions regarding the timing of urban supply). A housing requirement set above LHN would represent a positive response to unmet housing need in the sub-region and/or a positive response to affordable housing needs (under Scenario 1 around 70% of housing would need to be 'affordable' in order for needs to be met in full, which is not achievable).
- 6.12.6. Under Scenario 1, whilst supply over the plan period matches the housing requirement (indeed exceeds it by 2%), and there could be a 5YHLS at adoption (noting the potential for additional supply from pending planning applications), there remain uncertainties in both regards, due to reliance on challenging urban sites. One notable quote from the Viability Study (2026) is: *“... the delivery of the Tesco / Canada life site is likely to be challenging – like the other flatted typologies... it is recommended that the Council engages further with the promoters of the potential strategic sites... and only includes these sites in the new Local Plan if they can be demonstrated to be viable.”*

- 6.12.7. Finally, there are significant concerns regarding the lack of identified sites to provide for Gypsy and Traveller accommodation needs. Whilst there is policy support for regularisation, intensification and expansion of existing sites, and the intention is to work with the promoters of strategic urban extensions to explore the possibility of integrating a Gypsy and Traveller pitch as part of masterplanning work, there is a clear need to identify supply at the local plan stage, as far as possible. Even where strategic urban extensions are required to deliver a Gypsy and Traveller site through a local plan there can still be a risk of the site not transpiring in practice (or delivery being delayed until the final phases of the strategic urban extension. There would appear to be a clear case for Bowmans Cross delivering a Gypsy and Traveller site. Also, 'Well End' is a good example of a strategic urban extension that could be suited to delivering a Gypsy and Traveller site, e.g. to contribute around 15 pitches to the overall identified need for between 123 and 132 pitches over the plan period.
- 6.12.8. In conclusion, the order of preference broadly aligns with growth quantum, but also factors-in the timing of delivery. It is acknowledged that there is a case for reaching less positive conclusions given Gypsy and Traveller accommodation issues.

6.13. Landscape

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
2	2		2	2	2	2

- 6.13.1. The Interim SA Report stated:

"... whilst there are no designated landscapes... there is a widespread concern regarding creep of the London suburbs into Hertfordshire, generally loss of open countryside that is highly appreciated and loss of settlement separation. Concerns can be flagged at all settlements, but the appraisal aims to reflect a view that... Bowmans Cross represents a means of delivering growth in line with landscape objectives."

- 6.13.2. At the current stage there is new evidence in the form of a Landscape Impact Assessment (LIA, 2026), which identifies that around half of the proposed greenfield allocations under Scenario 1 have 'moderate' sensitivity with the others having 'moderate-high' sensitivity.
- 6.13.3. With regards to the three variable sites: A) 'North Borehamwood' is associated with rising land but potentially has limited sensitivity on the assumption of a well-contained scheme (the LIA concludes 'moderate-high' sensitivity for a much larger parcel that stretches all across the entire northern edge of Borehamwood); B) 'North Bushey' has 'moderate' sensitivity, and whilst this is a sensitive Green Belt gap there appears to be good potential to secure a long-term defensible northern urban edge to Bushey; and C) 'Well End' has 'moderate' sensitivity but, and as discussed, there is a concern regarding sub-optimal development creep / sprawl.
- 6.13.4. Further considerations are:
- Potters Bar – as discussed, the primary proposed urban extension to the south is well contained by the M25, but it is recognised that the site to the south likely has a degree of sensitivity as a buffer to the M25 and London and because it contributes to setting of the town as experienced from key directions of travel.
 - Bushey – there is broadly support for focusing growth to the east and north, including given the potential to protect the landscape gap to Watford/Oxhey in perpetuity. However, comprehensive growth to the east is a matter for ongoing consideration, given limited landscape sensitivity and good containment by the M1. To the north, the Interim SA Report referred to the potential to 'complete' expansion of the town.

- Radlett – as discussed, there is a need for further work to consider how the proposed allocations will deliver comprehensive growth in combination that minimises the risk of future sprawl, given the Radlett's association with the river and transport corridor and given a sensitive landscape to the west and south west. To the west there is a concern that the western extent of the proposed allocation does will not be well-contained.
- Bowmans Cross – represents a means of delivering growth in line with landscape objectives. The site comprises a significant area of degraded land, and there is good containment by the M25 to the south, rising land / woodlands / heritage assets to the east and the River Colne corridor to the north, but there does remain a need for ongoing work to confirm the extent of the site with a long term perspective.
- Villages – there is support for the low growth from a landscape perspective, perhaps most notably at Elstree Village where there is a need to maintain its distinct position in the landscape, in the context of nearby Borehamwood and the London suburbs.

6.13.5. In conclusion, it is considered reasonable to highlight 'North Bushey' as a site subject to relatively limited landscape constraint, and where there is good potential for containment. With regards to significant effects, neutral effects are predicted across the scenarios, but there is a need for ongoing consideration of the strategy in respect of expansion of Radlett to the west and south and Borehamwood to the west.

