



Hertsmere **Local Plan**

Delivering a better future

Hertsmere Local Plan Regulation 18 Consultation Statement

September 2026

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1. Non-Technical Summary

Hertsmere Borough Council is preparing a new Local Plan to guide development and investment across the borough. Once adopted, the Plan will help determine where new homes, jobs and infrastructure should be located and how Hertsmere's environment, heritage and local character should be protected. This statement explains how the Council consulted on its emerging Local Plan between 16 April and 29 May 2026, summarises the responses received and sets out how that feedback is being considered in the ongoing preparation of the Plan.

How the consultation was carried out

The consultation was an early opportunity for residents, businesses, community groups, landowners, developers, public bodies and other organisations to comment on the Council's proposed approach to growth, potential development sites and emerging planning policies.

The consultation documents could be viewed and responded to online through the Commonplace consultation platform, by email or in writing. Paper copies were also made available at key Council locations.

The Council held seven public information events in South Mimms, Borehamwood, Radlett, Elstree, Shenley, Potters Bar and Bushey. These gave people an opportunity to speak directly to Council officers and ask questions about the proposals. The consultation was also promoted through social media, local newspapers and emails to people and organisations registered on the Council's consultation database.

The consultation generated significant interest. The Council received 4,566 individual responses, as well as 3,904 responses based on templates produced by community organisations.

Feedback received

Every response was recorded, reviewed and divided into individual points so that the issues raised could be properly considered. The most frequently discussed subjects were:

- housing, including the number, type, affordability and location of new homes;
- the potential release of Green Belt or "grey belt" land for development;
- the overall vision for Hertsmere and the proposed approach to distributing growth;
- pressure on roads, public transport, schools, healthcare and other infrastructure;
- the environmental effects of development, including flooding, climate change, biodiversity and the loss of agricultural land;
- the effect of development on the character and identity of towns and villages;
- the design, height and density of new development; and

- the proposed housing and employment sites, particularly those around Radlett and Bowmans Cross.

Many respondents were worried that development could increase traffic and pressure on existing services, result in the loss of green spaces or Green Belt land, increase flood risk, and affect local character, heritage and wildlife. There were frequent calls for infrastructure to be provided before or alongside new development.

Views were not uniform. Some respondents supported the need for more homes, including affordable and accessible housing, and recognised that some Green Belt development may be necessary. There was also support for high-quality and sustainable design, stronger environmental policies, improved walking, cycling and public transport connections, and the creation of new employment opportunities. Others felt that the proposed level or location of growth was unsuitable and should be reconsidered.

The consultation also produced mixed views about individual sites. Some locations were considered accessible and capable of supporting sustainable development, while others attracted objections because of Green Belt status, traffic impacts, limited public transport, environmental constraints or potential effect on nearby communities.

How the feedback is being used

The Council has reviewed the points raised alongside updated technical evidence and national planning requirements. Feedback has been used to:

- reconsider which potential development sites should be taken forward;
- refine the number, type and location of new homes and employment sites;
- strengthen policies covering design, climate change, biodiversity, heritage and infrastructure;
- examine transport, flooding, utilities and public-service capacity in more detail;
- improve the clarity of policies, maps and supporting evidence; and
- identify measures needed to reduce or manage the effects of development; and
- reduce the quantum of Green Belt release required.

Not every concern can be resolved through the Local Plan. The Government requires councils to plan for identified housing and economic needs, and Hertsmere has a limited supply of land that is suitable, available and realistically capable of being developed. This means the Council must make difficult choices, including considering some land that is currently within the Green Belt.

The Local Plan gives the Council an opportunity to coordinate growth, direct it towards the most appropriate locations and ensure that development contributes to infrastructure, affordable housing and environmental improvements. Without an up-to-date Plan, the Council would have less control over where development happens and how it is designed.

What happens next

The Council has used the Regulation 18 consultation feedback and updated evidence to prepare the Regulation 19 Publication Local Plan. This is the version of the Plan that the Council intends to submit for independent examination. It will be published under Regulation 19 so that representations can be made on its legal compliance and soundness.

Following the Regulation 19 Publication period, the Council intends to submit the Local Plan, the representations received and the supporting documents to the Secretary of State under Regulation 22. An independent Planning Inspector will then examine whether the Plan meets the relevant legal and procedural requirements and whether it is sound. Subject to the examination and any necessary main modifications, the Council may then adopt the Local Plan.

2. Introduction

2.1 Purpose of the Statement

- 2.1.1 This Consultation Statement summarises the Regulation 18 consultation undertaken by Hertsmere Borough Council (hereafter referred to as HBC or ‘the Council’) between 16 April and 29 May 2026 on the emerging Local Plan, and the representations received from stakeholders in response to the consultation.
- 2.1.2 The Statement sets out:
- the bodies and persons invited to make representations,
 - how those bodies and persons were consulted,
 - a summary of the main points raised by respondents, and
 - how representations have been considered in progressing the Local Plan.
- 2.1.3 This Statement reflects the regulatory requirements for consultation reporting and aligns with the Council’s [Statement of Community Involvement](#) (SCI).

2.2 Structure of the Statement

- 2.2.1 This Consultation Statement includes seven sections. Section 1 provides a Non-Technical Summary. Section 2 introduces the Statement and sets out its purpose. Section 3 explains the background to the Local Plan. Section 4 explains the Regulation 18 consultation undertaken in 2026. Section 5 summarises the main issues raised by theme and the Council’s response. Section 6 summarises responses by consultee group. Section 7 sets out the conclusions and next steps.
- 2.2.2 Appendix A includes press releases, social media posts, advertisements and other promotion of the Local Plan consultation. Appendix B includes consultation material from the in-person events. Appendix C provides a summary of key information published as part of the consultation. Appendix D provides summaries of the key points made in representations and the Council’s response to each point.

3. Background to the Local Plan

3.1 National Plan-Making Context

- 3.1.1 HBC is preparing a new Local Plan to guide how growth, development and investment will be managed across the borough, under The Town and Country Planning (Local Planning) (England) Regulations 2012¹ and the National Planning Policy Framework 2024. Once adopted, the Local Plan will provide the statutory planning framework for determining planning applications and will identify how future development needs for homes, employment, infrastructure, services, open space and environmental protection will be addressed.
- 3.1.2 The current Hertsmere Local Plan 2012–2027 comprises the Core Strategy, adopted in January 2013; the Elstree Way Corridor Area Action Plan, adopted in July 2015; the Site Allocations and Development Management Policies Plan, adopted in November 2016; and the Policies Map. The Local Plan is now out of date in a number of respects. National planning policy and housing requirements have changed, requiring the Council to prepare a new Local Plan and consider additional sources of housing supply and a range of potential development sites.
- 3.1.3 A new local plan-making system came into force in March 2026. However, transitional arrangements allow legacy Local Plans such as the Hertsmere Local Plan to continue under the 2012 Regulations, provided they are submitted under Regulation 22 by 31 December 2026.
- 3.1.4 Although the Hertsmere Local Plan is being prepared and will be examined under the legacy plan-making system and the applicable transitional arrangements, a new National Planning Policy Framework was published on 17 August 2026. The new Framework includes national decision-making policies which took effect on publication and are material considerations in planning decisions. The Council has therefore reviewed the emerging Regulation 19 Local Plan against the new Framework, including to avoid unnecessary duplication or material inconsistency with national decision-making policies. Annex A of the 2026 NPPF provides that existing development plan policies which are materially inconsistent with the national decision-making policies should be given very limited weight.

