

Hertsmere Local Plan HRA

Regulation 19 Habitats Regulations Assessment

Hertsmere Borough Council

September 2026

Quality information

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1. Introduction

1.1 Background

- 1.1.1 AECOM has been appointed by Hertsmere Borough Council (the Council) to undertake a Habitats Regulations Assessment (HRA) of the emerging Hertsmere Local Plan (HLP). The first stage of this process is an initial Test of Likely Significant Effects (or HRA Screening) on the identified (those sites previously allocated and with planning permission) and potential sites, for housing and commercial development and associated proposed policies.
- 1.1.2 The objective of the screening is to identify any aspects of the HLP that may result in Likely Significant Effects (LSE) on the integrity of the National Site Network (NSN), either in isolation or in combination with other plans and projects. The NSN comprises Habitats Sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites).
- 1.1.3 The planning period for the emerging HLP is 2026 to 2043.

1.2 Legislation

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

Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

"A competent authority, before deciding to ... give any consent, permission or other authorisation for, a plan or project which – (a) is likely to have a significant effect on a European site ... (either alone or in combination with other plans or project)... must make an appropriate assessment of the implications of the plan or project in view of the site's conservation objectives... The competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site".

Figure 1: The legislative basis for Appropriate Assessment

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

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

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

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

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

1.3 Scope of Assessment

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

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

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

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

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

1.4 Quality assurance

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

2. Methodology

2.1 Introduction to HRA Methodology

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

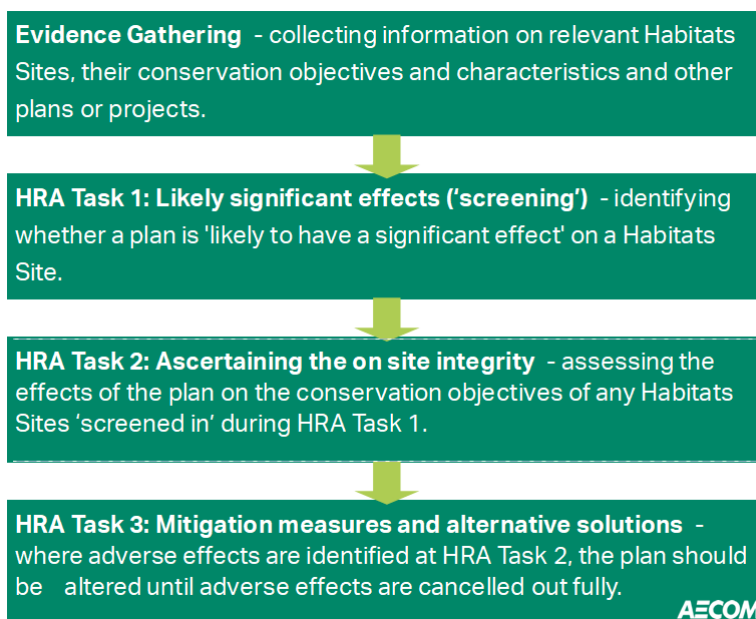


Figure 2: Four Stage Approach to Habitats Regulations Assessment. Source EC, 2021.

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

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

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

2.2 Description of HRA Tasks

HRA Task 1 – Screening for Likely Significant Effects

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

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

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

HRA Task 2 – Appropriate Assessment

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

HRA Task 3 – Avoidance and Mitigation

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

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

¹¹ Case C-461/17

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

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

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

2.3 In-combination Plans

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

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

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

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

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

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

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

¹⁵ Available at: <https://enfield.moderngov.co.uk/documents/s110940/Traveller%20Local%20Plan%20Regulation%2019%20report.pdf> [Accessed 27/01/2026]

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

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

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

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

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

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

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

3. Habitats Sites Background

3.1 Chilterns Beechwoods SAC

Introduction²³

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

Qualifying Features²⁴

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

Conservation Objectives²⁵

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

Environmental Vulnerabilities²⁶

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

3.2 Epping Forest SAC

Introduction²⁷

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

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

²⁴ Ibid

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

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

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

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

Qualifying Features²⁸

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

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

Conservation Objectives²⁹

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

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

Environmental Vulnerabilities³⁰

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

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

3.3 Lee Valley Ramsar

Introduction³¹

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

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

²⁸ Ibid

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

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

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

Qualifying Features³²

3.3.3 The Ramsar is designated for the following features:

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

Conservation Objectives

3.3.4 The legal conservation status is as defined for;

- Lee Valley SPA.

Environmental Vulnerabilities

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

3.4 Lee Valley SPA

Introduction³³

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

Qualifying Features³⁴

3.4.2 The SPA is designated for the following features:

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

Conservation Objectives³⁵

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

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

Environmental Vulnerabilities³⁶

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

- Water pollution,
- Hydrological Changes,

³² [ibid](#)

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

³⁴ [ibid](#)

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

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

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

3.5 Wormley-Hoddesdonpark SAC

Introduction³⁷

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

Qualifying Features³⁸

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

Conservation Objectives³⁹

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

Environmental Vulnerabilities⁴⁰

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

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

³⁸ Ibid

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

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

4. Identified Impact Pathways

4.1 Evaluation of impact pathways

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

Table 1. Potential Impact pathways applicable to Habitats Sites

Habitats Sites	Potential Impact Pathways
Chilterns Beechwoods SAC	• Air pollution: Nitrogen deposition • Loss of functionally linked habitat for stag beetle • Recreational Pressure
Epping Forest SAC	• Air pollution: Nitrogen deposition • Loss of functionally linked habitat for stag beetle • Recreational pressure • Water quality • Water quantity, Level and Flow
Lee Valley SPA / Ramsar	• Air pollution: Nitrogen deposition • Loss of functionally linked habitat • Recreational pressure • Water quality • Water quantity, Level and Flow
Wormley-Hoddesdonpark SAC	• Air pollution: Nitrogen deposition • Recreational pressure

4.2 Atmospheric Pollution (Nitrogen Deposition)

- 4.2.1 The main pollutants of concern for Habitats Sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂) and are summarised in Table 2. Ammonia can have a direct toxic effect upon vegetation, particularly at close distances to the source, such as near road verges⁴¹. NO_x can also be toxic at very high concentrations (far above the annual average Critical Level). High levels of NO_x and NH₃ are likely to increase the total nitrogen (N) deposition to soils, potentially leading to deleterious knock-on effects in resident ecosystems. Increases in atmospheric nitrogen deposition can, if sufficiently large, enhance soil fertility and lead to eutrophication. This often has adverse effects on the community composition and quality of semi-natural, nitrogen-limited terrestrial and aquatic habitats⁴²
⁴³.

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

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

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

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

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

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

	future years, shipping is likely to become one of the most important contributors to SO ₂ emissions in the UK.	regarded as a threat to plant communities. For example, decreases in Sulphur dioxide concentrations have been linked to the return of lichen species and improved tree health in London.
Acid deposition	Leads to acidification of soils and freshwater via atmospheric deposition of SO ₂ , NO _x , ammonia, and hydrochloric acid. Acid deposition from rain has declined by 85% in the last 20 years, with most of this attributed to lower sulphate levels.	Gaseous precursors (e.g. SO ₂) can cause direct damage to sensitive vegetation, such as lichen, upon deposition. Can affect habitats and species through both wet (acid rain) and dry deposition. The effects of acidification include lowering of soil pH, leaf chlorosis, reduced decomposition rates, and compromised reproduction in birds/plants. Not all sites are equally susceptible to acidification. This varies depending on soil type, bedrock geology, weathering rate and buffering capacity. For example, sites with an underlying geology of granite, gneiss and quartz-rich rocks tend to be more susceptible.
Ammonia (NH ₃)	Ammonia is a reactive, soluble, alkaline gas released following the decomposition and volatilisation of animal wastes. It is a naturally occurring trace gas, but ammonia concentrations are directly related to the distribution of livestock, and it is also emitted from some industrial processes and vehicle exhausts. Ammonia reacts with acid pollutants such as the products of SO ₂ and NO _x emissions to produce fine ammonium (NH ₄ ⁺) – containing aerosol. Due to its significantly longer lifetime, NH ₄ ⁺ may be transferred much longer distances (and can therefore be a significant transboundary issue). While ammonia deposition rates can be estimated from atmospheric concentrations; they are strongly influenced by meteorology and ecosystem type.	The negative effect of NH ₄ ⁺ may occur via direct toxicity, when uptake exceeds detoxification capacity and via nitrogen accumulation. Its main adverse effect is eutrophication, leading to assemblages dominated by fast-growing, tall species. For example, a shift in dominance from heath species (lichens, mosses) to grasses is often seen. As emissions mostly occur at ground level in rural environments and NH ₃ is rapidly deposited, some of the most acute problems of NH ₃ deposition occur in small relict nature reserves located in intensive agricultural landscapes.
Nitrogen oxides (NO _x)	Nitrogen oxides are mostly produced in combustion processes. Half of NO _x emissions in the UK derive from motor vehicles, one quarter from power stations and the rest from other industrial and domestic combustion processes. NO _x concentrations have been falling for decades due to improvements in vehicle emissions technology, and this will accelerate after 2035 as electric vehicles (or other non-combustion engine vehicles) spread through the vehicle fleet following the Government's ban on the sale of new petrol and diesel cars and vans in 2035.	Direct toxicity effects of gaseous nitrates are likely to be important in areas close to the source (e.g. roadside verges). A critical level of NO _x for all vegetation types has been set to 30 µg/m ³ . Deposition of nitrogen compounds (nitrates (NO ₃), nitrogen dioxide (NO ₂) and nitric acid (HNO ₃)) contributes to the total nitrogen deposition and may lead to both soil and freshwater acidification. In addition, NO _x contributes to soil and water eutrophication, altering plant community species composition at the expense of sensitive species.
Nitrogen (N) deposition	The pollutants that contribute to the total nitrogen deposition derive mainly from oxidised (e.g. NO _x) or reduced (e.g. NH ₃) nitrogen emissions (described separately above). While oxidised nitrogen mainly originates from major conurbations or highways, reduced nitrogen mostly derives from farming practices. The nitrogen pollutants together are a large contributor to acidification (see above).	All plants require nitrogen compounds to grow, but excessive overall N is widely regarded as the major driver of biodiversity change globally. Species-rich plant communities with high proportions of slow-growing perennial species and bryophytes are most at risk from nitrogen eutrophication. This is because many semi-natural plants cannot assimilate the surplus nitrogen as well as many graminoid (grass) species. Nitrogen deposition can also increase the risk of damage from abiotic factors, e.g. drought and frost.
Ozone (O ₃)	A secondary pollutant generated by photochemical reactions involving NO _x , volatile organic compounds (VOCs) and sunlight. These precursors are mainly released by the combustion of fossil fuels (as discussed above). Increasing anthropogenic emissions of ozone precursors in the UK have led to more days when ozone levels exceed 40 ppb ('episodes' or 'smog'). Reducing ozone pollution is believed to	Concentrations of O ₃ above 40 ppb can be toxic to both humans and wildlife, and can affect buildings. High O ₃ concentrations are widely documented to cause damage to vegetation, including visible leaf damage, reductions in floral biomass, reductions in crop yield (e.g., cereal grains, tomato, potato), reductions in the number of flowers, decreases in forest production, and altered species composition in semi-natural plant communities.

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

- 4.2.2 Sulphur dioxide emissions overwhelmingly derive from power stations and industrial processes that require the combustion of coal and oil, as well as (particularly on a local scale) shipping⁴⁵. As such, these will not be associated with Local Plan growth. Ammonia emissions originate from agricultural practices⁴⁶, with some chemical processes also making notable contributions and traffic also contributing materially at a local scale. NOx emissions are dominated by the output of vehicle exhausts (more than half of all emissions). A 'typical' housing development will contribute by far the largest portion of its overall NOx footprint (92%) through associated road traffic. Other sources, although relevant, are of minor importance (8%) in comparison⁴⁷. Therefore, emissions of NOx and ammonia can reasonably be expected to increase as a result of the Plan, primarily due to increased commuter traffic associated with housing growth.
- 4.2.3 The World Health Organisation has the following critical thresholds for plant communities: The critical NOx concentration (critical level) for the protection of vegetation is 30 $\mu\text{g m}^{-3}$ and the critical level for ammonia 1-3 $\mu\text{g m}^{-3}$ (depending on whether normal vegetation or lichens and bryophytes are involved). Additionally, ecological studies have determined 'Critical Loads'⁴⁸ of atmospheric nitrogen deposition (that is, NOx combined with ammonia NH_3).
- 4.2.4 According to the Department of Transport's Transport Analysis Guidance, beyond 200m, the contribution of vehicle emissions from the roads to local pollution levels is insignificant (Figure 3 and reference ⁴⁹). Therefore, this distance has been used throughout this HRA to determine whether Likely Significant Effects (LSEs) on sensitive Habitats Sites may arise due to implementation of the Plan.