6.14. Soils and other resources

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
=	=	=	=	=	=	=

- 6.14.1. Agricultural land quality is not particularly high in the Borough although there is a notable concentration of 'best and most versatile' agricultural land in the vicinity of North Bushey and Radlett, including a band of grade 2 quality land to the south of Radlett that intersects one of the proposed urban extensions that is a constant across the scenarios.
- 6.14.2. All three of the variable sites that feature across Scenarios 2 to 7 likely comprise grade 3b quality land (not best and most versatile), although if 'Well End' were to expand east of Well End Road then this would involve encroaching into an area associated with grade 3a quality land.
- 6.14.3. Another point to note is support for a focus on urban growth and also several greenfield sites comprising degraded land (most notably Bowmans Cross) or golf courses.⁴⁶ Finally, minerals and waste planning is a significant factor in parts of the Borough including Bowmans Cross (with potential implications for timing).
- 6.14.4. Looking across the wider sub-region, neighbouring parts of South West Herts are associated with more significant pockets of grade 2 land, and then there is very extensive grade 2 land across North East Herts and South West Essex.

⁴⁶ With regards to Bowmans Cross, whilst much of the land is degraded there are areas in arable use, and this includes grade 2 quality land and potentially some that is grade 1 quality. The new agricultural land quality dataset shows a significant area of grade 1 quality land (i.e. land of the highest quality nationally) in the vicinity of London Colney.

6.15. Transport

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
?	?	?	?	?	?	?

6.15.1. The Interim SA Report (2026) stated:

“... the Borough is overall very well connected and there are major opportunities to deliver growth in proximity to a well-connected railway stations, along bus corridors and along priority routes identified in the Draft Local Cycling and Walking Infrastructure Plan (LCWIP, 2026). Also, there are significant opportunities to deliver large-scale strategic sites that can deliver strategic infrastructure upgrades and will benefit from a high degree of trip internalisation. However, the emerging preferred growth strategy is a major step-change on that previously consulted-on in 2024, such that it will be crucial to work closely with HCC, National Highways and others ahead of plan finalisation, including informed by transport modelling. Ahead of plan finalisation there is a need for further work to ensure not only that issues are avoided but also opportunities are realised, including in terms of minimising the need to travel, supporting modal shift and overall ensuring that the growth strategy for the Borough aligns with ‘vision-led’ transport planning principles.”

6.15.2. Transport work remains ongoing at the time of writing, such that there is a need to conclude considerable uncertainty and, taking a precautionary approach, to flag a ‘moderate or uncertain’ negative effect across the scenarios.

6.15.3. The three variable sites are in reasonably accessible and well-connected locations, but there is a need to consider the cumulative effects of growth for road traffic and, in turn, the ability to support high quality bus services and safe walking and cycling. At ‘Well End’ there is a clear need to ensure a comprehensive approach to growth that realises opportunities to deliver new and upgraded transport infrastructure, to avoid problematic traffic congestion, support modal shift away from the private car and ultimately to ensure growth in line with ‘vision-led’ transport planning principles.⁴⁷

6.15.4. Further considerations are:

- Borehamwood – whilst there is a clear transport case for a strategic urban extension to the south west, achieving access is challenging (as discussed in Section 5.4) and there are also sensitivities here relating to traffic generation including traffic through Elstree Village. There is a need to confirm whether the northern extent of the proposed allocation would require access from Watling Street, which would have implications for the ability to easily access Borehamwood.

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

- Potters Bar – all of the proposed allocations perform well in terms of accessing the town centre and railway station, as well as existing bus services, plus there are transport upgrade options to explore including informed by the Draft LCWIP (2025). The golf course site is strongly supported in transport terms.

⁴⁷ The Interim SA Report (2026) stated: “A strategic urban extension to the north east (Well End) would be much more distant from the town centre and train station, and there could be challenges in respect of capacity at the nearby A1(M) junction, but strategic employment land is adjacent, as is an existing secondary school, and there will likely be transport solutions given the scale of growth under consideration.”

- Bushey – as discussed in Section 5.4, the one site that is neither permitted nor the subject of a live planning application is very strongly supported in transport terms, namely the proposed allocation to the west. Sites to the east are least well-connected, and there is a need for ongoing consideration of the in-combination impacts of growth in this area, including noting the employment land allocations (both committed).
- Radlett – the Interim SA Report (2026) stated: “... the two western-most emerging preferred sites will require careful consideration in terms of ensuring good links to the centre of Radlett and the railway station, and consideration should be given to enhancing links west towards Bushey / Watford. The site to the south is in relative proximity to the centre of Radlett, but it is noted that there is a single proposed point of access onto Watling Street, and there is a need to consider in combination effects with potential growth west of Borehamwood.” There is support for the new proposal not to take forward the previous ‘candidate site’ directly to the west of the town as it is not very well linked to the town centre, although a primary school is adjacent.
- Bowmans Cross – there are nearby links onto the strategic road network, but further work is needed to confirm necessary upgrades, including from a timing / phasing perspective (the ‘trigger points’ for upgrades are understood to be key). As stated in the Interim SA Report (2026): “As part of ongoing work there is a need to: A) ensure that the emerging vision includes a focus on a comprehensive scheme with a high degree of trip internalisation; B) explore options for ‘sustainable transport’ links to London Colney, St Albans, Hatfield and Potters Bar; and C) recognise that a new settlement would come forward over a period of decades such that there is a need to plan for future mobility including driverless cars.”
- Villages – as discussed, whilst there is a clear case for concluding that a low growth strategy aligns with vision led transport planning principles, there is also a need to acknowledge that there can be a transport case for targeted growth at villages.