3.2 Previous Consultation Stages

- 3.2.1 The Council undertook earlier Regulation 18 consultation and engagement on the emerging Local Plan in 2020/21 and 2024. Those earlier stages were prepared under different national planning policy contexts. Feedback received through those exercises has informed subsequent plan preparation, alongside updated evidence and changes to national policy and housing requirements.
- 3.2.2 Feedback received during the 2024 consultation has been used to inform the development of the 2026 Regulation 18 consultation material, including

¹ Where “Regulation(s)” are referred to in this report by numbers (e.g. Regulation 18, 19 or 22), these references relate to numbered provisions within The Town and Country Planning (Local Planning) (England) Regulations 2012, available here: [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012](#)

the approach to growth, the assessment of reasonable alternatives and the identification of candidate sites.

4. 2026 Regulation 18 Consultation

4.1 Overview

- 4.1.1 The Hertsmere Regulation 18 consultation provides an opportunity for residents, businesses, landowners, prescribed consultation bodies and other stakeholders to comment on the emerging Hertsmere Local Plan, its draft policy direction and potential growth locations before it is refined for the next stage.
- 4.1.2 The Regulation 18 Local Plan, as well as its evidence base and other important documents, can be found on the [Council's Local Plan webpage](#). Appendix C of this consultation statement contains a non-technical summary of the Local Plan.
- 4.1.3 The Regulation 18 consultation opened on 16 April 2026 and closed on 29 May 2026. The Regulation 18 draft and associated consultation represented an early formal stage in the preparation of the new Local Plan, exploring how the borough will grow over time. The consultation sought views on the Council's early ideas for the new Local Plan, including the proposed approach to sustainable growth, potential site options and draft policy themes.
- 4.1.4 The consultation was undertaken at an early stage of Plan preparation so that feedback can be used to inform the next iteration of the Local Plan, the Regulation 19 Draft Plan. Following the close of the consultation, representations were registered and considered by the Council in its preparation of the Regulation 19 version of the Plan, which is due to be published later in 2026.

4.2 Consultation Methods

- 4.2.1 The consultation was promoted through a dedicated online consultation platform, [Commonplace](#). This enabled respondents to review the consultation material and submit comments electronically. Alternatively, respondents were able to submit representations via email or as paper letters.
- 4.2.2 The Local Plan and supporting evidence base are available online through the Council's website, as well as being made available in paper format at the following deposit points across the borough:
- Borehamwood Civic Offices- Elstree Way, Borehamwood, WD6 1WA
 - Borehamwood Library - 96 Shenley Road, Borehamwood, WD6 1EB
 - Elstree and Borehamwood Town Council - Brook Close, Borehamwood, WD6 5BT
 - Potters Bar Oakmere Library - High Street, Potters Bar, EN6 5BZ
 - Potters Bar Wylyotts Theatre and Cinema – Wylyotts Place, Potters Bar EN6 2HZ
 - South Mimms Parish Council - Blanche Lane, South Mimms, EN6 3PD
 - Aldenham Parish Council / Radlett Library - 1st Floor, The Radlett Centre, 1 Aldenham Avenue, Radlett, Hertfordshire WD7 8HL
 - Bushey Library - Sparrows Herne, Bushey, WD23 1FA
 - Shenley Parish Council - 'The Hub', London Road, Shenley, Hertfordshire, WD7 9BS
- 4.2.3 To support participation across the borough, the Council ran seven public information events in the following locations:
- South Mimms (Monday 27 April at South Mimms Village Hall),
 - Borehamwood (on Wednesday 29 April at Borehamwood Civic Centre),
 - Radlett (Thursday 30 April at the Radlett Centre),
 - Elstree (Wednesday 6 May at The Manor Elstree),
 - Shenley (Monday 11 May at Shenley Chapel),
 - Potters Bar (Monday 18 May: Wylyotts Theatre), and
 - Bushey (Tuesday 19 May at St James's Church House).
- 4.2.4 These sessions provided opportunities for residents and stakeholders to discuss the emerging Local Plan with Council officers and ask questions about the consultation materials.



- 4.2.5 Additionally, the Council publicised the consultation via social media and the local press (Borehamwood & Elstree Times, The Herts Advertiser, Watford Observer and Welwyn Hatfield Times). The Council also emailed updates and notifications to consultees registered on its consultation database. The consultation webpage was available at: Have Your Say Today - Hertsmere Local Plan - Commonplace.
- 4.2.6 Event, media and social-media monitoring undertaken during the consultation identified significant levels of community interest and online discussion. A public meeting at the Radlett Centre attracted around 200 attendees—approximately two-thirds of the venue's capacity. Monitoring also identified a series of independently organised community response events across the borough, including three events in Shenley and Potters Bar during a single week. Note that these latter figures relate to third-party social-media content and independently organised events identified through Council monitoring rather than Council-led events. They should not be treated as measures of the Council's own consultation reach or as unique participant numbers.

4.3 Consultation Processing

- 4.3.1 All representations received during the consultation were either collated into a consistent format on Commonplace for processing, or downloaded as emails, or scanned in the case of paper letters. All representations received, regardless of what format they were received in, were assembled in a single coding tool and given a unique identifying number, to ensure no representation was missed.
- 4.3.2 Representations made were then categorised by consultee groups, and points made were tagged with themes and summarised. Where points made represented similar views, these points were tagged to the same summary. The Council then considered and responded to points made in line with these themes and summaries. This process enabled the Council to respond to a large number of representations. The Regulation 18 consultation received a total of 6,374 unique responses from residents and other stakeholders engaging in the Plan for the Borough's future development. 4,049 of these were email template responses and 684 were letter template responses, which were received from residents and based on templates provided by community organisations.
- 4.3.3 To ensure an effective and fair consultation process, and to allow the Council to process and respond to representations, it is important that stakeholders who made representations can be identified. The importance of identifying those making representations will continue at Regulation 19 stage and beyond, to enable the Local Plan Inspector and other relevant parties to develop a full picture of respondents and key themes. This information will feed into examination materials including matters statements.
- 4.3.4 The Council therefore has been unable to accept any representations which do not include at least a name and contact details. However, address details of respondents will not be made publicly available. All personal data will be handled in line with the Council's Privacy Policy. You can view the

[Council's privacy notices](#) as well as [those of its partners](#) helping with the consultation process online.