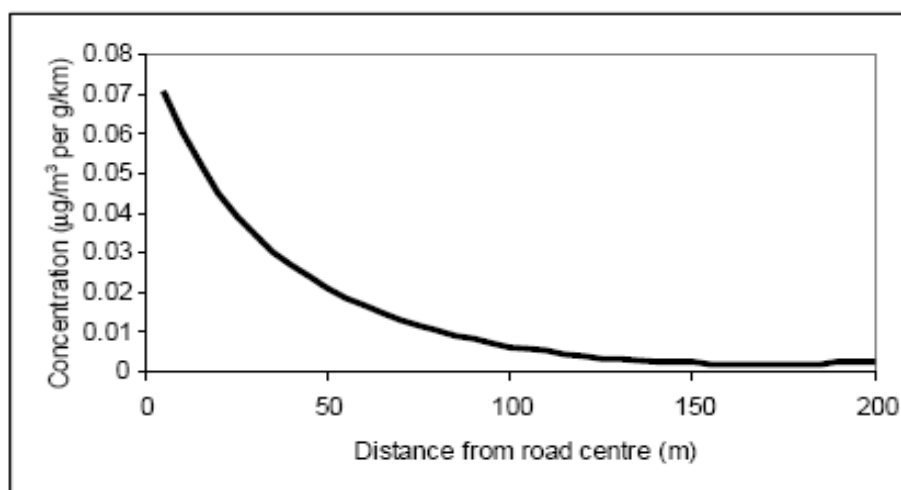


Figure 3: Traffic contribution to concentrations of pollutants at different distances from a road (Source: DfT⁵⁰)

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

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

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

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

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

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

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

- Wormley-Hoddesdonpark SAC.

4.3 Loss of Functionally Linked Habitat

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

4.4 Recreational Pressure

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

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

⁵² Weitowitz D.C., Panter C., Hoskin R. & Liley D. (2019). The effect of urban development on visitor numbers to nearby protected nature conservation sites. *Journal of Urban Ecology* 5. <https://doi.org/10.1093/jue/juz019>

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4.5 Water Quality

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

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

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

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

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

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

4.6 Water Quantity, Level and Flow

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

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

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

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

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

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

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

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

5. Screening for Likely Significant Effects

5.1 Atmospheric Pollution (Nitrogen Deposition)

Screening Methodology

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

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

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

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

Chilterns Beechwoods SAC

5.1.4 The Chilterns Beechwoods SAC is bisected by the B4506, and there is therefore a major road within 200m of the SAC.

⁷¹ Travel to Work: Census 2021 available at [Travel to work, England and Wales - Office for National Statistics](https://www.ons.gov.uk/peoplepopulationandcommunity/communitiesanddemography/censusesandsurveys/census2021/dataandvisualisations/traveltowork) [Accessed 09/02/2026]

- 5.1.5 The Chilterns Beechwoods SAC is extensive, covering a number of locations. At its closest point, the SAC is just over 15 km from the HLP boundary and therefore beyond the distance at which impacts are likely to occur.
- 5.1.6 It is therefore concluded that the HLP will not result in LSE on Chilterns Beechwoods SAC through the impact pathway of atmospheric pollution, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Epping Forest SAC

- 5.1.7 The Epping Forest SAC is bisected by a number of "A" roads and is within 200m of the M25.

The Epping Forest SAC is approximately 11.5 km east of the HLP boundary and therefore beyond the distance where impacts are likely to occur. Furthermore, the most likely route for taking commuters from Hertsmere to the SAC is the M25, which passes through the Bell Common Tunnel, designed to protect Epping Forest SAC by taking traffic under it.

Whilst a number of strategic employment allocations are located close to Junction 24 of the M25 and South Mimms, Epping Forest SAC remains beyond the screening distance applied within this HRA. Potential effects associated with additional HGV movements have been considered. However, no evidence has been identified indicating that employment-related traffic generated by the Local Plan would result in a measurable effect on habitat conditions within the SAC. Furthermore, the section of the M25 passing through Epping Forest is located within the Bell Common Tunnel, reducing the potential for direct atmospheric deposition effects on SAC habitats. Accordingly, Epping Forest SAC is not considered likely to be significantly affected through atmospheric pollution arising from Local Plan growth.

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

Lee Valley SPA /Ramsar

- 5.1.8 The northernmost parts of the SPA/Ramsar are approximately 50m from the A414. Southern parts of the SPA/Ramsar are within 200m of the A503 and A1055
- 5.1.9 Natural England's Site Improvement Plan (SIP) indicates that air pollution in the form of nitrogen deposition is a threat to the qualifying species, bittern. Note that bittern is not a qualifying species of the Ramsar and therefore no further consideration of the Ramsar is given in this assessment.
- 5.1.10 The Lee Valley SPA covers a number of sites over approximately 25km on a north/south axis. Areas in close proximity to major roads are localised to the Rye Meads SSSI in the north and the Walthamstow Reservoirs SSSI in the south. Both of these SSSIs are more than 12km from the HLP boundary and therefore beyond the distance where impacts are likely to occur.
- 5.1.11 It can therefore be concluded that the HLP will not result in LSE on Lee Valley SPA / Ramsar through the impact pathway of atmospheric pollution, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Wormley-Hoddesdonpark SAC

- 5.1.12 The SAC is within 200m of the A10, a major road. The point at which the road comes into proximity with the SAC is approximately 11 km distant and therefore beyond the distance where impacts are likely to occur.
- 5.1.13 It can therefore be concluded that the HLP will not result in LSE on Wormley-Hoddesdonpark SAC through the impact pathway of atmospheric pollution, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

5.2 Loss of Functionally Linked Habitat

Chilterns Beechwoods SAC

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

Epping Forest SAC

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

Lee Valley SPA/Ramsar

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

5.3 Recreational Pressure

Chilterns Beechwoods SAC

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

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

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

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

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

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

Epping Forest SAC

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

Lee Valley SPA/Ramsar

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

Wormley-Hoddesdonpark SAC

- 5.3.10 The SAC is located approximately 4.5km northwest of the Hertsmere district boundary. There is no recreational impact zone specifically defined for the SAC; however, 7km is used in this HRA based on the recreational catchment defined by Wealden Council for Ashdown Forest SAC/SPA and is larger than the 6.2km core catchment of Epping Forest SAC, which are both woodland SACs that have a probably greater recreational draw than Wormley Hoddesdonpark Woods SAC⁷⁸
- 5.3.11 The following HLP policies provide for residential development within the Zone of Influence (Zoi) for this SAC.
- Policy HPBA1 Potters Bar Town Centres
- 5.3.12 The specific residential site allocations proposed within the Zoi are:
- HPBA SA1 (588 dwellings)
 - HPBA SA2 (369 dwellings)
 - HPBA SA4 (55 dwellings)
 - HPBA SA5 (96 dwellings)
 - HPBA SA6 (119 dwellings)
 - HPBA SA12 (260 dwellings)

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

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

⁷⁸ Available at: <https://www.wealden.gov.uk/UploadedFiles/11.-Ashdown-Forest-SPA-Mitigation-Zone.pdf> [Accessed [28/01/2026]] and [EFSAC Guidance Note](#) [Accessed 21/09/26]]

- HPBA SA13 (550 dwellings)
 - HPBA SA14 (112 dwellings)
 - Barnet Road Strategic Urban Extension (Previously CFS-2025-163) (900 dwellings)
- 5.3.13 The sum of dwellings from these proposed site allocations, within the ZoI for the SAC is 3,049 dwellings.
- 5.3.14 Natural England, in its response to Regulation 18 consultation, identified that recent condition assessment work undertaken within Wormley-Hoddesdonpark Woods SAC had identified evidence of recreational damage and noted that as a result several component SSSI units are currently assessed as being in unfavourable condition. The evidence includes vegetation trampling, littering and eutrophication associated with recreational activity including dogs.
- 5.3.15 Whilst recreational impacts are known to occur at the SAC, there is currently no visitor survey and therefore no evidence of the origin of these visitors. The available evidence confirms that recreational effects are occurring but does not identify the geographical origin of visitors or demonstrate that future Local Plan growth within Hertsmere would materially contribute to those impacts. While this HRA has used a core recreational catchment of 7km this may be an overestimate (for example Epping Forest SAC which is likely a much bigger recreational draw has a recreational catchment of 6.2km with most visitors outside London coming from within 3km).
- 5.3.16 Updated GIS analysis identifies that the allocations located within the 7km assumed recreational catchment comprise HPBA SA1, HPBA SA2, HPBA SA4, HPBA SA5, HPBA SA6, HPBA SA12, HPBA SA13, HPBA SA14 and Barnet Road Strategic Urban Extension (Previously CFS-2025-163). These allocations are all located approximately 5.4km to 6.7km from the SAC and therefore on the outer reaches of that assumed catchment. No allocations elsewhere within the Borough fall within the precautionary 7km recreational catchment, with the next nearest major allocation (HBCA SA1) located approximately 9.3km from the SAC. Most Borehamwood, Radlett and Bushey allocations are located more than 11km from the site.
- 5.3.17 The existing surrounding settlement pattern suggests that existing communities within Broxbourne are likely to represent the principal source of routine recreational use as existing settlements around the SAC are not evenly spread across the 7km assumed catchment. Residential areas within Broxbourne (which will also be a core location for future growth in the Broxbourne Local Plan) are substantially closer to the SAC than any in Hertsmere, with some settlements located within approximately 1-1.5km of the designated site, easy walking distance. By contrast, residents of Potters Bar generally require access by private vehicle and there is limited parking at the SAC which will inherently limit the number of visitors who can drive to site within a day, and no direct highways linkage between the principal growth locations and the SAC.
- 5.3.18 The SAC also benefits from existing active visitor management although Natural England's condition assessment suggests the existing management needs to be more targeted within the SAC. Recreational activity is concentrated along a well-established path network and the site is managed through long-term woodland and access management measures. The Wormley Wood and Nut Wood Management Plan confirms the continued maintenance and improvement of visitor infrastructure, including surfaced routes and associated access facilities intended to accommodate recreational use whilst protecting ecological interest features.
- 5.3.19 The physical capacity of the SAC to accommodate additional vehicle-borne visitors is also relevant. The SAC is served by only two relatively small car parks, which naturally limits the number of visitors arriving by private vehicle at any one time. This contrasts with the larger and more accessible recreational destinations located closer to Potters Bar. Whilst not eliminating the possibility of additional visits, the limited parking provision acts as a practical constraint on substantial increases in visitor pressure arising from more distant settlements.
- 5.3.20 In addition, residents of Potters Bar have access to a range of alternative recreational destinations located closer to the proposed growth areas than Wormley-Hoddesdonpark Woods SAC, including Northaw Great Wood Country Park, Trent Country Park, Gobions Wood Nature Reserve and other areas of accessible woodland and parkland within the wider area. These destinations are likely to accommodate a substantial proportion of routine recreation generated by new residents.

- 5.3.21 Impacts in combination must also be considered. The SAC is located within the Borough of Broxbourne. The Habitats Regulations Assessment for the Broxbourne Local Plan considered recreational disturbance at Wormley-Hoddesdonpark Woods SAC and concluded that a likely significant effect arising from the Local Plan, both alone and in combination with other plans and projects, could be objectively ruled out despite the proximity of settlements in Broxbourne to the SAC. Whilst each plan must be assessed on its own merits, the findings of the neighbouring authority's HRA provide additional evidence regarding the ability of the SAC to accommodate planned growth without likely significant effects.
- 5.3.22 Taking these factors together, there is no objective evidence to conclude that residential growth proposed by the Hertsmere Local Plan would result in a Likely Significant Effect on Wormley-Hoddesdonpark Woods SAC through recreational pressure, either alone or in combination with other plans and projects. Accordingly, Wormley-Hoddesdonpark Woods SAC can be screened out from further assessment in relation to this pathway.

5.4 Water Quality

- 5.4.1 The HPLA is largely within the Colne Water Management Catchment. However, part of the eastern area of Potters Bar falls within the Lee Lower Rivers and Lakes Catchment (Turkey Brook and Cuffley Brook catchments).
- 5.4.2 A limited number of allocations are located within this catchment and therefore a potential hydrological pathway exists between development proposed through the Local Plan and Lee Valley SPA/Ramsar. These pathways are considered further below.

Epping Forest SAC

- 5.4.3 The Site Improvement Plan⁷⁹ for Epping Forest SAC indicates that the potential threat from water quality to the SAC arises from runoff from roads. As discussed in the screening for Air Pollution, the likely pathway is through commuting traffic on the M25, which goes through a tunnel at the point of proximity to the SAC, thereby protecting the SAC from surface water runoff.
- 5.4.4 The Epping Forest SAC is bisected by a number of "A" roads and is within 200m of the M25.
- 5.4.5 The Epping Forest SAC is approximately 11.5 km east of the HPLA and therefore within the average car/van journey distance of 13.2 km.
- 5.4.6 Epping Forest SAC is hydrologically connected to the HPLA, specifically to HPBA SA12 and HEM SA01 via the Lee Lower Rivers and Lakes catchment. However, water runoff from the sites and entering the water system flows east before joining the Lee River which then flows away from Epping Forest and towards London. Surface runoff from these sites cannot therefore impact Epping Forest SAC.
- 5.4.7 It can therefore be concluded that the HLP will not result in LSE on Epping Forest SAC through the impact pathway of water quality, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Lee Valley SPA/Ramsar

- 5.4.8 Lee Valley SPA and Ramsar site are susceptible to changes in water quality. Parts of the Hertsmere Local Plan Area, specifically the eastern Potters Bar area, fall within the Lee Lower Rivers and Lakes catchment and therefore a potential hydrological pathway exists between a limited number of allocations and the Lee Valley SPA/Ramsar. The allocations identified within the Lee catchment are HPBA SA12 (Land rear of Park Avenue, Potters Bar) and HEM SA01 (Land southeast of Junction 24, M25).
- 5.4.9 Natural England's Regulation 18 response to the HLP noted that consideration should be given to all hydrological pathways affecting Lee Valley SPA/Ramsar and not solely the relationship between growth and Rye Meads Wastewater Treatment Works. Natural England further noted that parts of

⁷⁹ Available at: <https://publications.naturalengland.org.uk/file/5732004727881728> [Accessed 06/02/2026]

Hertsmere fall within the Lee Lower Rivers and Lakes Catchment and considered that additional evidence was required to demonstrate that likely significant effects could be ruled out ⁸⁰.