6.16. Water

Scenario 1 PO	Scenario 2 Plus N. B'wood	Scenario 3 Plus N. Bushey	Scenario 4 Plus Well End	Scenario 5 Plus N. B'wood and N. Bushey	Scenario 6 Plus N. B'wood and Well End	Scenario 7 Plus N. Bushey and Well End
 1	2	3	4	5	6	7

6.16.1. The Interim SA Report stated:

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

- 6.16.2. At the time of writing a Water Cycle Study (WCS) Scoping Study has been completed that does flag concerns regarding capacity at Maple Lodge STW, including having factored in consultation responses. It also highlights that the proposed level of growth is in excess of that anticipated by the water company when preparing its Water Resource Management Plan (WRMP), which deals with the supply of water, but it is understood that there are no major concerns regarding the supply of water over the plan period (including from a perspective of avoiding low water levels impacting the water environment). A final WCS is in preparation at the time of writing, and it may be that through detailed investigation it can be determined that there is capacity at Maple Lodge STW to accommodate the proposed housing land supply trajectory. However, on balance, a significant concern is flagged for higher growth scenarios.

6.17. Appraisal summary

6.17.1. Table 6.1 presents a summary of the appraisal above. The table aims to **1)** rank the scenarios in order of performance (with a star indicating best performing and “=” used where it is not possible to differentiate with confidence, and “?” used where there is fundamental uncertainty at this stage); and then **2)** categorise performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green**.⁴⁸

6.17.2. Also, see the non-technical summary for a summary discussion of the appraisal.

Table 6.1: Growth scenarios summary appraisal

	Scenario 1 -	Scenario 2 N. B'wood	Scenario 3 N. Bushey	Scenario 4 Well End	Scenario 5 N. B'wood N. Bushey	Scenario 6 N. B'wood Well End	Scenario 7 N. Bushey Well End
Higher growth at...							
Air quality	=	=	=	=	=	=	=
Biodiversity	★1	★1	2	★1	2	★1	2
Climate change adaptation	=	=	=	=	=	=	=
Climate change mitigation	=	=	=	=	=	=	=
Communities 1: Education	2	3	2	2	2	2	★1
Communities 2: Services	?	?	?	?	?	?	?
Communities 3: Health	=	=	=	=	=	=	=
Communities 4: Cohesion	★1	2	2	2	2	2	2
Economy and employment	=	=	=	=	=	=	=
Historic environment	2	★1	2	2	2	2	2
Homes	6	5	4	3	3	2	★1
Landscape	2	2	★1	2	2	2	2
Soils / resources	=	=	=	=	=	=	=
Transport	?	?	?	?	?	?	?
Water	★1	2	3	4	5	6	7

⁴⁸ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

7. The preferred growth scenario

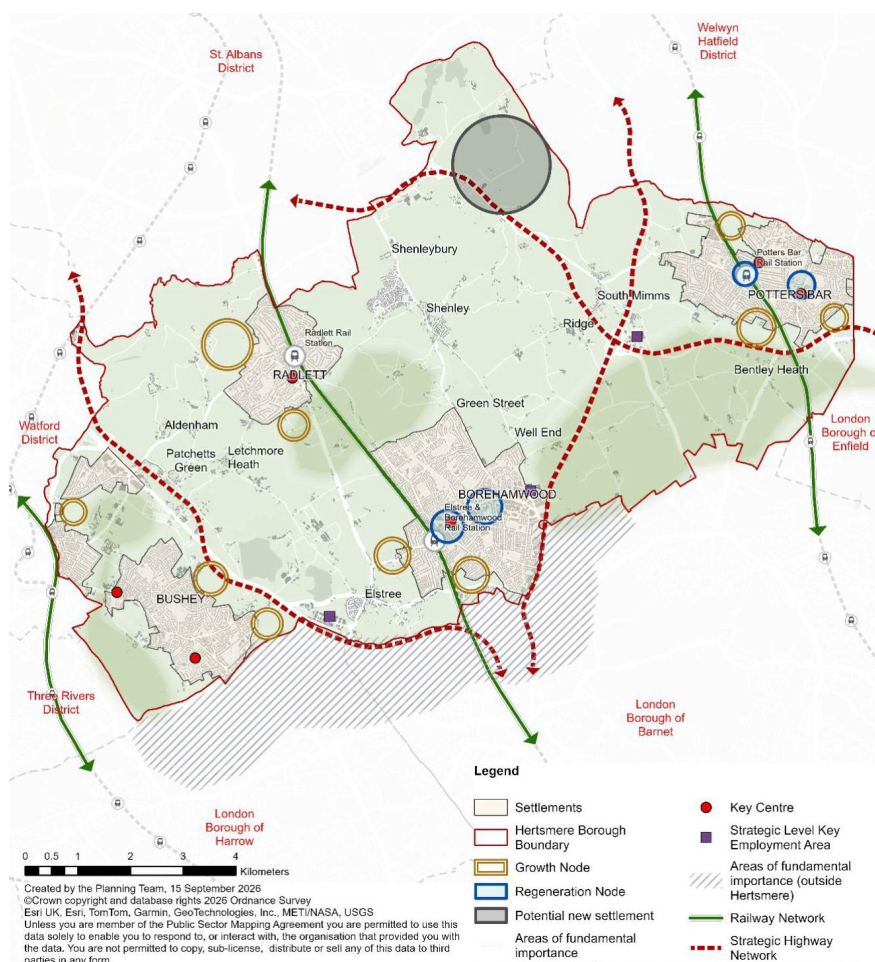
Introduction

- 7.1.1. The following text was **prepared by HBC officers** in response to the appraisal above (by AECOM). The text below does not amount to an appraisal.