- 4.3.5 At Regulation 19 Publication stage, representations will be processed and made available in accordance with the 2012 Regulations and the Council's privacy notice. To ensure an open and fair examination, the names of people and organisations making representations must be available to the Inspector and other examination participants. Postal addresses, email addresses, telephone numbers and other contact details will not normally be published. However, the Programme Officer, and where necessary the Planning Inspectorate, will require access to appropriate contact details in order to administer the examination. Personal data will be processed and shared only where there is an appropriate lawful basis and in accordance with the Council's privacy notice and the Planning Inspectorate's privacy arrangements.
- 4.3.6 By submitting a representation, consultees therefore confirm that they agree to this and accept responsibility for their comments. The Planning Inspectorate's privacy statement for local plan examinations is available at: www.gov.uk/government/publications/planning-inspectorate-privacy-notices/customer-privacy-notice.
- 4.3.7 Abusive or otherwise inappropriate language has been redacted from published material. Where a representation contained a substantive planning point capable of being understood separately from the inappropriate content, that point was still considered. Content which could not reasonably be processed because it consisted solely of abusive or inappropriate material was not treated as a substantive planning representation.
- 4.3.8 Names, contact details, and the content of responses themselves have been used to categorise each response into a **respondent category** (see section 5.1 below for more detail), for the purposes of analysis, in line with the Council's Statement of Community Involvement. These categories include residents; businesses; developers, agents and landowners; local interest groups; central and local government departments; prescribed consultation bodies; local community and amenity groups; local service groups; parish and town councils; members of the Local Strategic Partnership; National and County Bodies / Organisations; and neighbouring and other relevant plan-making authorities.
- 4.3.9 Each response processed has been broken down into individual points, so that each matter raised in a representation can be assigned to a relevant theme, sub-theme, sentiment and, where applicable, location.
- 4.3.10 **Themes** align with the structure of the consultation document and include consideration of
- the Local Plan in general terms;
 - the Local Plan process and planning process;
 - the Plan's vision, objectives and spatial strategy;
 - Development management policies on design, heritage, housing (including where this may be located in the green belt), economy, culture, infrastructure including transport, and the environment;

- The borough's specific places and proposed growth sites for housing and employment; and
 - Arrangements for delivery and monitoring.
- 4.3.11 Where appropriate, themes are further split into sub-themes (for instance, representations on the matter of housing may relate to affordable housing need or to the matter of housing land supply etc).
- 4.3.12 For each theme, as appropriate, points made can be classified by **sentiment**, as positive, as neutral or non-sentiment-based observations, as expressing concern, or as expressing opposition to what the Plan is proposing.
- 4.3.13 Summaries of and responses to representations are then provided, for points made which can be grouped together.
- 4.3.14 3,904 template responses were received as part of this consultation. Although often submitted by individuals, the responses were based on a template provided by another individual or organisation, and thus largely similar or identical. Where responses were identified as relating to the same template, they were grouped together. Where points made were altered from the template to such an extent that they could not be grouped and processed together, the responses were treated as "non-templates".

5. Summary by Key Themes, Sentiment and Development Locations

5.1 Overview of Responses Received

5.1.1 Figure 1 below displays the distribution of feedback across the overarching themes that emerged in representations responding to all consultation questions. Some representation summaries provided included points relevant to multiple themes, and so may be counted across several categories. The total number of themed representation summaries is therefore greater than the number of questions responded to in the consultation.

5.1.2 Figure 1 shows that the themes most frequently raised in stakeholder feedback were:

- Housing,
- Green Belt/grey belt and
- Vision, Objectives and Spatial Strategy.

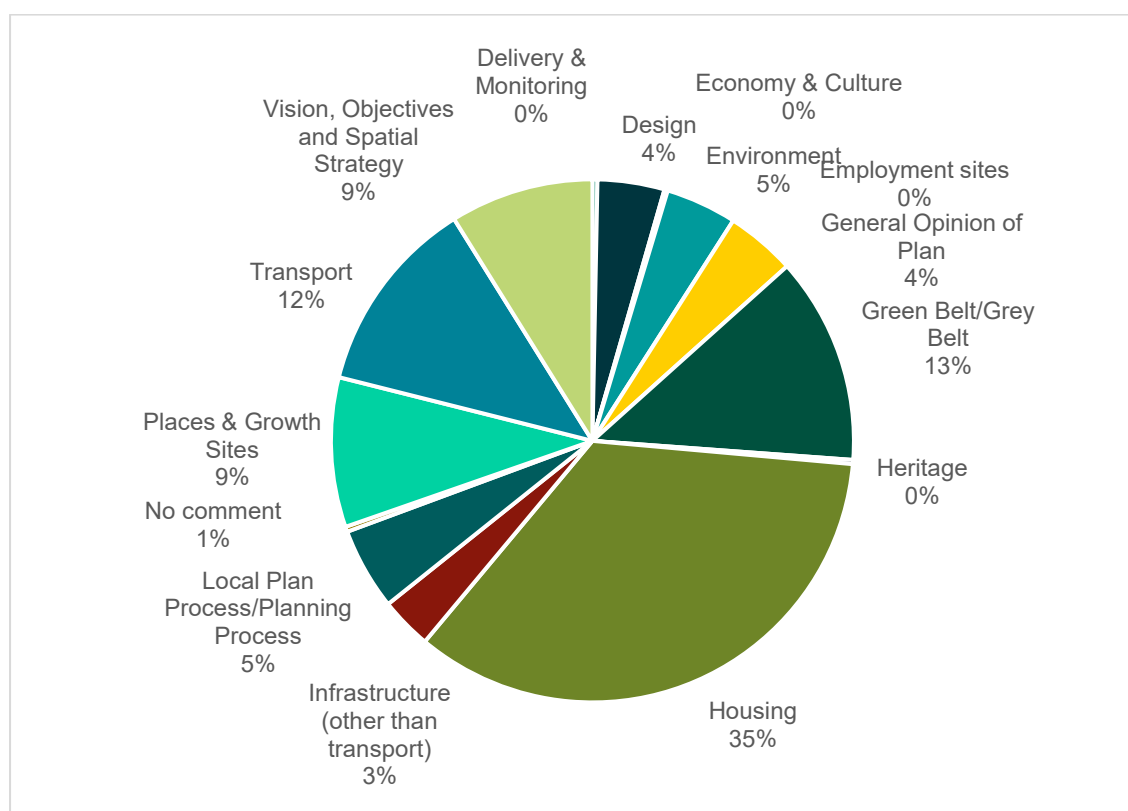


Figure 1: Distribution of feedback across overarching themes

5.1.3 Figure 2 displays the spread of sentiment expressed in representations, with some respondents expressing a range of sentiment within different

aspects of their response. The figure shows that the dominant sentiment evident across stakeholder representations is concern.