- 5.4.10 However, Lee Valley SPA/Ramsar does not comprise a single wetland system and instead consists of a number of physically distinct component sites. The SPA/Ramsar includes Rye Meads SSSI, Amwell Quarry SSSI, Turnford and Cheshunt Gravel Pits SSSI and Walthamstow Reservoirs SSSI. Each of these supports the qualifying bird interest of the SPA/Ramsar and in some cases the aquatic plant interest of the Ramsar site, but differs in terms of its physical characteristics, management and hydrological context ⁸¹.
- 5.4.11 Rye Meads SSSI predominantly comprises flood meadows and lagoons and is closely associated with the Rye Meads wastewater treatment and wetland system. By contrast, Amwell Quarry SSSI comprises six former gravel pits that now function as lakes, whilst Turnford and Cheshunt Gravel Pits SSSI also comprises a series of former gravel pits and associated open water habitats. Walthamstow Reservoirs SSSI comprises a large sealed storage reservoir complex. Therefore, whilst hydrological connectivity exists at a broad catchment level, the SPA/Ramsar should not be regarded as a single uniform receptor and it cannot be assumed that all components have an equivalent relationship with treated wastewater pathways. All component parts of the SAC except for Rye Meads SSSI are physically separated from the River Lee and depend on either groundwater (the flooded gravel pits) or active pumping.
- 5.4.12 A review of available strategic water planning evidence also indicates that Lee Valley SPA/Ramsar has been considered extensively through Thames Water's strategic planning framework. Thames Water's Water Resources Management Plan Habitats Regulations Assessment assessed Lee Valley SPA/Ramsar in relation to major strategic water resource schemes and concluded that adverse effects on site integrity could be ruled out following implementation of mitigation measures ⁸².
- 5.4.13 The Thames Water's Drainage and Wastewater Management Plan Habitats Regulations Assessment specifically assessed potential impacts associated with water pollution and hydrological change. Lee Valley SPA and Lee Valley Ramsar were included within that assessment and, taking account of proposed mitigation and project-level assessment requirements, Thames Water concluded that it was unlikely that the DWMP would adversely affect the integrity of Habitats Sites either alone or in combination with other plans and projects ⁸³.
- 5.4.14 The Thames Water WRMP and DWMP are both based on robust population projections and therefore provide strategic evidence that future growth, wastewater infrastructure upgrades, treatment works expansion, catchment transfers and wider wastewater network improvements can be planned and delivered within the Thames Water region whilst avoiding adverse effects on the integrity of Lee Valley SPA/Ramsar.
- 5.4.15 Taking these factors together, whilst a broad hydrological pathway exists via the Lee catchment, there is no objective evidence that growth proposed through the Hertsmere Local Plan would result in a likely significant effect on Lee Valley SPA/Ramsar through water quality impacts, either alone or in combination with other plans and projects. Natural England's concern regarding consideration of downstream SPA/Ramsar components has been addressed through explicit consideration of the individual component sites and their differing hydrological characteristics. Accordingly, Lee Valley SPA/Ramsar can be screened out from further assessment in relation to water quality.

⁸⁰ Natural England (2018) *Site Improvement Plan: Lee Valley SPA/Ramsar*. SIP141218FINAL v1.0. [Site Improvement Plan: Lee Valley - SIP118](#)

⁸¹ Lepus Consulting (2019) *Broxbourne Local Plan Proposed Main Modifications Habitats Regulations Assessment Addendum*. Prepared for Broxbourne Borough Council. [exam-32f-main-modifications-hra](#)

⁸² Thames Water (2024) *Water Resources Management Plan 2024 Habitats Regulations Assessment*. Technical Appendix C. [C - Habitat Regulation Assessment](#)

⁸³ Thames Water (2023) *Drainage and Wastewater Management Plan 2025-2050: Habitats Regulations Assessment (Appendix L)*. Atkins, April 2023. [appendix-l-habitats-regulations-assessment.pdf](#)

5.5 Water Quantity, Level and Flow

- 5.5.1 The HPLA is largely in the Colne Water Management Catchment, however part of the HPLA to the east of Potters bar is within the Lee Lower Rivers and Lakes (Turkey Brook and Cuffley Brook Catchment).
- 5.5.2 A limited number of allocations are located within the Lee Lower Rivers and Lakes catchment and therefore a potential hydrological pathway exists between development proposed through the Local Plan and the Lee Valley SPA/Ramsar. These pathways are considered further below.

Epping Forest SAC

- 5.5.3 The Site Improvement Plan⁸⁴ for Epping Forest SAC indicates that the potential threat is inappropriate water levels. The SAC is within the “Lee Lower Rivers and Lakes” catchment.
- 5.5.4 Epping Forest SAC is hydrologically connected to the HPLA, specifically to HPBA and HEM SA01 via the Lee Lower Rivers and Lakes catchment. However, the Lee River flows away from Epping Forest SAC and therefore no pathway exists by which abstraction or hydrological changes associated with the Hertsmere Local Plan could affect the SAC.
- 5.5.5 It can therefore be concluded that the HLP will not result in LSE on the Epping Forest SAC through the impact pathway of water quantity, level and flow, either alone or in combination with other plans, and the site is screened out for AA in respect of this pathway.

Lee Valley SPA/Ramsar

- 5.5.6 Lee Valley SPA and Ramsar are susceptible to hydrological changes and alterations in water availability. Parts of the Hertsmere Local Plan Area fall within the Lee Lower Rivers and Lakes catchment and therefore a potential pathway exists whereby planned growth could increase demand for potable water supplies and, in turn, influence abstraction regimes within the wider Lee catchment.
- 5.5.7 The Hertsmere Local Plan will deliver significant housing and employment growth, including allocations within the Lee catchment. Increased population growth has the potential to increase demand for public water supply. The Hertsmere Water Cycle Study⁸⁵ identifies that Hertsmere lies within an area of serious water stress and identifies a difference between Local Plan growth assumptions and those utilised within the Affinity Water WRMP24⁸⁶. The Water Cycle Study therefore identifies water supply as a potential constraint requiring further consideration.
- 5.5.8 **As a credible hydrological pathway exists between plan growth and the water resources supporting Lee Valley SPA/Ramsar, likely significant effects cannot be ruled out at the screening stage. Lee Valley SPA and Lee Valley Ramsar are therefore taken forward to Appropriate Assessment in respect of water quantity, level and flow.**

6. Appropriate Assessment

6.1 Water Quantity, Level and Flow

Lee Valley SPA/Ramsar

- 6.1.1 Lee Valley SPA and Ramsar are vulnerable to hydrological change. The Site Improvement Plan identifies hydrological changes and water level management as pressures affecting the site and its

⁸⁴ Available at: <https://publications.naturalengland.org.uk/file/5732004727881728> [Accessed 06/02/2026]

⁸⁵ AECOM (2026). *Hertsmere Water Cycle Study (Final Report P03, September 2026)*. Prepared for Hertsmere Borough Council.

⁸⁶ Affinity Water (2024). *Water Resources Management Plan 2024 (WRMP24)*. October 2024.

⁸⁷ Affinity Water (2026). *Water Resources Management Plan 2024: Annual Review 2025/26*. June 2026.

qualifying interests. Increased population growth arising from the Hertsmere Local Plan has the potential to increase demand for potable water supplies and therefore a potential pathway exists whereby abstraction regimes within the wider Lee catchment could be affected.

- 6.1.2 The AECOM Water Cycle Study prepared for Hertsmere Borough Council identifies that Hertsmere lies within an area of serious water stress and notes that the level of growth proposed through the Local Plan exceeds the growth assumptions utilised within the Affinity Water WRMP24⁸⁸ ⁸⁹. The Water Cycle Study identifies a difference of approximately 11,000 dwellings between the growth assumptions used in the WRMP and those proposed through the Local Plan. However, the Water Cycle Study also records that Affinity Water confirmed that sufficient measures are proposed to manage demand and increase supply to meet future demand requirements⁹⁰. This applies in combination as well as alone because Affinity Water's future planning process is based on population growth assumptions across their supply area.
- 6.1.3 The statutory water resources planning framework provides the primary mechanism by which future water demand and abstraction pressures are addressed. The Affinity Water WRMP24 incorporates local authority growth forecasts and identifies a programme of abstraction reductions, environmental destination commitments, strategic transfers, demand management measures and new supply infrastructure intended to ensure long-term water resource resilience whilst reducing environmental pressure on sensitive catchments.
- 6.1.4 Further evidence is provided through the Affinity Water WRMP24 Annual Review 2025/26. This confirms that sustainability reductions identified through the Water Industry National Environment Programme have been implemented, including abstraction reductions affecting catchments associated with the River Lee system. The Annual Review further confirms that additional abstraction reductions and environmental destination measures continue to be developed, and that major strategic transfer and resilience schemes are progressing.
- 6.1.5 The relationship between water resource planning and Habitats Sites has itself been considered through the Affinity Water WRMP24 Habitats Regulations Assessment. The WRMP HRA specifically assessed pathways affecting Lee Valley SPA and Lee Valley Ramsar in relation to strategic water resource options associated with the River Lee system. Following Appropriate Assessment and implementation of mitigation measures, the WRMP HRA concluded that adverse effects on the integrity of Lee Valley SPA and Lee Valley Ramsar would not occur. The overall conclusion of the WRMP HRA was that implementation of WRMP24 would not adversely affect the integrity of any Habitats Site ⁹¹. This included assessment of pathways affecting Lee Valley SPA and Lee Valley Ramsar associated with abstraction and water resource management within the wider Lee catchment.
- 6.1.6 In addition, Policy SD18 (Water Supply and Wastewater) requires development to demonstrate adequate water supply capacity and secure infrastructure upgrades where required. Site allocation policies similarly require engagement with the relevant water companies and delivery of infrastructure in step with development. These policy safeguards provide an additional mechanism through which growth can only proceed where adequate infrastructure capacity is available.
- 6.1.7 **It is recommended that Policy SD18 Water Supply and Wastewater be amended to include the following wording:**
- 6.1.8 ***'Planning Applications that may affect a Habitats Site, either alone or in combination with other plans or projects, must provide sufficient information to enable Habitats Regulations Assessment to be undertaken where required under the Conservation of Habitats and Species Regulations 2017 (as amended).'***

⁸⁸ Affinity Water (2024) *Water Resources Management Plan 2024 (WRMP24)*.

⁸⁹ Affinity Water (2026) *Water Resources Management Plan 2024: Annual Review 2025/26*.

⁹⁰ AECOM (2026) *Hertsmere Water Cycle Study (P03 Final Report, September 2026)*.

⁹¹ Mott MacDonald (2023) *Affinity Water WRMP24 Habitats Regulations Assessment. SEA Environmental Report Appendix D*.

Appropriate Assessment Conclusion

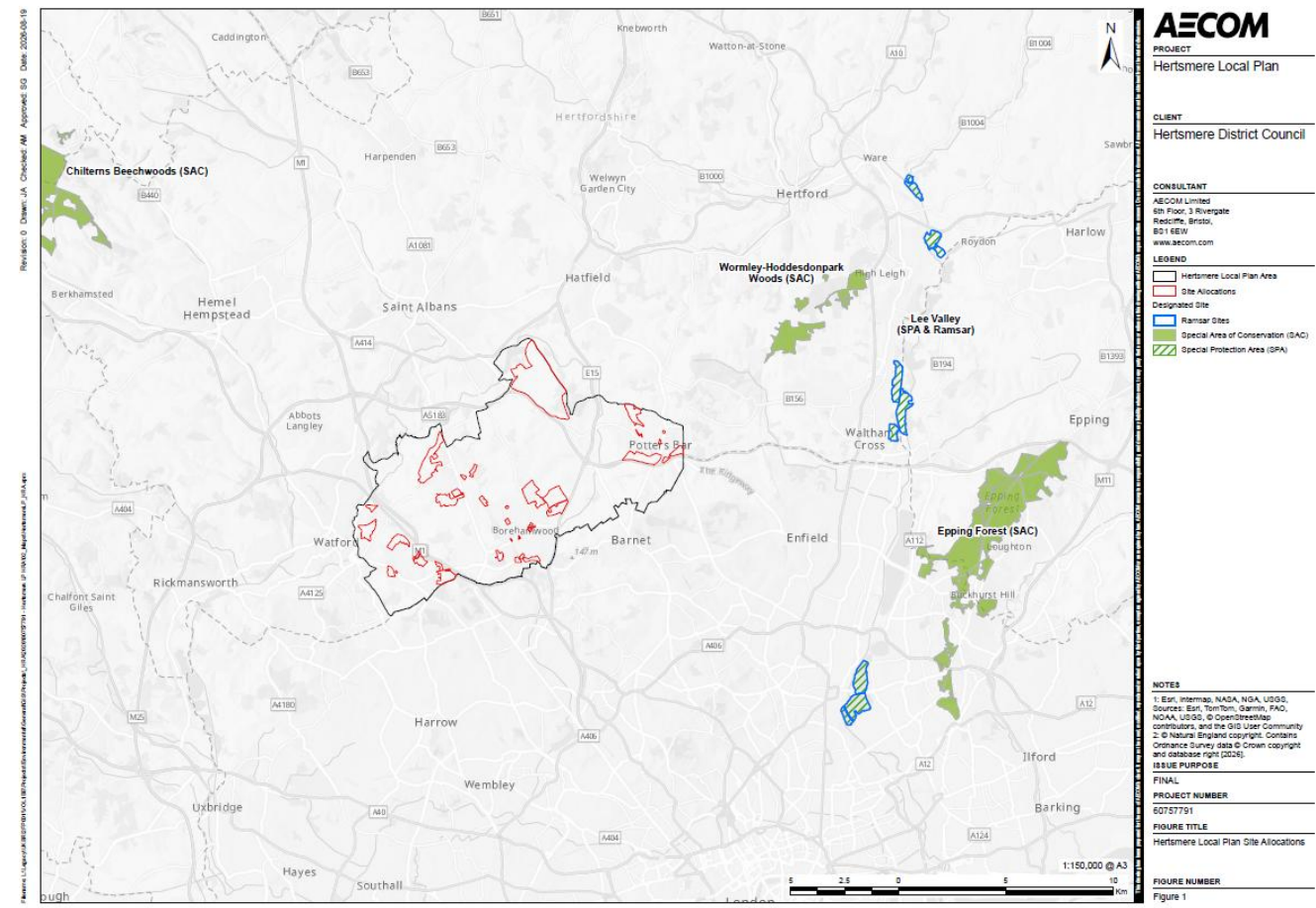
6.1.9 Taking account of:

- The Hertsmere Water Cycle Study;
- The Affinity Water WRMP24;
- The Affinity Water WRMP24 Annual Review 2025/26;
- The Affinity Water Habitats Regulations Assessment;
- The statutory water resources planning framework;
- Policy SDI8 and allocation-specific infrastructure requirements;

6.1.10 **It can be concluded that the Hertsmere Local Plan will not result in adverse effects on the integrity of Lee Valley SPA or Lee Valley Ramsar through the pathway of water quantity, level and flow, either alone or in combination with other plans and projects.**

Appendix A Figures

Figure 4 Site Allocations and Habitats Sites



Appendix B LSE Screening of Site Allocations

Table 3. Screening of Site Allocations

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonp ark SAC (km)	Screening outcome
CFS-2025-080 Land West of Vale Avenue, Borehamwood	Urban extension; residential development comprised of housing, open space and associated green infrastructure.	Residential: 98 dwellings	24	18	16	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA1 Borehamwood Town Centre Retail Park	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 501 dwellings	23	19	17	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA2 The Point, Shenley Road, Borehamwood	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town centre uses (at ground and lower levels) and residential above (with vertical intensification)	Residential: 200 dwellings	23	19	17	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA4, EWC Elstree Way North, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure and leisure uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 150 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA5 Hertsmere Civic Centre, Elstree Way,	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure and leisure uses (at ground and lower	Residential: 95 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonp ark SAC (km)	Screening outcome
Borehamwood	levels) and residential above (with vertical intensification).						
HBA SA6 EWC Civic Car Park, Elstree Way, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure and leisure uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 100 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA9 Borehamwood Fire Station, Elstree Way, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure (at ground level) and residential above (with vertical intensification).	Residential: 36 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA10 Borehamwood Job Centre, Elstree Way, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure (at ground level) and residential above (with vertical intensification).	Residential: 27 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA11 Cluster on Elstree Way, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of social/ community infrastructure (at ground level) and residential above (with vertical intensification).	Residential: 74 dwellings	23	18	17	13	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA13 Regent House & Car Park, north of Allum Lane Borehamwood	Urban Site; Comprehensive redevelopment comprised of residential and public realm (with vertical intensification).	Residential: 55 dwellings	23	19	17	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA14 Aycliffe Road and Leeming Road - shops and residential, Borehamwood	Urban Site; Comprehensive mixed-use redevelopment comprised of main town centre/ employment uses (at ground level), public realm and residential above (with vertical intensification).	Residential: 200 dwellings	22	19	18	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonp ark SAC (km)	Screening outcome
HBA SA17 Land North of Barnet Lane (West), Elstree	Urban extension; Development comprised of higher density residential and open space uses.	Residential: 73 dwellings	24	19	17	15	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA18 Land north of Barnet Lane, Borehamwood	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland).	Residential: 220 dwellings	24	18	18	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA19 Land south of Allum Lane to the west of Borehamwood. Elstree,	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained trees, woodland and hedgerows).	Residential: 150 dwellings	23	19	17	15	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA24 North of Allum Lane and Golf Course	Urban extension; residential development comprised of housing, open space and associated green infrastructure.	Residential: 486 dwellings	22	19	18	15	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA22 Old Haberdasher's Sports Ground - Croxdale Road, Borehamwood	Urban Site; Comprehensive redevelopment comprised of residential, open space and public realm (with vertical intensification).	Residential: 200 dwellings	23	19	18	14	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBA SA26 Organ Hall Farm, Theobald Street, Borehamwood	Urban extension; Development comprised of higher density residential and open space uses.	Residential: 102 dwellings	20	15	19	20	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBCA SA1 Land at Coursers Road, Bowmans Cross New Settlement	Strategic Site/ New Settlement; comprised of residential, main town centre, employment, open space, social community infrastructure, and infrastructure networks. Inclusive of retained woodland, trees, hedgerows and other natural landscape features.	Residential: 5000 dwellings (2500 in the plan period)	20	17	15	9.4	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark SAC (km)	Screening outcome
CFS-2025-051 St Hilda's School, High Street, Bushey, Hertfordshire	Urban redevelopment site; residential-led redevelopment of previously developed land.	Residential: 52 dwellings	20	24	22	20	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBUSA SA4 Land at Little Bushey Lane (west), Bushey	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained hedgerows).	Residential: 280 dwellings	20	23	21	18	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBUSA SA6 Land to the South of Elstree Road and East of Heathbourne Road, Bushey	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained hedgerows and woodland).	Residential: 1500 dwellings	21	22	19	18	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBUSA SA7 Bushey Golf and Country Club (Former Bushey Golf Course)	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained hedgerows and woodland).	Residential: 286 dwellings	20	24	24	20	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HBUSA SA8 Bushey Hall Golf Course, Bushey	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained hedgerows and woodland).	Residential: 500 dwellings	17	25	24	20	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
CFS-2025-167 Land On The North-West Side Of Caldecote Farm Caldecote Lane, Bushey	Urban extension; residential development.	Residential: 98 dwellings	21	22	20	18	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
Barnet Road Strategic Urban Extension, Potters Bar Land to the south of Potters Bar, east of Baker Street and west of Barnet Road	Strategic urban extension; residential-led development with supporting infrastructure, open space and associated community uses.	Residential: 900 dwellings	26	13	11	6	Screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it lies within the core 7km Zol. Likely Significant Effects. The following impact pathways are present: • Recreational pressure

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark SAC (km)	Screening outcome
HEL-0336-22 Harts Farm, Little Bushey Lane	Urban extension; residential development.	Residential: 57 dwellings	20	23	21	18	This allocation is screened out for all impact pathways as it is outside of the ZoI for all Habitats Sites.
HPBA SA1 Tesco Superstore, Mutton Lane, Potters Bar	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 588 dwellings	27	13	11	6	Screened in for Recreational Disturbance for Wormley-Hoddesdonpark Woods SAC as it lies within the core 7km ZoI. Likely Significant Effects. The following impact pathways are present: • Recreational pressure
HPBA SA2 Canada Life Place, Potters Bar	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town employment centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 369 dwellings Main Town Centre:	25	14	11	6	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km ZoI for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure
HPBA SA4 Potters Bar Railway Station Car Park, Darkes Lane, Potters Bar	Strategic Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification)	Residential: 55 dwellings Main Town Centre:	25	14	11	7	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km ZoI for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure
HPBA SA5 11 Darkes Lane, Potters Bar	Strategic Urban Site; Comprehensive mixed-use redevelopment comprised of main-town employment centre uses (at ground and lower levels) and residential above (with vertical intensification).	Residential: 96 dwellings Main Town Centre:	25	14	11	7	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km ZoI for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonpark SAC (km)	Screening outcome
HPBA SA6 Bus Garage, High Street, Potters Bar	Urban Site; Comprehensive redevelopment comprised of residential uses (with vertical intensification).	Residential: 119 dwellings Main Town Centre:	27	13	10	6	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km Zol for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure
HPBA SA12 Land East of Southgate Road, Potters Bar	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland).	Residential: 260 dwellings	28	14	10	5	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km Zol for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure • Water quality • Water quantity, level and flow
HPBA SA13 Potters Bar Golf Course	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland).	Residential: 550 dwellings	25	14	11	6	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km Zol for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure
HPBA SA14 Dove Lane, Potters Bar	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained trees and hedgerows)	Residential: 112 dwellings	25	14	11	6	This allocation is screened in for Recreational Disturbance for Wormley-Hoddesdonpark SAC as it is within the core 7km Zol for this site. Likely Significant Effects. The following impact pathways are present: • Recreational pressure
CFS-2025-064 Land South of Theobald Street	Urban extension; residential development.	Residential: 95 dwellings	19	21	20	15	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonp ark SAC (km)	Screening outcome
CFS-2025-075 Land West of Watling Street, Radlett, Hertfordshire	Urban extension; residential development.	Residential: 122 dwellings	19	21	20	15	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HRA SA3 Kemprow Farm, Watford Road, Radlett	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland and hedgerows).	Residential: 972 dwellings	18	23	21	17	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HRA SA5 Land South Of Shenley Hill Radlett Hertfordshire	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland and hedgerows).	Residential: 195 dwellings	20	21	20	15	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HRA SA6 Home Farm Meadows, Radlett	Urban extension; Development comprised of higher density residential and open space uses (inclusive of retained woodland and hedgerows).	Residential: 650 dwellings	19	22	21	16	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HRA SA7 Land off Watford Road, Radlett, Hertfordshire	Strategic urban extension; residential-led development with supporting infrastructure, open space and green infrastructure.	Residential: 350 dwellings	18	23	21	17	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
CFS-2025-194 Land off Oakridge avenue	Urban extension; residential development.	Residential: 101 dwellings	18	23	21	17	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
Additional Land between SA7 and Hill Farm	Strategic urban extension; residential-led development with supporting infrastructure, open space and green infrastructure.	Residential: 150 dwellings	18	23	21	17	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.

Allocation	Allocation Typology	Scale of Use in Plan Period	Distance to Chilterns Beechwoods SAC (km)	Distance to Epping Forest SAC (km)	Distance to Lee Valley SPA/Ramsar (km)	Distance to Wormley-Hoddesdonp ark SAC (km)	Screening outcome
HEM SA01 Land Southeast of Junction 24 (M25) Strategic Industrial Employment Site	Strategic industrial employment site	Employment floorspace: c.30,000 sqm	28	12	10	6	This site is potentially hydrologically connected to the Lee Valley SPA/Ramsar and is therefore screened in for: • Water quality • Water quantity, level and flow
HEM SA02 St Albans Road Strategic Industrial Employment Site	Strategic industrial employment site	Employment floorspace: up to 187,000 sqm B8 / data centre development	24	15	13	8	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HEM SA03 Borehamwood Industrial Area Extension	Strategic industrial employment site / employment area extension	Employment floorspace: c.82,925 sqm	24	17	15	12	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HEM SA04 Extension to Lismirrane Industrial Park	Strategic industrial employment site / employment area extension	Employment floorspace: c.39,781 sqm	22	21	19	17	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HEM SA05 Land northeast of Elton Way, Bushey, WD25 8HB	Strategic industrial employment site	Employment floorspace: c.45,000 sqm	18	24	22	18	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.
HEM SA06 Former Mercure Hotel and Land to the East	Strategic industrial employment site	Employment floorspace: c.137,410 sqm data centre floorspace	18	23	21	19	This allocation is screened out for all impact pathways as it is outside of the Zol for all Habitats Sites.