Reasons for supporting Growth Scenario 1

- 7.1.2. Scenario 1 is taken forward as the basis for Proposed Submission Local Plan that is currently published under Regulation 19. The appraisal shows it to perform suitably well, such that officers believe it to be: *“Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”* (this being one of the four tests of soundness set out at paragraph 36 of the NPPF, 2024).
- 7.1.3. It is acknowledged that there is a ‘homes’ argument for supporting certain of the alternative scenarios, but under Scenario 1 the housing requirement would be set at local housing need (LHN), including from the start of the plan period, and the identified housing supply should be sufficient to ensure a rolling five year housing land supply (subject to ongoing work in the usual way). There is no clear case to be made for a housing requirement set above LHN, e.g. in the absence of clear evidence that Hertsmere should accommodate unmet housing need from Three Rivers. With regards to affordable housing, there is set to be a major step change in delivery over the plan period, and it is difficult to conclude a clear case for a housing requirement set above LHN in order to make marginally higher provision for affordable housing. The clearest case for higher growth is in respect of ensuring a more robust housing land supply, i.e. with a view to boosting certainty regarding maintenance of a 5YHLS.

Figure 7.1: Growth scenario 1 (the proposed submission key diagram)



Part 2: SA findings at this stage?

8. Introduction to Part 2

- 8.1.1. This part of the report presents an appraisal of the Proposed Submission Local Plan as a whole under the SA framework (i.e. under the same set of topic headings used to structure the appraisal in Section 6). The appraisal essentially recaps the appraisal of growth scenario 1 and additionally considers the policies presented within the plan, including with a focus on site-specific policies which are of considerable importance.
- 8.1.2. Under each topic heading the aim is to reach a conclusion on the 'significant effects' of the Local Plan as a whole, which can involve confirming the conclusion reached for growth scenario 1, as appraised in Section 6. With regards to methodology, account is taken of the baseline situation (a significant effect is an effect on the baseline, which is not a static situation but one whereby growth would come forward without a Local Plan), and various potential effect characteristics. For example, there is a need to consider short and long term effects, direct and indirect effects and the cumulative effects of the Local Plan in combination with other policies and plans.
- 8.1.3. With regards to wider policies, there is a need to acknowledge limited potential to generate significant effects. As part of this, there is a need to note that under the new NPPF (2026): A) policies that do align with the NPPF are given very limited weight; and B) there is a new proposed universal / default 'yes' in respect of development within settlements. Key policy choices relate to those with cost / viability implications, in that there is a need to balance competing policy objectives within viability parameters.

9. The Proposed Submission Plan

9.1. Introduction

- 9.1.1. This section presents an appraisal of the proposed submission version of the Local Plan under the SA framework.

9.2. Air quality

- 9.2.1. The appraisal in Section 6 predicts a neutral effect, as whilst there are transport challenges these do not necessarily translate into air quality issues.
- 9.2.2. Air quality is referenced across numerous Borough-wide development management (DM) policies, which are broadly nationally standard policies as opposed to reflecting particular local issues. Air quality is also briefly referenced, alongside noise pollution, for most of the proposed allocations adjacent to a motorway, although this is not the case for the new proposed allocation (relative to the previous Regulation 18 stage) to the east of Bushey, which might be addressed. Where sites are constrained by an adjacent motorway there is a need for site specific policy to provide confidence that the site can be brought forward in a way that avoids or minimises the issue, as far as possible.
- 9.2.3. In conclusion, a **neutral effect** is predicted for the Local Plan as a whole.

9.3. Biodiversity

- 9.3.1. The appraisal in Section 6 predicts a neutral effect, albeit certain of the non-committed proposed allocations are subject to a degree of constraint, notably Bowmans Cross (but there is excellent potential for avoidance and mitigation, as well as targeted enhancements) and sites at Bushey (accounting for new proposed higher densities).
- 9.3.2. Focusing on Bowmans Cross, the requirement is as follows:

“[Development] will establish a connected, multi-functional green and blue infrastructure network incorporating strategic open space, parks, sport and play provision, ecological corridors, woodland, hedgerows, ponds, sustainable drainage and public rights of way. Development must protect and, where appropriate, enhance Redwell Wood SSSI, Colney Heath Local Nature Reserve, important woodland, trees, hedgerows, ponds, habitats and protected species, and deliver biodiversity net gain in accordance with the relevant Local Plan policies and legislation.”