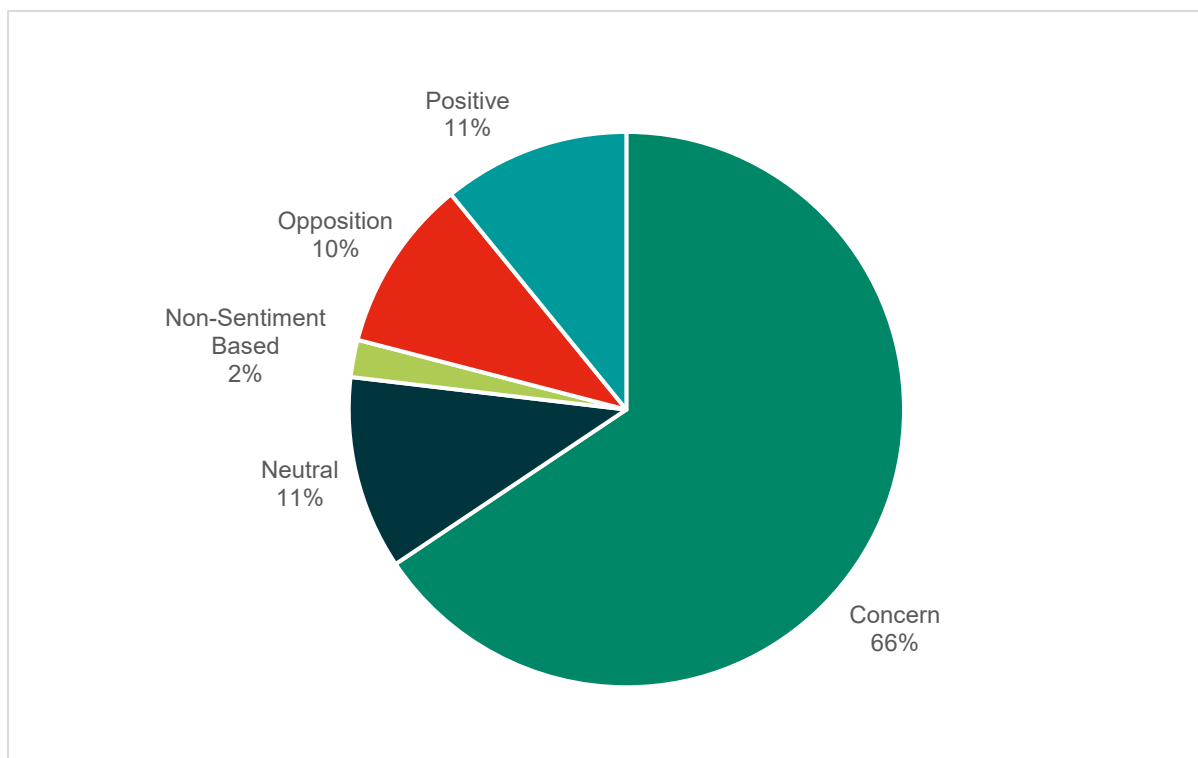


Figure 2: Spread of sentiment across representations

5.1.4 Figure 3 shows the most frequently referenced development locations across the feedback received. The following five site/s were commented on the most frequently in representations:

- HRA SA6 – Home Farm, Radlett;
- HRA SA4 – Land South of Watford Road and West of New Road, Radlett;
- Bowmans Cross;
- HRA SA3 – Land North of Watford Road and East of Kemprow, Radlett; and
- HRA SA7 – Starveacres and land to the west of Starveacres, Radlett.

The 'General' comments refer to representations which do not explicitly mention a specific site but do make reference to a location in general terms.