Appendix C LSE Screening of Policies

Table 4. Screening of Policies

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy HBF1 Delivering a Better Future for Hertsmere (Spatial Strategy)	Strategic policy establishing the overall spatial strategy for the Borough. The policy directs development towards Regeneration Nodes in Borehamwood and Potters Bar, Growth Nodes associated with the four main towns, and the proposed new settlement at Bowman's Cross. It supports the delivery of housing, employment, town centre, leisure, cultural, community and infrastructure development over the plan period, including strategic urban extensions and other allocated growth locations. The policy also supports small-scale housing development within the four main towns and seeks to secure the infrastructure necessary to accommodate planned growth.	Likely Significant Effects This strategic policy facilitates growth across the Borough through the delivery of housing, employment and supporting infrastructure. Potential impact pathways include recreational pressure on Wormley-Hoddesdonpark Woods SAC and water quality and water quantity impacts on Lee Valley SPA/Ramsar. These pathways have been screened in for further consideration through the assessment of site allocations and associated growth. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy HQD1 Delivering High Quality Design in Hertsmere	A strategic development management policy which requires all development proposals to follow a design-led approach. The policy seeks to secure high-quality, sustainable and inclusive development by ensuring proposals respond positively to local character, landscape, biodiversity, heritage, amenity, climate change, infrastructure and local distinctiveness. The policy establishes overarching design principles that apply to all forms of development across the Borough and promotes successful and sustainable placemaking.	No Likely Significant Effects. This is a management policy which provides guidance and controls on the design and delivery of development. Whilst it applies to development proposals across the Borough, it does not in itself allocate land, identify development locations or result in additional development beyond that already provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD2 Inclusive and Welcoming Design	A non-strategic development management policy which seeks to ensure that development achieves high standards of inclusive, accessible and equitable design. The policy requires proposals to provide safe, welcoming and accessible environments for all users, including accessible housing, inclusive public realm, equitable access to facilities and appropriate adaptation of heritage assets. The policy also requires Inclusive Design Statements and sets accessibility requirements for residential development.	No Likely Significant Effects. This is a management policy which provides guidance and controls on the design and delivery of development. It does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD3 Public Realm and Connecting Places	A non-strategic development management policy that requires development proposals to deliver high-quality, safe, accessible and well-connected public realm. The policy promotes the design-led approach to public spaces, active travel, public realm enhancement, placemaking, public art, green and blue infrastructure integration, healthy streets principles and the long-term management of publicly accessible spaces. It seeks to improve connectivity between neighbourhoods, open spaces, community facilities and transport infrastructure whilst supporting inclusive and sustainable movement.	No Likely Significant Effects. This is a management policy which provides guidance and controls on the design, delivery and management of public realm associated with development. It does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD4 Optimising Site Capacity	A non-strategic development management policy which seeks to ensure that development proposals make effective and efficient use of land through a design-led approach. The policy requires proposals to optimise site capacity whilst responding positively to local character, infrastructure capacity, environmental constraints, amenity considerations, biodiversity, climate resilience and placemaking objectives. It also requires larger and strategic sites to demonstrate coordinated and comprehensive development through masterplanning, design coding and supporting evidence.	No Likely Significant Effects. This is a management policy which provides guidance and controls on the form, density and design of development. Whilst it seeks to optimise the capacity of development sites, it does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD5 Building Heights	A strategic development management policy that establishes Hertsmere's approach to tall buildings. The policy defines tall buildings, identifies suitable locations through Tall Building Suitability Zones, sets maximum height parameters and requires development proposals to demonstrate high-quality design, positive townscape integration, environmental performance, public realm improvements and appropriate infrastructure provision. The policy also requires consideration of cumulative impacts, heritage, biodiversity, climate resilience, amenity and building safety.	No Likely Significant Effects. This is a management policy which provides guidance and controls on the location, design, scale and environmental performance of tall buildings. Whilst it may influence the form and density of development within suitable locations, it does not allocate land, identify additional development sites or result in development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD6 High Quality Housing Design	A non-strategic development management policy which seeks to secure high-quality residential development across the Borough. The policy establishes requirements relating to internal space standards, amenity provision, accessibility, tenure-neutral design, residential amenity, daylight and sunlight, outdoor space, landscaping, servicing and the overall quality and adaptability of housing development. It applies to new-build housing, conversions, alterations and extensions and seeks to ensure that new homes provide a high standard of accommodation for future occupiers.	No Likely Significant Effects. This is a management policy which provides guidance and controls on the design and quality of housing development. Whilst it applies to residential development, it does not allocate land, identify development locations or provide for additional development beyond that proposed elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy HQD7 Building Alterations and Extensions	A non-strategic development management policy which establishes design and amenity requirements for building alterations, extensions, basement development and light wells. The policy seeks to ensure that alterations and extensions are of a high-quality design, respond positively to local character, protect residential amenity, safeguard heritage assets, and avoid adverse effects on the environment, flood risk, structural stability and the public realm. It also sets criteria for basement development and associated features such as light wells.	No Likely Significant Effects. This is a management policy which provides guidance and controls on building alterations, extensions, basement development and associated works. The policy does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD8 Infill and Backland sites, Garden Land and Amenity Areas	A non-strategic policy which sets out the criteria for the development of infill sites, backland sites, garden land and amenity areas within existing settlements. The policy supports the efficient use of land through appropriately designed development whilst protecting local character, residential amenity, biodiversity, green infrastructure, drainage, trees, open space and access arrangements. It also establishes criteria for development on garden land and communal amenity areas and supports small-scale housing delivery within the existing urban area.	Likely Significant Effects This policy supports the delivery of windfall residential development on infill sites, backland sites, garden land and amenity areas within existing settlements. Although precise locations are not identified, development delivered through this policy could potentially occur within areas linked to Habitats Sites. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy HQD9 Shopfront Design	A non-strategic development management policy which seeks to secure high-quality shopfront design across Hertsmere's town centres, shopping areas and commercial frontages. The policy establishes design requirements for shopfronts, signage, canopies, security measures, public realm integration, accessibility and the protection of historic shopfronts. It seeks to maintain local character, improve townscape quality and support the vitality and viability of shopping areas.	No Likely Significant Effects This is a management policy which provides guidance and controls on the design and appearance of shopfronts, signage and associated features. It does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HQD10 Outdoor Advertisements, Digital Displays and Hoardings	A non-strategic development management policy which establishes design, amenity and public safety requirements for outdoor advertisements, digital displays and hoardings. The policy seeks to ensure that advertisements are appropriately designed, sited and maintained, protect local character and	No Likely Significant Effects A non-strategic development management policy which establishes design, amenity and public safety requirements for outdoor advertisements, digital displays and hoardings. The

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	heritage assets, avoid visual clutter, safeguard amenity and highway safety, and prevent adverse impacts on trees and the public realm.	policy seeks to ensure that advertisements are appropriately designed, sited and maintained, protect local character and heritage assets, avoid visual clutter, safeguard amenity and highway safety, and prevent adverse impacts on trees and the public realm.
Policy HE1 Hertsmere's Historic Environment	A strategic policy establishing the Council's overarching approach to the conservation, enhancement and management of Hertsmere's historic environment. The policy seeks to conserve and enhance designated and non-designated heritage assets and their settings through appropriate design, reuse, interpretation and management. It requires development proposals affecting heritage assets to be supported by proportionate Heritage Statements and ensures that any harm to significance is clearly justified and appropriately mitigated.	No Likely Significant Effects This is a management policy which provides guidance and controls relating to the conservation, enhancement and management of heritage assets and the historic environment. It does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HE2 Designated Heritage Assets	A non-strategic development management policy which sets out the Council's approach towards the conservation, enhancement and management of designated heritage assets, including conservation areas, listed buildings, registered parks and gardens, scheduled monuments and their settings. The policy establishes criteria for assessing development affecting designated heritage assets, including requirements relating to significance, setting, design, archaeology, reuse, repair, demolition and heritage-led regeneration.	No Likely Significant Effects This is a management policy concerned with the conservation, enhancement and management of designated heritage assets and their settings. It does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HE3 Non-Designated Heritage Assets	A non-strategic development management policy which establishes the Council's approach towards the conservation, enhancement and management of non-designated heritage assets. The policy requires development proposals affecting non-designated heritage assets to assess significance, minimise harm, support retention and reuse where appropriate, and ensure that any justified loss is appropriately recorded and mitigated. The policy also supports the identification of additional non-designated heritage assets through evidence-based processes.	No Likely Significant Effects This is a management policy concerned with the conservation, enhancement and management of non-designated heritage assets and their settings. It does not allocate land, identify development locations or result in additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy H1 Meeting Hertsmere's Housing Need	A strategic housing policy which establishes Hertsmere's housing requirement and approach to housing delivery over the plan period. The policy provides for the delivery of at least 16,490 net additional homes, supports strategic allocations, housing growth within the Borough's four main settlements, a new settlement at Bowman's Cross, small site delivery, urban intensification and the provision of affordable and specialist housing. The policy also sets out the Council's approach to housing mix, housing choice and the delivery of inclusive and mixed communities.	Likely Significant Effects This strategic policy supports the delivery of significant levels of housing growth across the Borough and provides the overarching framework for residential development throughout the plan period. As the policy facilitates population growth and associated development, there is potential for linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy H2 Optimising Delivery from Small Urban Sites	A strategic housing policy which seeks to increase housing delivery from small urban sites across the Borough. The policy supports the redevelopment and intensification of small sites, including vacant and underused brownfield land, housing conversions, housing alterations and extensions, and infill and backland development. The policy promotes small-site housing delivery as an important source of housing supply and supports residential intensification within Hertsmere's settlements, subject to design, amenity, infrastructure and environmental safeguards.	Likely Significant Effects This strategic policy facilitates the delivery of additional housing through the redevelopment, conversion and intensification of small urban sites across the Borough. Whilst specific development locations are not identified, the policy is intended to increase housing delivery and population growth within Hertsmere. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy H3 Genuinely Affordable Housing	A strategic housing policy that establishes the Borough's approach to the delivery of genuinely affordable housing. The policy requires major residential developments to provide affordable housing, sets affordable housing targets and tenure requirements, establishes mechanisms for viability assessment and review, supports inclusive and mixed communities, and seeks to maximise the delivery of affordable housing across Hertsmere through both market and subsidised development.	No Likely Significant Effects This is a management policy concerned with the tenure, mix and delivery of affordable housing within residential developments. The policy does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy H4 Accommodation for Older People	A non-strategic housing policy which seeks to meet the accommodation needs of Hertsmere's ageing population through the delivery of adaptable mainstream housing, specialist older persons' accommodation and care accommodation. The policy establishes criteria relating to accessibility, location, tenure mix, affordable housing provision, design quality, access to services and the suitability of accommodation to meet the needs of older residents.	Likely Significant Effects This policy supports the delivery of specialist accommodation and housing for older people. Whilst specific development sites are not identified, the policy facilitates additional residential accommodation and associated population growth within the Borough. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy H5 Supported and Specialised Accommodation	A non-strategic housing policy which supports the delivery, retention and appropriate management of supported and specialised accommodation to meet identified needs within the Borough. The policy establishes criteria relating to location, tenure, design quality, accessibility, community integration, care provision and the protection of existing supported accommodation. It seeks to ensure that supported and specialised accommodation is delivered in suitable locations and contributes positively to inclusive and mixed communities.	• Loss of functionally linked habitat Likely Significant Effects This policy supports the delivery and retention of supported and specialised accommodation and therefore facilitates additional residential accommodation within the Borough. Whilst specific development sites are not identified, the policy supports development that may contribute to population growth and associated demands on infrastructure. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy H6 Housing with Shared Facilities/ Homes in Multiple Occupation	A non-strategic housing policy which manages the provision, retention and location of Houses in Multiple Occupation (HMOs), supported and shared accommodation, and large-scale purpose-built shared living developments. The policy seeks to ensure that this form of accommodation contributes positively to housing choice, meets identified need, avoids harmful concentrations, protects local amenity and secures high-quality accommodation and management standards.	Likely Significant Effects This policy supports the provision and retention of HMOs and other forms of shared residential accommodation within the Borough. Whilst specific sites are not identified, the policy facilitates residential accommodation and population growth through the delivery of additional housing provision. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy H7 Self and Custom Build Housing	A non-strategic housing policy which sets out the Council's approach towards self-build and custom-build housing. The policy supports the maintenance of a self-build register, identifies how need will be monitored, and establishes criteria for the assessment of self-build and custom-build housing proposals, including design quality, affordable housing contributions and compliance with the spatial strategy.	No Likely Significant Effects This is a management policy concerned with the provision of self-build and custom-build housing and the monitoring of identified need. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy H8 Gypsy and Traveller Accommodation	A non-strategic policy which supports the delivery of Gypsy and Traveller accommodation to meet identified needs within the Borough. The policy establishes requirements for the provision of pitches and associated facilities, including access, servicing, amenity provision, infrastructure, design quality,	Likely Significant Effects

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	public health and safety considerations. The policy also references the allocation of land within the Local Plan to meet identified accommodation needs.	This policy supports the delivery of Gypsy and Traveller accommodation and identifies a need for additional permanent pitches within the Borough. The policy facilitates residential accommodation and associated population growth through the delivery of new pitches and related infrastructure. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy H9 New Homes in the Countryside/ Green Belt	A non-strategic housing policy which sets out the Council's approach towards speculative small-scale housing development within the countryside and Green Belt outside the Borough's four main towns. The policy supports appropriately located housing proposals which contribute towards identified housing needs, are of a high-quality design, support mixed communities and are delivered in a timely manner. The policy resists major housing development in the countryside and Green Belt that would conflict with the Spatial Strategy.	Likely Significant Effects This policy supports the delivery of additional housing development within the Borough through small-scale residential proposals in the countryside and Green Belt. Although specific development locations are not identified, the policy facilitates residential development and associated population growth. The following impact pathways are present: • Recreational pressure • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy EC1 Meeting Hertsmere's Economic Needs	A strategic economic policy which supports the growth and diversification of Hertsmere's economy through the protection and expansion of employment opportunities, including the film and television industry, logistics, data centres, green industries, office development and other employment uses. The policy supports business growth, employment land provision, workforce training and the delivery of infrastructure necessary to support economic development.	Likely Significant Effects This policy supports the delivery of new housing development within the Borough through small-scale housing proposals in the countryside and Green Belt. Although specific development locations are not identified, the policy facilitates residential development and associated population growth. The following impact pathways are present: • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy EC2 Protecting Employment Land and Delivering New Workspace	A strategic economic policy which establishes Hertsmere's Employment Land Hierarchy and seeks to safeguard, intensify and expand employment land and floorspace across the Borough. The policy sets employment floorspace and land requirements, supports industrial, office, logistics, film industry and data centre development, protects designated employment areas from inappropriate change of use, and directs employment growth to locations identified within the Employment Land Hierarchy.	Sites. Likely Significant Effects This policy facilitates the delivery of new employment floorspace, industrial development, office accommodation, logistics uses, film industry development and data centres across the Borough. The policy identifies employment growth requirements, employment land provision and intensification opportunities and therefore has the potential to facilitate development and associated infrastructure provision. The following impact pathways are present: • Atmospheric Pollution • Water quality • Water quantity, level and flow • Loss of functionally linked habitat
Policy EC3 Delivering High Quality Employment Sites and Workspaces	A non-strategic policy which seeks to secure high-quality employment development across the Borough. The policy establishes design, operational, environmental and amenity requirements for Class E(g), B2, B8 and related sui generis employment uses. It promotes flexible workspace, high-quality working environments, biodiversity enhancement, urban greening, sustainable drainage, water efficiency and provision for small and medium enterprises.	No Likely Significant Effects This is a management policy which provides guidance and controls on the design, layout and operation of employment development. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC4 Affordable Workspace	A strategic policy which seeks to secure the provision, retention and long-term management of affordable workspace within employment developments across the Borough. The policy establishes affordable workspace requirements for major commercial development, sets out criteria for on-site and off-site provision, viability assessment requirements, management arrangements and mechanisms for securing affordable workspace through planning obligations.	No Likely Significant Effects This policy is concerned with the provision, retention and management of affordable workspace within commercial and employment developments. Whilst it applies to employment development, it does not allocate land, identify development locations or increase the quantum of employment development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC5 Strategic Level Employment Sites/ Designations	A non-strategic employment policy which seeks to safeguard and manage Hertsmere's strategic employment sites. The policy supports appropriate employment uses within designated Key Employment Sites and Employment Areas, protects their continued employment function and supports the retention and intensification of strategic employment activities, including film and television industries, logistics, servicing industries, waste management and nationally important infrastructure.	No Likely Significant Effects This is a management policy concerned with the protection, safeguarding and operation of existing strategic employment sites. It does not allocate land, identify new development