- 9.3.3. Given the scale of the proposal there would ideally be additional spatial specificity, with a view to generating confidence that the site can viably come forward in a way that avoids and mitigates impacts and realises targeted opportunities in line with the LNRS.
- 9.3.4. Finally, the proposal is to require 20% biodiversity net gain, which is clearly strongly supported from a biodiversity perspective. However, there is a need to recognise that this could be challenging at some sites, without having to compromise on wider objectives, given viability parameters. Also, achieving 20% biodiversity net gain can require offsite enhancements, which can be challenging to deliver, and there is a need to avoid a situation whereby site delivery is unexpectedly delayed due to this challenge.
- 9.3.5. In conclusion, a **neutral effect** is predicted for the Local Plan as a whole.

9.4. Climate change adaptation

- 9.4.1. The appraisal in Section 6 predicts a ‘moderate or uncertain’ negative effect, given a degree of flood risk affecting sites, particularly urban sites.
- 9.4.2. With regards to site specific policies, there are no specific requirements in terms of areas of sites that should be left undeveloped to avoid flood risk, however, there are numerous references to the need for future masterplanning to account for flood risk. The following is an example of one of the more spatially specific policies:

“The culverted Borehamwood Brook, flood risk and drainage constraints must inform the masterplan from the outset. The masterplan must investigate opportunities to de-culvert, naturalise or otherwise enhance the watercourse where technically feasible and environmentally beneficial. The masterplan should explore opportunities for Borehamwood Brook to become a positive component of the public realm and blue-green infrastructure network rather than remaining solely as buried infrastructure.”

- 9.4.3. It is understood that flood zones have factored into work to consider site capacities, and avoiding flood risk zones is a matter that can typically be sufficiently addressed at the planning application stage in line with standard practice. However, there could be merit to setting out in more detail what is required for the more constrained sites, with a view to ensuring that sites can be successfully and viably delivered without having to compromise on wider objectives.
- 9.4.4. In conclusion, a **‘moderate or uncertain’ negative effect** is predicted.

9.5. Climate change mitigation

- 9.5.1. The appraisal in Section 6 predicts a neutral effect, recognising that there should be good potential to deliver net zero developments, including with a view to minimising peak strains on the electricity grid.
- 9.5.2. With regards to policies, the key point to note is that the proposal is to require net zero developments. However, given viability parameters, competing policy objectives and uncertainties regarding infrastructure costs associated with some sites, it is important to recognise that it may not always be possible to deliver net zero developments in practice (such that there is a need to avoid false comfort).

- 9.5.3. Also, the specific nature of the net zero development policy warrants ongoing scrutiny, with a view to ensuring an approach that fully aligns with the energy hierarchy, i.e. a need to minimise energy use in the first instance as far as possible, before then generating renewable energy onsite, and then relying on offsetting only as a last resort. The Interim SA Report (2026) discussed a need to ensure that net zero is: “A) *carefully defined (including accounting for the question of operational emissions versus ‘whole lifecycle’ emissions including ‘embodied’ emissions in buildings and infrastructure); B) measured using an industry best practice metric (i.e. the Buildings Regulations metric versus the ‘energy based’ metric favoured by most industry specialists); and C) achieved in line with the energy hierarchy (including with offsetting only as a last resort).*”
- 9.5.4. In conclusion, a **neutral effect** is predicted for the Local Plan as a whole.

9.6. Communities 1: Education

- 9.6.1. The appraisal in Section 6 predicts a neutral effect, as there is a need for further work to confirm which of the non-committed proposed allocations can deliver a new school, with this most notably the case for the proposed strategic urban extension west of Radlett. Focusing on this site, the site specific requirement is as follows:
- “Developers will work collaboratively with the education authority (Hertfordshire County Council) to determine the requirements for school place provision arising from the delivery of the strategic urban extension. This includes any on-site provision that arises from the strategic urban extension. The developers will work with the education authority to ensure that any agreed on-site provision is delivered in a timely manner to ensure that Radlett remains a sustainable and walkable town.”*
- 9.6.2. There is a need to recognise that if the objective is to deliver a secondary school this could have significant implications for masterplanning and delivery of the site
- 9.6.3. In conclusion, a **neutral effect** is predicted for the Local Plan as a whole.

9.7. Communities 2: Services

- 9.7.1. The appraisal in Section 6 predicts a neutral effect. Whilst there are positive aspects to the plan, including from a perspective of needing to prevent ongoing piecemeal growth from speculative applications, there are inherent uncertainties in respect of delivering health care facilities and town centre regeneration strategy, plus ongoing uncertainties regarding the robustness of the housing land supply.
- 9.7.2. Focusing on the proposed strategic urban extension to the west of Radlett, as the largest proposed allocation for which there is not yet a planning application, a headline requirement is: *“It will be comprised of comprehensive mixed-use developments with compatible residential, commercial, community and main town centre uses.”* However, there is little or no detail regarding precisely what will be delivered and where within the site. As such, it is difficult to be confident that planning gain will be maximised.
- 9.7.3. In conclusion, a **neutral effect** is predicted for the Local Plan as a whole.

9.8. Communities 3: Health

- 9.8.1. The appraisal in Section 6 predicts a neutral effect. Many of the sites perform well in terms of access to green infrastructure and there is clearly an emphasis on integrating green infrastructure and open space. However, again site specific requirements are high level at this stage.
- 9.8.2. Finally, it is noted that there is a requirement for all major development proposals to submit a Health Impact Assessment (HIA). This is understood to be a requirement with limited implications for development viability.
- 9.8.3. In conclusion, a **neutral effect** is predicted for the Local Plan as a whole.