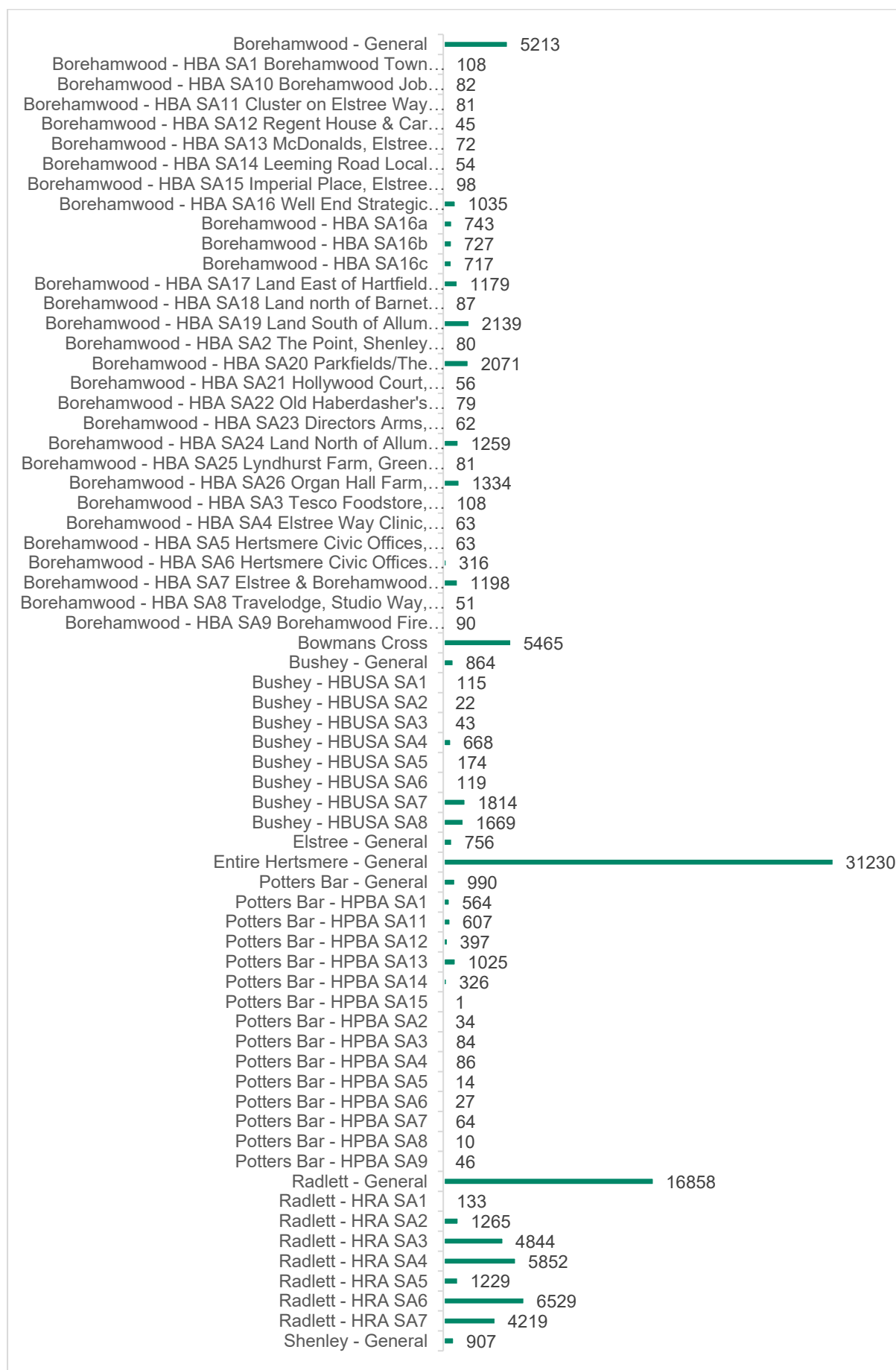


Figure 3: References to development locations

5.2 Key Strategic Themes

- 5.2.1 The key themes that have emerged from feedback have been summarised in Table 1, with each matter raised in representations considered against overarching themes and assigned to sub-themes where appropriate. HBC has provided broad responses to these key, themed aspects raised, where suitable to comment. Please note that more detailed summaries are provided for each point raised in a representation, together with a Council response, in **Appendix D**.

Table 1: Key themes raised in representations and responses from HBC

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
Overarching theme: Delivery and Monitoring		
Delivery	Representations support stronger housing delivery mechanisms and note the need for timely completion of key infrastructure to support housing delivery. Some oppose penalising applicants for delayed implementation due to other factors such as policy and regulation. There is also interest expressed in how developer contributions will be calculated, with support for use of planning obligations to secure scheme specific developer contributions.	The Regulation 19 Local Plan is supported by a housing trajectory setting out anticipated delivery over the plan period. Policy H1 establishes the housing requirement and requires delivery to be kept under review, while Policy DM7 provides the framework for annual monitoring of housing delivery and Local Plan performance.”.
Monitoring	Representations made recommendations for the Plan’s monitoring policy to include certain indicators, including on housing and the environment.	The Council recognises the importance of robust monitoring to track delivery of all key policies and the Plan’s monitoring framework will include indicators covering key housing and environmental matters.
Overarching theme: Design		
Accessible / inclusive design	Support has been voiced for M4 (2) and M4 (3) accessible and adaptable design requirements in the Local Plan.	HBC supports design that is welcoming and inclusive for all Hertsmere residents, removing disproportionate barriers in relation to housing design and travel. It is HBC’s intention to carry these proposed requirements forward into the draft Local Plan, subject to evolving viability considerations.
Building heights	Several respondents raise concerns over the height of proposed developments and	The Regulation 18 feedback illustrated a clear preference for height/density as an alternative to Green Belt release, Local Plan policies and maps on building height will identify appropriate locations for tall buildings,

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	the impact this may have on local character, heritage assets, and groundwater assets. Some feedback suggests identifying broad areas where tall building would be acceptable, rather than setting rigid height parameters for sites. Representations also pointed out that developments exceeding 45.7m will require statutory MOD consultation.	as well as associated definitions and design parameters. This will optimise capacity of suitable, available, and deliverable locations for growth, taking account need for regeneration, capacity of infrastructure, and impact on local character. Inclusion of maximum heights is deemed necessary to safeguard local character and appearance. HBC's aim is to optimise site capacity, particularly of sites located on previously development land and within built up areas, meeting as much development need as possible within settlements and in well serviced locations. Sites located within existing safeguarding areas will be required to consult relevant bodies for development proposals.
Co-location/ mixed-use	Respondents are concerned with the approach towards change of use applications and the promotion of a flexible approach to permissions for change of use.	The Plan will set out clear policies on change of use and mixed-use development, balancing the need for flexibility with protection of existing uses and amenity, in line with the NPPF. Any flexible approach will be based on evidence of need and local circumstances.
Density, capacity and character	Some respondents are concerned that the proposed density of development and infilling could impact upon local character and access to open space. Others supported optimisation of site capacity and meeting housing needs.	Proposals will be required to respect the prevailing character of the local area while effectively and efficiently using limited land supply resources. HBC's aim is to optimise site capacity, particularly on previously developed land and within built up areas, as well as on sites with access to public transport and other infrastructure, aiming to meet as much development need as possible within settlements and in well serviced locations. This is more sustainable, reducing the need to travel and supports the ongoing viability and vitality of settlements and their services. It also minimises the need to release greenfield land for housing. Regarding open space, in line with the NPPF, development is required not to result in the loss of existing open space used for sports, recreation, play, or allotments, unless an assessment clearly shows they are surplus to requirement or the loss can be compensated through new provision. Extensions or alterations to existing dwellings will be expected to make a neutral or positive contribution to the surrounding area.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
Design quality	High-quality design that contributes to local character is favoured for new developments. Other priorities expressed for the design of developments include integration of Secured by Design principles, Active Design principles, and Neighbourhood Plan design codes.	HBC seeks to secure high-quality design for new residential developments in the Borough. It will ensure that all new housing is designed to a high-quality standard, responding to the needs of Hertsmere's resident population. Policies HQD1, HQD2 and HQD3 require development to create safe, inclusive and welcoming places through measures including natural surveillance, appropriate lighting, active frontages and clear relationships between public, communal and private space. Design priorities suggested as part of representations will be considered in the Plan.
Public realm	Concerns are raised around the impact of development on the public realm, highlighting the need for high quality, well connected public spaces.	Local Plan policy will require that development proposals seek to improve the effective functioning and safe use of transport networks and the public realm, including connecting walking and cycling transport infrastructure.
Overarching theme: Economy and Culture		
Delivery	Concerns were raised that the delivery trajectory of proposed employment sites lacks clarity.	The Council has prepared a development trajectory for housing and employment sites. This is based on evidence of market demand, site availability, and infrastructure capacity. The trajectory will be kept under review through annual monitoring, and where necessary, the Council will work with landowners and developers to address any barriers to delivery and respond with flexibility to changing economic circumstances.
Employment land demand/ supply	An array of recommendations were made on this subject, including promoting the provision of more industrial space and of spaces suitable for smaller businesses, expressing support for local film and creative sectors, encouraging more employment land at Bowmans Cross, and requesting greater clarity on requirements for film studio and data centre space.	The Council's policies on employment land are informed by an Economic Study that assesses future employment land needs across different use classes. Conversely, future land supply for economic purposes is considered in the evidence of the Housing and Economic Land Availability Assessment. The Plan will allocate suitable, available and achievable land for employment uses in appropriate locations with good access to the strategic road network, subject to site availability and constraints, including in relation to the environment and infrastructure. The Economic Study considers vacancy rates alongside growth projections and structural changes in the economy. The Plan will provide flexibility to respond to changing demand while protecting viable employment sites. In some cases, vacancies reflect instances where current stock is in need of updating or no longer suitable for modern purposes.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	Some representations also noted there is existing vacant office space, asserting that further office stock is not required.	
Employment land hierarchy / Rural Employment	Feedback notes that Rural Employment Areas are not clear in the plan and queries if there is sufficient support for the rural economy in the Plan, particularly rural diversification.	The Council is committed to supporting a prosperous rural economy in line with NPPF. The Council will seek to provide greater clarity and level of detail in the Regulation 19 Plan on employment matters.
Freight	Concern was raised that the capacity of freight and transport infrastructure may not sufficiently accommodate proposed employment growth.	The Council assesses transport impacts and requirements of proposed employment sites through the Transport Study. Site allocation policies will include requirements for transport assessments and travel plans, and where necessary, require developer contributions towards transport improvements. The Council will work with the Highway Authority and other relevant infrastructure stakeholders to ensure the transport network can appropriately accommodate development.
Sector priorities	Recommendations are made to give greater consideration to higher education, laboratories and scientific facilities as drivers for skills and economic growth, as well as investment in the knowledge-based economy. One response asks for more equestrian space to feature. Concerns are voiced on the impacts of AI on the film industry and the environmental impacts of data centres, also offering limited job creation.	The Council's policies on employment land are informed by an Economic Study that assesses future employment land needs across different uses and use classes, taking into account local specifics and up to date changes and developments where possible.
Town centres	Recommendations propose that there is a need for town centres to be considered not just for housing but continued use of retail,	The Council's approach to town centre development and parking will balance the need to optimise land use for regeneration with maintaining adequate parking to support town centre vitality and commuter