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		locations or increase the quantum of employment development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC6 Local Level Employment Sites/ Designations	A non-strategic employment policy which seeks to safeguard and manage Main Employment Areas and Locally Significant Employment Sites identified within Hertsmere's Employment Land Hierarchy. The policy protects these locations for employment-generating uses, supports industrial intensification, manages the location of employment uses within the hierarchy and resists inappropriate non-employment development that would undermine their employment function.	No Likely Significant Effects This is a management policy concerned with the protection, safeguarding and operation of existing employment sites and designations. It does not allocate land, identify new development locations or increase the quantum of employment development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC7 Rural Employment Areas	A non-strategic employment policy which establishes the approach towards designated Rural Employment Areas. The policy supports employment uses that are ancillary to existing rural employment activities, requires compliance with Green Belt policy and seeks to safeguard existing rural employment land whilst resisting inappropriate alternative uses, particularly new residential development.	No Likely Significant Effects This is a management policy concerned with the safeguarding and operation of existing Rural Employment Areas. It does not allocate land, identify new development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. The policy primarily restricts development and protects existing employment uses in rural locations. There are no linking impact pathways to Habitats Sites.
Policy EC8 Hertsmere's Non-Designated Employment Sites	A non-strategic employment policy which seeks to safeguard and manage non-designated employment sites outside the Borough's designated employment areas. The policy supports the retention of viable employment uses, encourages employment-led mixed-use redevelopment in appropriate locations, seeks to maximise industrial capacity, and establishes criteria for the release of employment land where continued employment use is no longer viable. It also requires affordable housing provision where residential development is considered acceptable.	No Likely Significant Effects This is a management policy concerned with the protection, retention and redevelopment of existing non-designated employment sites. Whilst limited mixed-use redevelopment may be supported in some circumstances, the policy primarily safeguards existing employment land and manages the circumstances under which alternative uses may be permitted. It does not allocate land, identify new development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC9 Workplace Training and Job Opportunities	A non-strategic policy which seeks to improve access to employment, skills, apprenticeships and workplace training opportunities for Hertsmere residents. The policy requires major development proposals to contribute towards local labour, training and employment initiatives through financial	

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	contributions and Employment and Skills Plans. It also supports the recruitment of local labour and the use of local businesses during construction and operational phases of development.	No Likely Significant Effects This is a management policy which seeks to secure training, skills development and employment opportunities associated with development. Whilst the policy applies to major development proposals, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC10 The Rural Economy	A non-strategic policy which supports the continued operation and diversification of rural businesses, agricultural enterprises and equine uses within the countryside and Green Belt. The policy seeks to protect agricultural land, support appropriate farm diversification, manage the re-use of rural buildings, support equine development and encourage sustainable agriculture and food growing, whilst ensuring compatibility with Green Belt policy and the rural character of the area.	No Likely Significant Effects This is primarily a management policy which seeks to support and regulate existing rural economic activities, agricultural diversification and the reuse of rural buildings. Whilst limited development may arise through farm diversification and building re-use proposals, the policy does not allocate land, identify development locations or facilitate strategic growth beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC11 Town Centres at the Heart of Hertsmere's Communities	A strategic policy which seeks to maintain and enhance the vitality, viability and resilience of Hertsmere's town centres. The policy supports high-quality public realm, sustainable movement, green and blue infrastructure, mixed-use centres, cultural and community activity, environmental improvements and the adaptation of town centres to changing economic and social circumstances.	No Likely Significant Effects This is a management policy which provides guidance and controls relating to the function, quality and operation of town centres. Whilst the policy supports the vitality and viability of town centres, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC12 Hertsmere's Town Centre Network and Hierarchy	A strategic policy which establishes Hertsmere's town centre network and hierarchy and sets out the Borough's "town centre first" approach to development. The policy directs main town centre uses to designated centres, applies the Sequential Test and Retail Impact Assessment requirements, identifies the hierarchy of centres across the Borough and seeks to maintain and enhance the vitality and viability of those centres. It also supports the delivery of the spatial strategy through the appropriate distribution of retail, commercial, community and service uses.	No Likely Significant Effects This is a management policy which establishes the town centre hierarchy and sets out the framework for assessing proposals for main town centre uses. Whilst it supports the vitality and viability of town centres, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. Any growth associated with town centres is assessed through the

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		spatial strategy, site allocations and settlement-specific policies. There are no linking impact pathways to Habitats Sites.
Policy EC13 Optimising the Use of Town Centre Land and Floorspace	A strategic policy which seeks to optimise the use of land and floorspace within town centres and edge-of-centre locations. The policy supports mixed-use development, redevelopment, intensification, reconfiguration of existing buildings and the incorporation of residential uses within town centres. It promotes higher-density development, efficient use of previously developed land and the integration of commercial, community and residential uses within Hertsmere's centres.	Likely Significant Effects This policy supports the redevelopment, intensification and mixed-use development of sites within town centres. The policy specifically supports additional residential development, the reconfiguration of existing buildings and the intensification of land use within highly accessible locations. Although specific sites are not identified, the policy facilitates development and population growth within Hertsmere's town centres. The following impact pathways are present: • Atmospheric Pollution • Water quality • Water quantity, level and flow • Recreational Pressure
Policy EC14 Hertsmere's Main Town Centre and Local Town Centre	A strategic policy which seeks to maintain and enhance the vitality, viability and retail function of Hertsmere's Main and Local Town Centres. The policy establishes Primary Shopping Areas, supports appropriate main town centre uses, applies Shopping Area Impact Statements, manages the mix of uses within shopping frontages and provides a framework for residential development within town centres. It also supports regeneration, redevelopment and intensification in town centre locations where consistent with the role and function of the centre.	No Likely Significant Effects This policy primarily provides a framework for managing the mix, distribution and function of uses within designated town centres and Primary Shopping Areas. Whilst it references residential development and mixed-use schemes, these are principally delivered through the Spatial Strategy, settlement policies and specific site allocations assessed elsewhere in the HRA. The policy does not itself allocate land or establish additional development requirements beyond those already provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC15 Hertsmere's District Centres	A non-strategic policy which seeks to maintain and enhance the vitality, viability and function of Hertsmere's District Centres. The policy establishes requirements relating to Primary Shopping Areas, the protection of retail and service uses, the provision of active frontages, support for small and independent businesses, the management of changes of use and the retention of main town centre functions within District Centres.	No Likely Significant Effects This is a management policy which provides guidance and controls on the mix, distribution and operation of uses within

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		District Centres. Whilst the policy supports the vitality and viability of centres and manages changes of use, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC16 Hertsmere's Smaller Centre and Individual Shops	A non-strategic policy which seeks to protect and support smaller retail centres, shopping parades, neighbourhood centres and individual shops across Hertsmere. The policy safeguards local retail provision, manages changes of use, protects active frontages and supports continued access to day-to-day goods and services within local communities. It also establishes criteria for the loss of retail units and promotes the retention of local shopping facilities where possible.	No Likely Significant Effects This is a management policy concerned with the protection, retention and operation of existing local centres, shopping parades and retail units. Whilst the policy provides a framework for the assessment of changes of use and supports the continued provision of local services, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC17 Concentration of Harmful Uses	A non-strategic policy which seeks to manage the concentration of specific sui generis uses, including hot food takeaways, betting offices, vape shops, payday loan shops, drinking establishments and similar uses. The policy establishes thresholds and assessment criteria to protect amenity, public health, public safety, town centre vitality and local character. It also sets requirements for food and drink uses and associated health impact considerations.	No Likely Significant Effects This is a management policy which regulates the concentration, distribution and operation of specific town centre and commercial uses. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC18 Public Houses	A non-strategic policy which seeks to protect, retain and where appropriate re-provide public houses within Hertsmere. The policy establishes a presumption in favour of retaining public houses with community, cultural, heritage or economic value, sets criteria for assessing proposals involving loss or redevelopment, requires evidence of viability and marketing, and supports new public houses where they improve access to community facilities and contribute to sustainable neighbourhoods.	No Likely Significant Effects This is a management policy concerned with the protection, retention, reuse and replacement of existing public houses and associated community facilities. Whilst the policy supports new public houses in certain circumstances, it does not allocate land, identify development locations or increase the quantum of

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC19 Markets	A non-strategic policy which seeks to protect, retain and enhance existing markets and market spaces within Hertsmere and support the provision of new markets where appropriate. The policy promotes a town centre first approach for market provision, safeguards existing markets, supports temporary and meanwhile uses, and establishes criteria to ensure markets contribute positively to town centre vitality, small business opportunities, local character and the public realm.	No Likely Significant Effects This is a management policy concerned with the protection, operation and location of markets and market spaces. Whilst the policy supports the provision of new markets in appropriate circumstances, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy EC21 Visitor Accommodation	A non-strategic policy which supports the provision of serviced visitor accommodation, including hotels, bed and breakfasts, hostels, serviced apartments and other visitor accommodation. The policy establishes locational, design, accessibility and operational requirements for visitor accommodation, seeks to ensure it is appropriately located within or close to town centres, prevents the loss of housing stock, and manages the relationship between visitor accommodation and surrounding uses.	Likely Significant Effects This policy supports the delivery of new visitor accommodation within the Borough. Although specific development locations are not identified, the policy facilitates new built development and associated increases in visitor accommodation capacity. The following impact pathways are present: • Atmospheric Pollution • Water quality • Water quantity, level and flow • Recreational Pressure • Loss of Functionally Linked Habitat
Policy SCI1 Safeguarding and Securing Social and Community Infrastructure	A strategic policy which seeks to safeguard, enhance and secure the delivery of social and community infrastructure across Hertsmere. The policy requires development to address infrastructure needs arising from growth, supports the delivery of new and expanded community facilities, protects existing infrastructure from loss, and ensures that infrastructure is delivered in a timely manner alongside development through direct provision, off-site provision or developer contributions.	No Likely Significant Effects This policy supports the delivery of social and community infrastructure required to serve planned growth within the Borough. Whilst the policy facilitates the provision of infrastructure and community facilities, it does not itself allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. Infrastructure provision arises as a consequence of growth already assessed through the Spatial Strategy, housing, employment and allocation policies.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy SCI2 Delivering High Quality Social and Community Infrastructure	A non-strategic policy which supports the delivery, expansion, alteration and improvement of social and community infrastructure across the Borough. The policy establishes design, accessibility, management and operational requirements for community facilities and promotes co-location, shared use, community hubs and the efficient use of public and community assets. It also seeks to ensure that facilities are appropriately managed, maintained and accessible to the communities they serve.	There are no linking impact pathways to Habitats Sites. No Likely Significant Effects This is a management policy concerned with the design, delivery, operation and management of social and community infrastructure. Whilst it supports new and improved community facilities, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. Any growth associated with community infrastructure provision arises as a consequence of development already provided for through the Spatial Strategy, site allocations and other growth policies. There are no linking impact pathways to Habitats Sites.
Policy SCI3 Delivering Sports, Recreation and Play Spaces	A non-strategic policy which seeks to protect, enhance and provide sports, recreation and play facilities across the Borough. The policy supports the retention and improvement of existing facilities, requires new housing development to provide play space, establishes standards for formal and informal recreation provision, and seeks to ensure that sports, recreation and play facilities are accessible, inclusive and appropriately maintained.	No Likely Significant Effects This policy seeks to secure sports, recreation and play facilities as supporting infrastructure for existing and future communities. Whilst it supports the provision of new and enhanced recreation facilities, it is primarily a management policy which responds to growth already provided for elsewhere in the Local Plan. The policy does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SCI4 Nurseries and Childcare Facilities	A non-strategic policy which supports the provision of nurseries and childcare facilities across the Borough. The policy establishes criteria relating to location, accessibility, highway impacts, amenity, design quality and operational requirements. It also sets requirements for proposals involving childcare provision within existing residential properties and seeks to ensure that facilities are appropriately located and designed to meet identified needs.	No Likely Significant Effects This is a management policy concerned with the provision and operation of nurseries and childcare facilities. Whilst it supports childcare provision where a need is identified, it does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SCI5 Burial Spaces	A non-strategic policy which seeks to ensure that sufficient burial provision is available to meet the current and future needs of Hertsmere's communities. The policy supports the safeguarding of existing cemeteries and burial grounds, the expansion of existing facilities and the provision of new burial	