9.9. Communities 4: Cohesion

- 9.9.1. The appraisal in Section 6 predicts a neutral effect. Whilst there remain community concerns with the proposed growth strategy, there is a clear need to adopt a Local Plan, and the plan has been developed iteratively accounting for several consultations.
- 9.9.2. Again, moving forward a key recommendation is to consider adding detail / specificity to site specific policies, with a view to generating confidence that sites can come viably come forward on the timescales anticipated whilst delivering on key objectives.
- 9.9.3. In conclusion, a **neutral effect** is predicted for the Local Plan as a whole.

9.10. Economy and employment

- 9.10.1. The appraisal in Section 6 predicts a 'moderate or uncertain' positive effect, because the proposal is to provide for employment land needs in full. However, there is a need for further work to confirm what can be achieved at Bowmans Cross, where the site specific policy does not set out what is required in terms of employment land / floorspace.
- 9.10.2. With regards to wider policies, there is strong support for the proposed policy framework, including in terms of protecting and intensifying existing employment sites.
- 9.10.3. Also, there is an important requirement as follows: *"Major development proposals must make provision for workplace training in Hertsmere. A financial contribution will be required using the formula set out in... This will be secured by conditions or planning contributions and used to support the Council's local labour scheme and associated projects."* This is a requirement with development viability implications, albeit modest.
- 9.10.4. In conclusion, a **'moderate or uncertain' positive effect** is predicted.

9.11. Historic environment

- 9.11.1. The appraisal in Section 6 predicts a neutral effect. Numerous sites are subject to a degree of constraint, but these constraints feature prominently within site-specific policies. The following is one example:

"Development must respond positively to heritage assets including the Grade II listed Duty Stone on the administrative boundary to the northwest of the former Golf Course, and listed buildings at 23 The Avenue and Tiverton, Darkes Lane as well as the Darkes Lane West Conservation Area which directly abuts the north-eastern site boundary. Proposals must address impacts on the significance of these heritage assets and their setting, including the impact on views from within the Conservation Area. Focus should be given to enhancing and revealing the setting and significance of the Duty Stone, which is currently visible from the site, but is not readily accessible being hidden on Network Rail land close to the railway line."
- 9.11.2. The focus on historic environment constraints (and opportunities) within site-specific policies is supported, although there remains scope for added spatial specificity (potentially to include concept masterplans) with a view to ensuring that sites can be viably delivered without having to compromise on historic environment objectives.
- 9.11.3. In conclusion, a **neutral effect** is predicted.

9.12. Homes

- 9.12.1. The appraisal in Section 6 predicts a neutral effect, recognising that whilst the proposal is to set the housing requirement at LHN, including from the outset of the plan period (i.e. the aim is to avoid a stepped requirement), there remains a degree of uncertainty regarding whether the identified supply is sufficiently robust to enable this in practice.

- 9.12.2. Also, a key issue is the lack of identified supply in respect of Gypsy and Traveller accommodation needs, as discussed in Section 6.⁴⁹
- 9.12.3. Furthermore, the reliance on urban supply will limit the potential for sites to deliver affordable housing (AH), with it not being uncommon for challenging urban sites to deliver nil AH on viability grounds. For Green Belt sites the requirement is for 40% AH, to include 75% social rented housing, but there is a need for ongoing consideration of whether this requirement could potentially be increased by relaxing other requirements, for example requirements for net zero development and 20% biodiversity net gain. Also, it is important to say that the high-level site specific policies, and residual uncertainties in respect of transport infrastructure costs associated with some sites, leads to a degree of uncertainty regarding the potential to deliver on AH policy requirements in practice.
- 9.12.4. Finally, in respect of site specific policies there is scope to add specificity in respect of requirements for specialist housing. One of the site specific requirements is as follows:
- “Applicants will undertake early engagement and work collaboratively with Hertfordshire County Council to explore, identify and agree the potential for the delivery of a new specialised residential provision. This may include the on-site delivery of new provision for children; older persons (to potentially include extra care accommodation); and adults with learning, autism and physical disabilities.”*
- 9.12.5. In conclusion, a **neutral effect** is predicted.

9.13. Landscape

- 9.13.1. The appraisal in Section 6 predicts a neutral effect, recognising that there is an urgent need to adopt a local plan there are some concerns associated with certain of the non-committed proposed allocations, notably to the west of Radlett and west of Borehamwood. At both sites the site specific policies set out the need for new defensible Green Belt boundaries, but there is uncertainty regarding the potential to achieve this in practice, ahead of further work on site masterplanning and further work on what the sites need to deliver in terms of onsite uses and infrastructure.
- 9.13.2. Finally, it is noted that the term ‘design-led’ appears 110 times within the plan, but ideally there would be further design-led work at the local plan stage.
- 9.13.3. In conclusion, a **neutral effect** is predicted.

9.14. Soils and other resources

- 9.14.1. The appraisal in Section 6 predicts a neutral effect as there will be limited loss of best and most versatile agricultural land.
- 9.14.2. Focusing on Bowmans Cross, the following is a notable site-specific requirement: *“The Council, the relevant waste authority and developers will work together to resolve any outstanding matters relating to on-site waste facilities. Developers must work positively with the Council and waste authority to identify appropriate provision that meets the needs of the new settlement.”* Ideally there will be a need for further clarity ahead of plan finalisation, with a view to confidence that the site can deliver 2,500 homes within the plan period and in line with the current assumed delivery trajectory.
- 9.14.3. In conclusion, a **neutral effect** is predicted.