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	employment, parking, and public services, with a need for diverse, quality shops in the borough. Concerns are raised that reduced parking provision in town centres would impact town centre traders.	access, alongside public transport and active travel options. Any reduction in public parking as a result of development proposals will be subject to parking impact assessments and consultation with stakeholders.
Overarching theme: Employment Sites		
General opinion	Mixed opinions are expressed on individual proposed employment sites. Representations emphasised that allocation sites should align with the spatial strategy and NPPF policy.	The Draft Local Plan economic strategy, policies and employment allocations are informed by evidence including the Housing and Economic Development Needs Assessment (HEDNA) and evidence on employment land supply, market demand, and economic trends, in line with national policy and the Local Plan's proposed spatial strategy.
Overarching theme: Environment		
Best and most versatile agricultural land (BMV)	Feedback raises concerns about loss of BMV land and supports developments that avoid BMV.	The Council recognises the importance of protecting BMV for food production. The Plan follows the approach set out in the NPPF, which requires significant development of agricultural land to use areas of poorer quality in preference to higher quality land. This is taken account of in site assessment evidence supporting the Plan. Where development of BMV land is necessary to meet identified needs for housing and employment, this will be justified through evidence, and the Plan will seek to minimise such loss where possible.
Climate change	Concerns are widespread that proposed growth could worsen climate change impacts. Support is noted for several climate change policies, including renewable energy generation, heat network connection, water efficiency targets, significant tree planting and application of circular economy principles, although some representations acknowledge that it can be	The Council is committed to addressing climate change through the Local Plan. As policies are developed, the Council will consider requirements for development to incorporate measures to reduce carbon emissions, manage flood risk through sustainable drainage systems, provide green infrastructure to manage urban cooling, and protect/enhance green spaces, subject to consideration of viability and other relevant constraints. The Plan's climate change policies are designed to ensure development contributes to climate change mitigation and adaptation in accordance with the NPPF.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	difficult to support growth whilst applying climate mitigations. Embodied carbon assessments are costly, so a suggestion is made to only require these on a representative sample of buildings. Representations suggest that the Plan's sustainable design policies could give greater weight to nature-based solutions and could require applicants to explain how environmental and climate interventions have informed the scheme design from the outset.	The Council will ensure, including through its whole plan viability assessment, that policy requirements are proportionate, do not impose unreasonable costs, and are appropriate to the scale and nature of development.
Designated sites	Requests are made for greater evidence of consideration of designated sites and impacts on protected habitats specific to Hertsmere.	The Council will ensure that the Plan includes comprehensive references to designated sites and protected habitats specific to Hertsmere, including Local Wildlife Sites, Local Nature Reserves, and habitats of principal importance. Policies will provide appropriate protection for these sites and require relevant assessments where development may affect them, in accordance with national policy and legislation.
Ecology	Recommendations are made for updates to Policy GI4, including strengthened requirements for Biodiversity Net Gain and enhancement of nature recovery. Development should demonstrate alignment with the Hertfordshire Local Nature Recovery Strategy. Representations state that Ecological Assessments are needed where important habitats or notable species are likely impacted. Long-term monitoring and management are also raised as important considerations.	The Council recognises the value of biodiversity and habitats. The Council will take on board the comments made, particularly by the Environment Agency as a prescribed consultation body, alongside other feedback and considerations, when drafting the Plan's policy relating to ecology and biodiversity, alongside national policy and legislation and relevant evidence, including an Infrastructure Delivery Plan, Green Belt Study, Sustainability Appraisal, Habitats Regulations Assessment, and Strategic Flood Risk Assessment.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	Responses raise concerns about housing development causing loss of habitat and trees, particularly where there are environmental sensitivities.	
Flooding and flood risk	Flood risk is a frequent topic raised, with concerns about loss of flood plains for development increasing flood risk. Responses emphasise the need for protection of Source Protection Zones and groundwater and for maintaining the Regulation 18 Local Plan approach to flood zone classification. A response also suggests Sustainable Urban Drainage requirements. Representations also assert that requirements for Strategic Flood Risk Assessments should be correctly carried out, considering updated climate change allowances. Feedback on Policy GI2 advises specific expectations on buffer zone designation and management, with support noted for buffers 2,3 and 4 of GI2. Detailed feedback is provided on the Water Framework Directive and requirements for assessing developments that affect waterbodies. A standalone water quality policy is recommended, as well as a strategic approach on how development prioritises	The Council will take on board the comments made by the Environment Agency as a statutory consultee, alongside other feedback and considerations, when drafting this policy alongside national policy and legislation and relevant evidence, including evidence from the Hertsmere Strategic Flood Risk Assessment commissioned by the Council.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	different environmental outcomes for watercourses.	
Health impacts	Several recommendations are made for specific health related strategies to be considered in the Plan's Health and Wellbeing chapter. The Council is asked to set out Health Impact Assessment requirements, focusing on developments with significant potential impacts, Air Quality Focus Areas, and health-sensitive uses. Health requirements of a development should also consider the Joint Strategic Needs Assessment and support delivery of health strategies. Specific policy recommendations are made, which include early engagement with the NHS and health partners ahead of the Regulation 19 stage, use of design and assessment tools to demonstrate how developments support healthy places and lives, active travel components to support physical health, safe and inclusive public spaces, sustainable developments that support air quality and health impacts from climate change, access to a healthy food environment, access to the natural environment, and suitable healthcare infrastructure.	The Council is committed to promoting healthy communities through the Local Plan. Policies will require development to support healthy lifestyles through provision of green spaces, active travel infrastructure, access to healthcare and community facilities, and healthy design principles. The Plan's approach is informed by health impact considerations and engagement with public health partners, including the NHS, and will take into account representations made. The Infrastructure Delivery Strategy also provides specific evidence on health infrastructure, underpinning policy development, which is based on consideration of the strategies, plans and evidence produced by relevant partners, including the NHS and County Council, and engagement with these bodies.
Pollution	Pollution related concerns highlight the risk of light pollution, air quality, and historic landfill on certain allocation sites.	The Council welcomes support expressed in representations. The Plan will include policies requiring development to minimise pollution through appropriate design and other measures. The Plan is supported by an Air Quality Assessment and associated monitoring data, which identifies constraints and mitigation