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	capacity where an identified need exists. It establishes criteria relating to accessibility, environmental impacts, biodiversity, heritage, hydrogeology and supporting infrastructure.	No Likely Significant Effects This policy supports the safeguarding, expansion and provision of burial space and associated facilities to meet identified needs within the Borough. Whilst proposals for new burial provision may arise, the policy does not allocate land, identify specific development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. Any proposals brought forward under this policy would be subject to project-level assessment where appropriate. There are no linking impact pathways to Habitats Sites.
Policy GI1 Hertsmere's Green and Blue Infrastructure Network	A strategic policy which seeks to protect, enhance, restore and expand Hertsmere's green and blue infrastructure network. The policy promotes habitat connectivity, biodiversity recovery, landscape protection, ecological resilience, urban greening, sustainable drainage, climate resilience and improved access to green and blue infrastructure. It requires development proposals to integrate green infrastructure into site design and avoid fragmentation of strategically important ecological networks.	No Likely Significant Effects This is a protection and enhancement policy which seeks to safeguard, strengthen and expand Hertsmere's green and blue infrastructure network. The policy promotes biodiversity conservation, habitat creation, ecological connectivity and environmental enhancement. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI2 Hertsmere's Watercourses and Blue Infrastructure	A strategic policy which seeks to protect, restore and enhance Hertsmere's watercourses, rivers, chalk streams and wider blue infrastructure network. The policy requires development proposals to safeguard riparian corridors, enhance aquatic habitats, improve ecological connectivity, support natural flood management, protect water quality, promote river restoration and de-culverting, and integrate biodiversity, recreation and environmental improvements into waterside development.	No Likely Significant Effects This is a protection and enhancement policy concerned with the conservation, restoration and management of watercourses, chalk streams and blue infrastructure. The policy seeks to improve ecological conditions, water quality, habitat connectivity and biodiversity value across the Borough. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI3 Local Nature Recovery Strategy	A strategic policy which supports the implementation of the Hertfordshire Local Nature Recovery Strategy (LNRS). The policy seeks to avoid harm to biodiversity, support habitat creation, restoration and enhancement, improve ecological connectivity and deliver a coherent Nature Recovery Network	No Likely Significant Effects

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	across the Borough. It requires development proposals to contribute towards nature recovery priorities and biodiversity enhancement opportunities identified within the LNRS.	This is a protection and enhancement policy concerned with biodiversity conservation, habitat creation, ecological restoration and nature recovery. The policy seeks to conserve and enhance ecological networks and support the delivery of the Hertfordshire Local Nature Recovery Strategy. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI4 Protecting and Enhancing Biodiversity, Habitats and Ecological Networks	A strategic biodiversity policy which seeks to protect, maintain and enhance biodiversity, habitats and ecological networks across the Borough. The policy safeguards designated and non-designated sites, protected species, priority habitats, irreplaceable habitats and ecological networks. It requires application of the mitigation hierarchy, delivery of Biodiversity Net Gain, protection of international and national nature conservation sites, and supports the implementation of the Hertfordshire Local Nature Recovery Strategy. It also promotes ecological restoration, habitat creation, species recovery and improved access to nature. .	No Likely Significant Effects This is a protection and enhancement policy concerned with biodiversity conservation, habitat protection, ecological connectivity and nature recovery. The policy seeks to avoid impacts on designated sites and biodiversity interests, improve ecological networks, deliver biodiversity net gain and ensure that impacts on nationally and internationally designated sites are appropriately assessed. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI5 Protection from Environmental Pollution	A strategic environmental protection policy which seeks to prevent and minimise environmental pollution arising from development. The policy addresses air pollution, soil contamination, water pollution, groundwater protection, noise pollution and light pollution. It requires appropriate assessments, mitigation measures and environmental safeguards to ensure that development does not adversely affect human health, the environment or ecological receptors.	No Likely Significant Effects This is a protection and mitigation policy concerned with avoiding, reducing and managing environmental pollution arising from development. The policy seeks to protect air quality, water quality, soils, groundwater, biodiversity, residential amenity and sensitive environmental receptors. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI6 Urban Greening, Trees and Landscaping	A non-strategic policy which seeks to increase urban greening, tree cover, landscaping and biodiversity throughout the Borough. The policy promotes the integration of green infrastructure measures including street trees, green roofs, living walls, SuDS, wildlife habitats, landscaping and biodiversity enhancement. It also establishes requirements relating to tree retention, replacement planting, Urban Greening Factors, Landscape Design Strategies, bat and swift bricks and the long-term management of green infrastructure.	No Likely Significant Effects This is a management policy which seeks to protect, enhance and expand green infrastructure, landscaping, tree cover and biodiversity throughout the Borough. The policy promotes

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		habitat creation, urban greening, ecological enhancement and biodiversity net gain measures. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI7 Open Space	A strategic policy which seeks to protect, enhance and expand Hertsmere's network of publicly accessible open spaces. The policy safeguards existing open space, requires replacement provision where losses occur, supports the provision of new open space to meet development needs, promotes improvements to the quality, accessibility and connectivity of open spaces, and supports ancillary uses that enhance the function and enjoyment of open space.	. No Likely Significant Effects This is a management policy concerned with the protection, enhancement and provision of open space. The policy seeks to safeguard existing open spaces and ensure that appropriate open space provision is delivered alongside development already proposed elsewhere in the Local Plan. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy GI8 Communal Gardens and Food Growing	A non-strategic policy which seeks to protect existing allotments and community gardens and promote new opportunities for food growing within the Borough. The policy supports allotments, community gardens, orchards and other food-growing initiatives, safeguards existing provision from loss, and sets requirements for the design, accessibility, management and long-term maintenance of food-growing spaces within new development.	No Likely Significant Effects This is a management policy concerned with the protection, enhancement and provision of allotments, community gardens and other food-growing spaces. The policy seeks to safeguard existing provision and encourage opportunities for food growing as part of healthy and sustainable communities. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
GI9 Geodiversity	A non-strategic policy which seeks to conserve, enhance and improve understanding of Hertsmere's geodiversity resource. The policy protects designated geodiversity sites, Regionally Important Geological Sites and other geological assets, requiring development proposals to avoid harm where possible and secure appropriate mitigation or compensation where impacts cannot be avoided.	No Likely Significant Effects This is a management policy concerned with the protection and enhancement of geodiversity assets and geological features. The policy seeks to safeguard geological interests and improve understanding of the Borough's geodiversity resource. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy SDI1 Responding to the Climate Emergency	A non-strategic policy which seeks to conserve, enhance and improve understanding of Hertsmere's geodiversity resource. The policy protects designated and non-designated geological assets, including Regionally Important Geological Sites, and requires development proposals to avoid harm where possible and secure appropriate mitigation or compensation where impacts cannot be avoided.	No Likely Significant Effects This is a management policy concerned with the protection and enhancement of geodiversity assets and geological features. The policy seeks to conserve geological interests and improve understanding of the Borough's geodiversity resource. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI2 Sustainable Design and Retrofitting	A strategic policy which seeks to improve the environmental performance and sustainability of development across Hertsmere. The policy requires Sustainable Design Statements, promotes the achievement of recognised sustainability standards such as BREEAM and the Home Quality Mark, supports sustainable retrofitting of existing buildings and encourages improvements in energy efficiency, environmental performance and climate resilience.	No Likely Significant Effects This is a management policy which establishes sustainability and environmental performance requirements for development proposals. The policy promotes sustainable design, energy efficiency, environmental enhancement and climate change mitigation measures. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI3 Managing Heat Risk	A strategic policy which seeks to minimise the impacts of overheating and the urban heat island effect through the design of buildings and spaces. The policy requires development proposals to incorporate passive cooling measures, minimise reliance on air conditioning, provide Energy Statements for major developments and integrate urban greening, shading and climate resilience measures into development proposals.	No Likely Significant Effects This is a management policy which establishes requirements relating to climate resilience, overheating and urban heat island mitigation. The policy seeks to improve the environmental performance of development and reduce the impacts of climate change. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI4 Minimising Green House Gas Emissions	A strategic policy which seeks to minimise greenhouse gas emissions from development and support the transition to a net zero-carbon Borough. The policy requires major developments to reduce operational carbon emissions, achieve net zero-carbon outcomes, prepare Energy Strategies, minimise energy demand, consider embodied carbon, and where necessary provide off-site carbon	No Likely Significant Effects This is a management policy which establishes carbon reduction, energy efficiency and sustainability requirements for

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	offsetting measures. It also promotes energy efficiency through the application of recognised standards and guidance.	development proposals. The policy seeks to reduce greenhouse gas emissions and improve environmental performance but does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI5 Improving Air Quality	A strategic environmental protection policy which seeks to protect and improve air quality across Hertsmere. The policy requires development proposals to minimise air pollution, avoid deterioration in air quality, reduce exposure of sensitive receptors, provide Air Quality Assessments where appropriate, and implement suitable mitigation measures. The policy also addresses impacts during construction and operational phases of development and requires consideration of cumulative air quality effects.	No Likely Significant Effects This is a management policy concerned with the protection and improvement of air quality and the mitigation of environmental effects arising from development. The policy seeks to minimise pollution, protect sensitive receptors and ensure compliance with relevant air quality standards. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI6 Energy Infrastructure	A strategic policy which seeks to ensure that development is supported by appropriate and sustainable energy infrastructure. The policy promotes connection to decentralised heat networks, requires feasibility assessments for heat network connections, supports future energy infrastructure planning, requires consideration of electricity network capacity, promotes low-carbon energy solutions and establishes requirements for Energy Statements and energy strategies for major development proposals.	No Likely Significant Effects This is a management policy concerned with the provision, assessment and delivery of energy infrastructure required to support development. The policy promotes sustainable energy supply, energy efficiency and low-carbon infrastructure but does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI7 Minimising and Managing Flood Risk	A strategic policy which seeks to minimise and manage flood risk from all sources across the Borough. The policy requires the application of the Sequential and Exception Tests where appropriate, the preparation of Flood Risk Assessments, the protection of floodplains and watercourses, the incorporation of flood mitigation measures, and the delivery of flood-resilient development that remains safe throughout its lifetime.	No Likely Significant Effects This is a management policy concerned with flood risk avoidance, mitigation and resilience. The policy seeks to reduce flood risk, safeguard floodplains, protect watercourses and ensure that development is designed and located appropriately in relation to flood risk. It does not allocate land,

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI8 Water Supply and Wastewater	A strategic policy which seeks to ensure that development is supported by adequate water supply, wastewater and drainage infrastructure. The policy supports the provision and expansion of water and wastewater infrastructure, requires assessment of network capacity, promotes water efficiency, requires sustainable drainage and foul drainage strategies, protects groundwater resources and Source Protection Zones, and seeks to ensure that development does not adversely affect water quality or water resources.	No Likely Significant Effects This is a management policy concerned with the delivery, protection and operation of water supply, wastewater and drainage infrastructure. The policy seeks to ensure that development is supported by adequate infrastructure capacity, protects water resources and groundwater quality, promotes water efficiency and requires mitigation of potential impacts on the water environment. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI9 Ground Conditions	A strategic policy which seeks to ensure that contaminated land and sites affected by hazardous substances are appropriately assessed, remediated and managed. The policy requires risk assessments, site investigations, remediation strategies and verification measures where necessary to ensure development is safe for future occupiers and does not adversely affect human health, public safety or the environment.	No Likely Significant Effects This is a management policy concerned with land contamination, hazardous substances and environmental protection. The policy requires the investigation, remediation and management of contaminated land and associated risks but does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI10 Reducing and Sustainably Managing Waste	A strategic policy which seeks to ensure that waste is managed sustainably across the Borough through the application of the waste hierarchy and circular economy principles. The policy safeguards strategic waste sites, supports waste management infrastructure where an identified need is demonstrated, protects existing waste management capacity, and establishes criteria for new waste facilities, including environmental protection, carbon performance and amenity considerations.	No Likely Significant Effects This is a management policy concerned with the sustainable management of waste, protection of existing waste infrastructure and delivery of waste facilities required to meet identified needs. The policy does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy SDI11 Securing a Circular Economy	A strategic policy which promotes the application of circular economy principles to development and seeks to reduce waste generation during construction and occupation. The policy requires major development to minimise waste, provide appropriate recycling and waste storage infrastructure, support resource efficiency and ensure that waste management facilities are integrated into development design.	No Likely Significant Effects This is a management policy concerned with waste reduction, recycling, resource efficiency and the sustainable management of waste arising from development. The policy seeks to improve environmental performance and does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy SDI12 Minerals Consultation Area	A non-strategic policy which identifies the Minerals Consultation Area and requires development proposals within that area to consider their impact on mineral resources and future mineral extraction. The policy seeks to safeguard mineral resources from sterilisation, requires engagement with the Mineral Planning Authority and ensures that development does not prejudice future mineral working.	No Likely Significant Effects This is a management policy concerned with safeguarding mineral resources and ensuring that development does not prejudice future mineral extraction. The policy does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy TR1 Sustainable Transport and Movement	A strategic transport policy which seeks to integrate land use and transport planning across the Borough. The policy promotes sustainable transport, active travel, public transport use and improvements to transport infrastructure. It requires development proposals to support sustainable movement, protect transport infrastructure, assess transport impacts, mitigate adverse effects on the transport network and support modal shift away from private car use.	No Likely Significant Effects This is a management policy concerned with the operation, protection and improvement of Hertsmere's transport network and associated infrastructure. The policy promotes sustainable travel, public transport, walking and cycling, and seeks to mitigate transport impacts arising from development. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy TR2 Transport Requirements for New Developments	A strategic transport policy which promotes the Healthy Streets Approach and requires development proposals to prioritise walking, cycling and public transport. The policy seeks to improve public realm, active travel infrastructure, accessibility, connectivity and the quality of the transport environment, whilst requiring Healthy Streets Assessments, transport mitigation measures and improvements to walking and cycling networks.	No Likely Significant Effects This is a management policy concerned with the design, accessibility and transport performance of development proposals. The policy promotes sustainable transport, healthy