⁴⁹ The Interim SA Report (2026) also stated: *“Providing for Gypsy and Traveller accommodation needs is very important (e.g. see an RTPI report [here](#)) but invariably challenging and so this is a key matter for further consideration. It can be noted that St Albans have recently undertaken a significant exercise to identify existing sites with the potential for regularisation, intensification and extension, recognising that existing needs are often site-specific, and because of a paucity of suitable options for new sites. There will likely also be a need for further work to consider which of the strategic site options (urban extensions and Bowmans Cross) are potentially suited to delivering a Gypsy and Traveller site; however, this can result in delays in providing for needs and introduce a degree of delivery risk.”*

9.15. Transport

- 9.15.1. The appraisal in predicts a ‘moderate or uncertain’ negative effect, as whilst there are many positive aspects of the proposed strategy, there are also residual risks and uncertainties, including ahead of further work to consider transport impacts and strategy, and further work to establish specific requirements for certain key sites.
- 9.15.2. Bowmans Cross is clearly a key site, but the proposed urban extension west of Borehamwood is also of note as a site where there is a pending planning application for part of the site but where the site specific policy requires:
- “Landowners should work together to ensure that a suitable access point servicing the whole site can be provided off Allum Lane and works in tandem with active travel infrastructure.”*
- 9.15.3. In conclusion, a **‘moderate or uncertain negative effect’** is predicted.

9.16. Water

- 9.16.1. The appraisal in Section 6 predicts a moderate or uncertain negative effect as there are some likely challenges in respect of sewage treatment works capacity.
- 9.16.2. With regards to policies, a key point to note is Policy SD8, which requires only the nationally standard approach to water efficiency, specifically 100 litres per person per day. It is very common for local plans to require higher standards of efficiency, with a view to minimising strain on water supply and wastewater infrastructure. However, there are viability implications (albeit fairly modest), such a more stringent requirement could necessitate compromising on other policy objectives.
- 9.16.3. In conclusion, a **‘moderate or uncertain negative effect’** is predicted.

9.17. Appraisal conclusion

- 9.17.1. The appraisal findings for the Local Plan as a whole are as per those reached for Scenario 1 in Section 6, namely:
- Moderate or uncertain positive effects – under one topic (employment)
 - Neutral effects – under 11 topics
 - Moderate or uncertain negative effects – under three topics (flood risk, homes, water)
- 9.17.2. Tensions with sustainability objectives can be explored further as part of plan finalisation post submission (i.e. as part of the examination in public), including informed by Regulation 19 representations and additional technical evidence, including around infrastructure requirements. A number of recommendations are made, but it is acknowledged that actioning recommendations to improve the performance of the plan in terms of one sustainability objective can have a bearing on the potential to deliver on other objectives, including given viability parameters.
- 9.17.3. Moving forward, there is a need to scrutinise proposed policy requirements in light of the Viability Study in terms of: A) the balance struck between competing policy priorities within viability parameters; B) ensuring that the cumulative burden of DM policy requirements does not risk impacting site deliverability; and C) ensuring that DM policies do not lead to false comfort, including regarding affordable housing, biodiversity net gain, net zero development and funding for infrastructure from CIL and S106. Compromises can and often are made at the planning application stage on viability grounds, plus there is the context of the new NPPF (2026) in terms of ‘national development management policies’ and a ‘default yes’ / ‘universal tilt’ in urban areas.

- 9.17.4. Overall, whilst there is broad support for the suite of borough-wide development management (DM) policies, which have been developed iteratively via consultation and informed by a range of detailed workstreams, and there is also support for the town-specific policies (particularly in respect of town centre regeneration in Borehamwood and Potters Bar), an issue is that the site-specific policies are somewhat high level.
- 9.17.5. Further work could be undertaken to prepare concept masterplans for select key allocations, and to add detail to policy requirements aimed at ensuring that the sites are allocated with a good degree of confidence regarding what can and cannot be achieved within viability parameters. The two primary cases in point are:
- HRA6 Kemprow Farm, Watford Road, Radlett – this is the second largest allocation after Bowmans Cross, and is one of only a small number of proposed Green Belt allocations where work is yet to be undertaken on a planning application. A key issue is understanding the potential to deliver on-site school capacity, potentially to include a secondary school to (potentially) meet the established need for a new secondary in the west of the Borough. It could transpire that delivering a school could affect site capacity and/or necessitate comprising on wider objectives, which are matters that could be further explored. The site is expected to begin delivering within 5 years but there could be a need for work on land equalisation.
 - HBA15 Golf Course Site and North of Allum Lane, Borehamwood – it appears likely that the northern part of the site would need to achieve access from the southern part, but the southern part is the subject of a pending planning application, which clearly presents a challenge, yet the site is expected to begin delivering within the first five years of the plan. There is more broadly a need to ensure a comprehensive approach to growth to the west of Borehamwood, including from a Green Belt perspective, and these are matters that could be explored further with a view to added DM policy detail aimed at ensuring successful delivery.
- 9.17.6. A final consideration is cumulative effects, i.e. the effects of the Local Plan in combination with other local plans (and wider plans). In this regard, there is clear support for the proposal not to generate unmet housing need, given that unmet need is already an issue in the sub-region, but neither is the proposal to make provision for unmet need from elsewhere. Also, the risk is that the Local Plan will generate an unmet need in respect of Gypsy and Traveller accommodation needs. The final 'needs' consideration is then employment land, and overall it appears that the strategy is proactive, including in respect of supporting a site that crosses over into LB Enfield.
- 9.17.7. Aside from development need considerations, there is a need for ongoing work in respect of transport infrastructure, notably in the west of the Borough, including in respect of junctions onto the M1. A further key consideration is a need for ongoing close working with St Albans District in respect of Bowman's Cross, recognising its close proximity to London Colney, which is a proposed location for growth within the recently adopted St Albans Local Plan, and recognising that St Albans are now commencing a new Local Plan that will need to provide for significantly higher growth. Finally, there is a need for ongoing close working with Welwyn Hatfield District in respect of the expansion of Potters Bar, accounting for in-combination impacts on infrastructure capacity.