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	Submission of Preliminary Risk Assessments with planning applications is supported.	requirements in relation to pollution. On sites with historic uses that imply contamination, appropriate mitigation, such as land remediation, will be required.
Waste management	Proposed growth must consider capacity to accommodate waste management.	The Council considers waste management capacity through the Infrastructure Delivery Plan and will work with waste management providers to ensure capacity can accommodate growth.
Overarching theme: General opinion of plan		
Concern	Some general objections are voiced about the Local Plan, Spatial Strategy, policies, and proposed allocations.	Objections to the Local Plan are noted but HBC is bound by national policy and legislation, as well as by the results of technical evidence, which directs what the Council is able to propose. The plan-making process has included evidence gathering, strategic options assessment, Sustainability Appraisal, Habitats Regulations Assessment, and Regulation 18 consultation on the Draft Local Plan, and will progress through consideration of representations, preparation of the Regulation 19 Publication version and taking into account of representations on soundness matters, submission to the Planning Inspectorate, examination in public, and adoption. The Council will carefully consider all feedback raising concerns about the plan-making process, including concerns about allocations, methodology, evidence base, consultation approach, assessment of alternatives, legal compliance, procedural matters, or alignment with national policy on cooperation across boundaries and with strategic stakeholders, and will reflect on to the content of the emerging local plan to ensure full compliance with legal and procedural requirements and best practice. The Council remains committed to transparency, rigour, and responsiveness throughout the plan-making process, ensuring that all representations are given due consideration, that the evidence base is comprehensive and robust, and that the Local Plan is prepared in accordance with statutory requirements and capable of being found sound and legally compliant at examination. .
General comment	General comments note that development should be compliant with Neighbourhood Plan provisions.	The Council supports Neighbourhood Plans as an important part of the development plan. Compliance with Neighbourhood Plans, where they form part of the statutory development plan for a place, are already secured through national policy and legislation.
Support	Some general support is given to the Local Plan, Spatial Strategy, policies, and proposed allocations.	The Council welcomes support for the Plan. The Council is committed to preparing a sound, legally compliant, and community-supported Local Plan that meets the development needs of Hertsmere whilst protecting and enhancing the environment, heritage, and quality of life for current and future generations.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
Overarching theme: Green Belt/ grey belt		
Green Belt/ grey belt	The Green Belt and grey belt are notable topics raised frequently in feedback. Some responses acknowledge the need to redesignate and build on some Green Belt land if this helps to meet housing needs, including for affordable homes. Other representations are concerned the proposed approach could risk undermining the spatial strategy and enable cumulative development in the Green Belt. Some representations voice concerns around the approach and conclusions of the Green Belt Assessment. The methodologies employed by neighbouring authorities' assessments are also recommended for consideration to avoid inconsistencies. Some preference is expressed for a brownfield-first approach. There is further concern that the sites close to built-up areas have not been assessed against Green Belt purposes. Some caution is noted around designating grey belt and potential grey belt where it may undermine the NPPF. There are recommendations that the definition and identification of grey belt land must be clearer.	The Council's spatial strategy minimises Green Belt loss through prioritising brownfield land, optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated, in line with national policy, legislation and guidance. Given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is likely necessary. The Local Plan is supported through a Green Belt Assessment. The Plan and evidence follow the approach set out in NPPF and PPG on protecting Green Belt land and will take in account representations when drafting policy and finalising evidence for Regulation 19 stage.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
Overarching theme: Heritage		
Conservation Areas	Feedback notes concerns around potential impact of development on conservation areas and their settings.	The Council recognises conservation areas as important heritage assets and requires development to preserve or enhance their significance, character, and setting, in line with national policy. Policy HE1 (Hertsmere's Historic Environment), HE2 (Designated Heritage Assets) and HE3 (Non-Designated Heritage Assets) state that proposals must respect local scale, design, materials, views, and townscape quality, be supported by Heritage Impact Assessments (HIA) where necessary, and avoid harm unless clearly justified and outweighed by public benefits. Development affecting conservation areas will be carefully assessed in consultation with heritage stakeholders and specialists to ensure high-quality, heritage-sensitive design.
Heritage Impact Assessments	Recommendations are made to complete Heritage Impact Assessment (HIA) for proposed allocations at Regulation 19. This would inform site assessment, selection and capacity testing to justify allocations, and assess the potential effects on heritage assets and inform appropriate design and layout mitigations. Any necessary mitigation and enhancement measures identified should be secured through the site-specific policy wording.	The Council will screen for potential heritage impacts on site allocations, carrying out HIA on all sites where potential impacts are identified. HIA will inform allocation policies on mitigation requirements.
Listed buildings	There is some concern raised about the impact of the Plan on listed buildings and their setting.	The draft Local Plan policies seek to protect listed buildings and their settings by ensuring development conserves and enhances Hertsmere's historic environment. Proposals affecting heritage assets must be supported by a proportionate Heritage Statement and assessed against relevant legislation and policy. Development causing substantial harm to, or loss of, a designated heritage asset will be avoided and only be permitted where it is necessary to deliver substantial public benefits or meets the applicable national policy tests.
Other heritage assets	Consideration should be given to impacts on heritage assets beyond listed buildings and conservation areas, including the historic character of villages.	The draft Local Plan includes policies to minimise the impact of development on non-designated heritage assets and their setting. The Council will support the identification of additional non-designated heritage assets through local listing, neighbourhood planning, conservation area appraisal, development management and other evidence-based processes. Where a proposal would directly or indirectly harm or result in the loss of significance of a non-designated heritage asset, a balanced judgement will be made