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		streets, walking, cycling and public realm improvements and seeks to mitigate transport impacts arising from development. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy TR3 Parking	A non-strategic transport policy which establishes Hertsmere's approach to parking provision, car-free and car-lite development, cycle parking, controlled parking zones, electric vehicle charging and parking design. The policy seeks to manage parking demand, support modal shift towards sustainable transport, improve accessibility and ensure that parking provision is integrated appropriately within development proposals.	. No Likely Significant Effects This is a management policy concerned with the provision, design and management of parking and associated transport infrastructure. The policy seeks to encourage sustainable travel patterns, manage parking demand and support the implementation of sustainable transport objectives. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy TR4 Deliveries, Services and Construction	A non-strategic transport policy which seeks to ensure that development proposals appropriately accommodate deliveries, servicing, freight movement and construction logistics. The policy promotes sustainable freight movement, requires adequate servicing arrangements, supports delivery and servicing plans, encourages consolidation facilities and seeks to minimise impacts on the transport network, local amenity and public realm.	. No Likely Significant Effects This is a management policy concerned with the movement of freight, deliveries, servicing and construction logistics associated with development. The policy seeks to manage operational impacts arising from development already provided for elsewhere in the Local Plan and does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy TR5 Taxis and Private Hire Vehicles	A non-strategic transport policy which sets out the criteria for offices, taxi ranks and operational facilities associated with taxis and private hire vehicle businesses. The policy seeks to ensure that such facilities are appropriately located, do not adversely affect amenity or the highway network, are accessible and safe for users, and provide suitable operational and charging infrastructure.	. No Likely Significant Effects This is a management policy concerned with the location, design and operation of facilities associated with taxis and private hire vehicles. The policy provides guidance and controls for development proposals but does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		There are no linking impact pathways to Habitats Sites.
Policy TR6 Digital Connectivity	A strategic policy which seeks to improve digital connectivity across Hertsmere by supporting the provision of full-fibre broadband, telecommunications infrastructure and associated digital infrastructure. The policy requires new development to be connection-ready, supports improvements to digital connectivity in underserved areas, and establishes design, siting and environmental requirements for telecommunications equipment and associated infrastructure.	No Likely Significant Effects This is a management policy concerned with the provision, design and operation of digital connectivity infrastructure and telecommunications equipment. The policy seeks to improve digital connectivity and ensure that associated infrastructure is appropriately located and designed. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy TR7 Airspace Safeguarding	A strategic policy which seeks to safeguard the operational integrity and safety of airspace associated with Elstree Aerodrome, Heathrow Airport and RAF Northolt. The policy requires consultation with relevant airport operators and safeguarding bodies, protects aerodrome operations and associated infrastructure, and ensures that development does not compromise the safe operation of civil or military aviation facilities.	No Likely Significant Effects This is a management policy concerned with safeguarding airspace, aerodrome operations and aviation safety. The policy establishes consultation and assessment requirements for development proposals within identified safeguarding areas but does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HBA1 Borehamwood Principal Location for Growth	A strategic policy establishing Borehamwood as the principal focus for housing-led growth, regeneration and infrastructure investment within Hertsmere. The policy supports residential-led mixed-use development, regeneration opportunities, intensification of previously developed land and investment in supporting infrastructure..	No Likely Significant Effects This policy includes proposed site allocations including location and quantum of development. The assessment of these allocations in Appendix B demonstrates that there are no linking impact pathways to Habitats Sites as the growth locations are outside the zones of influence of the relevant Habitats Sites..
Policy HBA2 Borehamwood Town Centre Regeneration	A strategic policy which supports the regeneration and renewal of Borehamwood Town Centre through residential-led mixed-use development, public realm improvements, active frontages, town centre uses, infrastructure improvements and enhanced walking, cycling and public transport connections.	No Likely Significant Effects This is a management policy which establishes design, regeneration and placemaking requirements for Borehamwood

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
		Town Centre. It supports the coordinated regeneration of the town centre but does not in itself allocate land or identify development beyond that provided for through site allocations and other Local Plan policies. There are no linking impact pathways to Habitats Sites.
Policy HBA3 Elstree Way Employment Corridor	A strategic place-based policy which establishes the Elstree Way Employment Corridor as a mixed-use regeneration area linking Borehamwood Town Centre, employment areas, civic facilities and surrounding neighbourhoods. The policy supports residential-led mixed-use redevelopment, employment growth, creative industries, community infrastructure, public realm improvements and enhanced walking, cycling and public transport connections. It seeks to ensure that development contributes to the coordinated regeneration of the wider corridor.	. No Likely Significant Effects This policy includes proposed site allocations including location and quantum of development. The assessment of these allocations in Appendix B demonstrates that there are no linking impact pathways to Habitats Sites as the growth locations are outside the zones of influence of the relevant Habitats Sites.
Policy HBA4 Sustainable Movement and Connectivity in Borehamwood	A strategic place-based policy which seeks to improve sustainable movement and connectivity across Borehamwood. The policy promotes walking, cycling, wheeling and public transport, supports improvements to the station gateway, public realm and movement corridors, and requires development proposals to contribute towards sustainable travel infrastructure, transport mitigation and coordinated movement networks within the town.	. No Likely Significant Effects This is a management policy which seeks to improve sustainable movement, connectivity and accessibility within Borehamwood. The policy promotes active travel, public transport improvements and transport infrastructure required to support growth already provided for elsewhere in the Local Plan. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HBA5 Green Infrastructure and Landscape Setting	A strategic place-based policy which seeks to protect, enhance and extend Borehamwood's green and blue infrastructure network. The policy requires development to safeguard parks, open spaces, trees, habitats, watercourses and landscape features, improve ecological connectivity and access to open space, provide green infrastructure to support growth, and protect the landscape setting of Borehamwood through landscape-led design and mitigation measures.	No Likely Significant Effects This is a management policy concerned with the protection, enhancement and delivery of green and blue infrastructure associated with development. The policy seeks to protect biodiversity, open space, landscape character and ecological networks and to mitigate the environmental effects of growth already provided for elsewhere in the Local Plan. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy HPBA1 Potters Bar Town Centres	A strategic policy which establishes Darkes Lane and the High Street as the primary focus for housing-led mixed-use regeneration, town centre renewal and public realm improvement within Potters Bar. The policy supports residential-led mixed-use development, town centre regeneration, employment renewal, public realm improvements, sustainable movement and infrastructure delivery within Potters Bar's town centres and opportunity areas..	There are no linking impact pathways to Habitats Sites. Likely Significant Effects This policy includes proposed site allocations including location and quantum of development. The assessment of these allocations in Appendix B demonstrates that there is a linking impact pathway of recreational pressure to Wormley-Hoddesdonpark Woods SAC. The policy itself does not lead to development beyond that assessed through the associated site allocations.
Policy HPBA2 Movement and Connectivity in Potters Bar	A strategic policy which seeks to improve sustainable movement and connectivity across Potters Bar. The policy promotes walking, cycling, wheeling and public transport, supports improvements to the railway station, public realm, crossings, active travel infrastructure and sustainable transport connections, and requires development proposals to contribute towards transport mitigation and movement improvements.	No Likely Significant Effects This is a management policy which seeks to improve sustainable movement, connectivity and accessibility within Potters Bar. The policy promotes active travel, public transport improvements and transport infrastructure required to support growth already provided for elsewhere in the Local Plan. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HPBA3 Character, green Infrastructure and Setting	A strategic place-based policy which seeks to protect and enhance the character, heritage, green infrastructure, blue infrastructure and landscape setting of Potters Bar. The policy requires development to safeguard and enhance biodiversity, open spaces, watercourses, landscape features, ecological connectivity, sustainable drainage and green infrastructure networks, whilst ensuring that growth responds positively to local character and environmental constraints.	No Likely Significant Effects This is a management policy concerned with the protection, enhancement and delivery of green and blue infrastructure, biodiversity, landscape character and environmental quality within Potters Bar. The policy seeks to manage and mitigate the impacts of growth already provided for elsewhere in the Local Plan and does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HBUSA1 Bushey Local Centres	A strategic place-based policy which seeks to strengthen Bushey Village, Bushey Heath and other local centres and parades as attractive, accessible and distinctive places serving local communities. The policy supports the vitality and viability of local centres through appropriate mixed-use	No Likely Significant Effects

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	development, public realm improvements, heritage conservation, local services, small-scale workspace, community facilities and active frontages.	This policy includes proposed site allocations including location and quantum of development. The assessment of these allocations in Appendix B demonstrates that there are no linking impact pathways to Habitats Sites as Bushey is outside the identified zones of influence of the relevant Habitats Sites.
Policy HBUSA2 Movement and Connectivity in Bushey	A strategic policy which seeks to improve sustainable movement and connectivity throughout Bushey. The policy promotes walking, cycling, wheeling and public transport, supports improvements to connections between Bushey Village, Bushey Heath, North Bushey, Bushey railway station and neighbouring centres, and requires development proposals to contribute towards sustainable travel infrastructure, accessibility improvements and transport mitigation measures. .	No Likely Significant Effects This is a management policy which seeks to improve movement, accessibility and sustainable transport within Bushey. The policy promotes active travel, public transport improvements and transport infrastructure required to support growth already provided for elsewhere in the Local Plan. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy HRA1 Radlett Centre	A strategic policy supporting the vitality and viability of Radlett Centre through sensitive mixed-use development, infill, refurbishment, town centre enhancement, public realm improvements, active frontages, workspace provision, local services and housing above or alongside centre uses. .	No Likely Significant Effects This policy includes proposed site allocations including location and quantum of development. The assessment of these allocations in Appendix B demonstrates that there are no linking impact pathways to Habitats Sites as Radlett lies outside the identified zones of influence of the relevant Habitats Sites.
Policy DM1 Working with Stakeholders to Deliver the Local Plan	A strategic policy setting out the Council's approach to partnership working, monitoring, implementation and review of the Local Plan. The policy supports collaboration with stakeholders, monitoring of delivery and the use of planning powers to support successful implementation of the spatial strategy.	No Likely Significant Effects This is a management policy concerned with the implementation, monitoring and review of the Local Plan. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
DM2 Infrastructure funding and planning obligations	A strategic policy setting out the Council's approach to partnership working, monitoring, review and implementation of the Local Plan. The policy promotes collaborative working with stakeholders,	No Likely Significant Effects

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
	monitoring of plan delivery and the use of planning powers to support implementation of the spatial strategy.	This is a management policy concerned with the implementation, monitoring and review of the Local Plan. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy DM3 Masterplans and Comprehensive Development	A strategic policy which requires site-wide masterplanning and comprehensive development for strategic allocations and other specified sites. The policy seeks to ensure coordinated delivery, effective land use, infrastructure planning, development phasing, stakeholder engagement and integration with the wider spatial strategy. It establishes requirements for masterplans, delivery strategies and comprehensive planning across larger or more complex development sites.	No Likely Significant Effects This is a management policy concerned with the planning, coordination and delivery of development proposals. The policy establishes requirements for masterplanning, site-wide coordination and delivery strategies but does not allocate land, identify development locations or increase the quantum of development beyond that already provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy DM4 Land Assembly	A non-strategic policy which supports land assembly and, where appropriate, the use of compulsory purchase powers and other statutory powers to facilitate the comprehensive development of land. The policy seeks to support the delivery of the spatial strategy, strategic allocations and wider regeneration objectives through coordinated land assembly and comprehensive planning.	No Likely Significant Effect This is a management policy concerned with the assembly of land and the implementation of development already provided for elsewhere in the Local Plan. The policy establishes mechanisms to facilitate comprehensive development and delivery of site allocations but does not allocate land, identify new development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy DM5 Meanwhile Uses	A non-strategic policy which supports the temporary or meanwhile use of vacant land and buildings where this would provide beneficial economic, community, cultural or other appropriate uses pending permanent redevelopment. The policy establishes criteria for temporary uses, seeks to ensure that they do not prejudice allocated development sites or town centre and employment functions, and promotes the productive use of vacant sites and premises.	No Likely Significant Effects This is a management policy concerned with the temporary use of vacant land and buildings pending their permanent redevelopment or occupation. The policy supports interim uses that do not prejudice the delivery of site allocations or the implementation of the Local Plan. It does not allocate land, identify development locations or increase the quantum of development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.

Policy Name	Brief Policy Description	Potential Likely Significant Effect?
Policy DM6 Health Impact Assessments	A non-strategic policy which requires Health Impact Assessments (HIAs) to be submitted for major developments and other forms of development that are likely to have implications for public health and wellbeing. The policy seeks to ensure that health considerations are integrated into the design process and that opportunities to improve health outcomes and reduce health inequalities are identified and addressed through development proposals.	No Likely Significant Effects This is a management policy concerned with the assessment of potential health impacts arising from development proposals. The policy requires Health Impact Assessments to inform the design and assessment of development but does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.
Policy DM7 Monitoring and Review	A non-strategic policy which establishes the monitoring and review framework for the Hertsmere Local Plan. The policy requires annual monitoring through the Authority Monitoring Report (AMR), monitoring of Local Performance Indicators, review of development viability and consideration of policy updates where monitoring indicates that strategic objectives, delivery targets or the spatial strategy are not being achieved.	No Likely Significant Effects This is a management policy concerned with the monitoring, implementation and review of the Local Plan. The policy establishes procedures for assessing performance against plan objectives and responding to changing circumstances through future plan reviews. It does not allocate land, identify development locations or facilitate additional development beyond that provided for elsewhere in the Local Plan. There are no linking impact pathways to Habitats Sites.