Part 3: Next steps

10. Plan finalisation

11. Plan finalisation

- 11.1.1. Once the period for representations on the Local Plan / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period.
- 11.1.2. The Council will also submit the SA Report.
- 11.1.3. At examination one or more Government-appointed Inspector(s) will consider representations before identifying modifications necessary for soundness.
- 11.1.4. Modifications will then be prepared (alongside SA if necessary) and subjected to consultation (alongside an SA Report Addendum if necessary).
- 11.1.5. Once found to be 'sound' the Local Plan will be adopted.
- 11.1.6. At the time of adoption a 'Statement' must be published that sets out (amongst other things) "the measures decided concerning monitoring".

12. Monitoring

- 12.1.1. The requirement here is to present "measures envisaged concerning monitoring".
- 12.1.2. A focus might be on monitoring the delivery of a selection of key proposed allocations, with a view to flagging both: A) sites that are not coming forward in accordance with the anticipated trajectory (i.e. sites are delayed or are not delivering to the anticipated capacity); and B) sites that are coming forward with compromises made in terms of policy objectives. Specific considerations for future monitoring might include:
 - Accessibility – are sites delivering community infrastructure as anticipated?
 - Biodiversity – are sites delivering 20% BNG?
 - Climate change adaptation – is flood risk affecting the delivery of any allocations and what steps are being taken to avoid and mitigate risk accounting for climate change?
 - Climate change mitigation – are any sites delivering as net zero developments?
 - Economy & employment – are key sites delivering or progressing towards delivery as anticipated? In general, employment land needs warrant regular monitoring as this will be an important consideration for a future local plan review. There is a clear case for work to explore employment land needs/opportunities at a larger-than-local scale.
 - Historic environment – are sites able to avoid and mitigate impacts to key assets in the manner envisaged by site-specific policies? What effect are HIA having?
 - Homes – are sites delivering the full policy quota of affordable housing? Are any of the strategic sites delivering, or considering delivering, Gypsy and Traveller pitches?
 - Transport – are sites able to deliver the transport upgrades envisaged by policies and as set out in the Infrastructure Delivery Plan?
 - Water – is site delivery being impacted by uncertainties in respect of water supply / resources or capacity at wastewater treatment works?

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this SA Report reflects the reporting requirements set out in the Regulations.

Table A: Questions answered by this SA Report, in-line with an interpretation of requirements

Questions answered		As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the sustainability 'context'?	- Relevant environmental protection objectives, established at international or national level - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the SA scope?	- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan - The environmental characteristics of areas likely to be significantly affected - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the sustainability 'baseline'?	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) - The likely significant effects associated with alternatives - Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SA findings at this current stage?	- The likely significant effects associated with the draft plan - The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?	A description of the monitoring measures envisaged

Table B: Interpreting Schedule 2 and linking the interpretation to the report structure

Schedule 2	Interpretation of Schedule 2		
The report must include...	The report must include...		
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>	i.e. answer – <i>What's the scope of the SA?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>	
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'		
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What's the 'baseline'?</i>	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance		
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]	

Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3. The SA scope – in terms of key sustainability issues and objectives, including accounting for evolution of the baseline without the plan – is then discussed throughout the report as appropriate, i.e. in light of the scope of the plan/alternatives.
c) The environmental characteristics of areas likely to be significantly affected;	
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) fed into the 'SA framework', which is presented within Section 3. Also, information on the SA scope is presented throughout this report. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains reasons for supporting the preferred option, i.e. how/why the preferred option is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the Local Plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the various effect characteristics.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan...	Section 9 presents recommendations but perhaps more importantly flags 'tensions' that can be a focus of further work ahead of plan finalisation.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives / scenarios appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is presented at the start of the report.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan...	This SA Report is published alongside the Proposed Submission Local Plan in order to inform representations and then subsequent plan-making stages. Specifically, the next stage is expected to be examination in public.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5 [and] the opinions expressed pursuant to Article 6... shall be taken into account during the preparation of the plan... and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when finalising the plan as part of the examination in public. It should also be noted that Interim SA Reports were published as part of earlier consultations under Regulation 18.