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
		having regard to the scale of harm or loss, the significance of the asset and the public benefits of the proposal.
Overarching theme: Housing		
Housing need	General support is given for housing targets and affordable housing provision, although there is mixed feedback on the use of the standard method for determining housing need. Requests are made for suitable delivery across family housing and vulnerable groups, with some opposition to Houses in Multiple Occupation and second homes. There is also opposition to new housing accommodating residents from outside the borough, though others note it could support unmet need in neighbouring authorities. Some respondents oppose payment in lieu instead of on-site affordable housing. Some feedback discusses scheme viability with the affordable housing requirements, with concern for the fact that developers may claim development is unviable and reduce percentage provisions post-consent. Clarity on the definition of 'genuinely affordable housing' is also requested.	HBC's Local Plan, in line with national policy and guidance, has to plan to meet its housing requirement in full to be found legally 'sound' at examination. This is based on identified housing land supply, associated constraints, and the standard method housing need, which in turn is founded on a baseline of local housing stock and affordability of housing. The standard method provided by government must be used to determine the starting point or minimum annual local housing need figure when preparing a local plan. Local Planning Authorities can only adopt an alternative method to assessing housing need if exceptional or specific local circumstances justify this. Housing stock provides a stable and predictable baseline that ensures all areas, as a minimum, are contributing a share to meet the national total need for housing, proportionate to the size of their current housing market. Consideration of affordability is included to ensure homes are built where people wish to live and are able to find work. Housing affordability is considered to ensure homes are built where people want to live. As household numbers naturally grow through demographic change, and as more people wish to make their home in Hertsmere, this is reflected in local house prices and rents and thus affordability. The Plan will emphasise on-site delivery of affordable housing on major sites, unless in exceptional circumstances. A cascade approach would only be used where it is not possible to deliver on-site affordable housing, prioritising off-site delivery on an alternative site, or a final option for a payment in lieu of exceptional circumstances only. The Plan will reflect development viability through its Whole Plan Viability Assessment, identifying what percentage of affordable provision can be supported without endangering delivery of new homes. In line with the NPPF, planning applications will be assumed to be viable with the required percentage of affordable housing provision and it will be up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Where a developer

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
		seeks to alter affordable housing commitments after planning permission is granted, this will have to happen through a viability review, in line with national policy and guidance. Policy at Regulation 19 will seek to provide greater clarity on what is meant by genuinely affordable housing in the Hertsmere context, and how it will be the focus for delivery.
Housing supply	Some concerns are raised as on whether quantity of housing takes priority over quality and sustainability, with suggestions to reduce total delivery. Representations query the housing trajectory to meet requirements and the approach to housing land supply. Representations assert that the Council needs to allocate sufficient deliverable sites to meet housing requirements in the early part of the Plan period. The Council's past housing delivery performance is commented on.	HBC seeks to secure high-quality design for new residential development in the Borough. It will ensure that all new housing is designed to a high-quality standard, responding to the needs of Hertsmere's residential population. The Plan's housing trajectory has been prepared using information on delivery provided by promoters and landowners for candidate sites. To provide certainty over the housing trajectory the Council will undertake further engagement with landowners, site promoters and developers during the Regulation 19 publication to provide a robust evidence base for housing supply across the plan period. The draft Local Plan seeks to improve the Council's housing land supply position from the point of adoption to avoid speculative development across Hertsmere. The Council is seeking a stepped housing trajectory in the first five years of the plan period to ensure that housing delivery can be scaled up during this period and the Housing Delivery Test results can be improved, which will contribute to a better housing land supply position for the Borough over the Plan period.
Overarching theme: Infrastructure (other than transport)		
Delivery and funding	Feedback notes that viability assessments should assume developments will provide both land and funding for construction of new infrastructure and highlights that social infrastructure is crucial to be delivered alongside new development. Differing feedback has been received on whether proposed developer contributions	The Draft Local Plan is supported by an Infrastructure Delivery Plan (IDP) that identifies the infrastructure required to support growth, address capacity constraints, and create sustainable communities. Prepared in collaboration with infrastructure providers and stakeholders, the IDP sets out infrastructure needs, costs, delivery timescales, and funding sources. Infrastructure will be delivered through a combination of developer contributions, government funding, local authority investment, and service provider funding. Policy DM2 will provide a framework for securing infrastructure through planning obligations, including phasing and trigger points where necessary, to ensure essential infrastructure is delivered before or alongside development, and Part 4 of the emerging Local Plan sets out infrastructure will be delivered through securing developer contributions, CIL and S106 payments. The Council will work closely with developers and infrastructure providers, monitor delivery and

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	for infrastructure investment are too high or too low. Concern is expressed around the level and timing of infrastructure upgrades required to facilitate development.	funding throughout the plan period, and update the IDP as required to ensure infrastructure remains viable, coordinated, and aligned with development.
General opinion	General view that infrastructure delivery is essential to support growth and housing should not be developed before key infrastructure is in place.	The Draft Local Plan is supported by an Infrastructure Delivery Plan (IDP) that assesses existing infrastructure capacity, identifies the infrastructure needed to support planned growth, and sets out delivery priorities in collaboration with key infrastructure providers and stakeholders. The Regulation 19 Local Plan addresses infrastructure delivery principally through Policy DM2 (Infrastructure Funding and Planning Obligations), Policy SCI1 (Safeguarding and Securing Social and Community Infrastructure), the Infrastructure Delivery Plan and relevant site-allocation policies. Policy DM3 also provides for comprehensive masterplanning and coordinated infrastructure delivery on large or complex sites. The Council will work closely with infrastructure partners, monitor capacity and delivery throughout the plan period, and ensure that infrastructure is delivered in a coordinated and timely manner to support sustainable growth. Phasing is considered as part of the IDP.
Green and blue infrastructure	Green/ blue infrastructure is commented on, with general support for green and blue infrastructure to be treated as environmental constraints, also noting that environmental requirements, such as habitat creation and climate adaptations, should be embedded before layouts are fixed and should be enforced with supporting frameworks and strategies. Support is given for on-site provision rather than off-site contributions, and representations assert that on-site provision should contribute to wider ecological connectivity. Further detailed recommendations are given for Policies	The Council welcomes support for the green infrastructure policies in the Draft Local Plan. The Regulation 19 Local Plan addresses these matters through Chapter 10, Green and Blue Infrastructure, particularly Policies GI1, GI3, GI4, GI6 and GI7, which address the green and blue infrastructure network, the Local Nature Recovery Strategy, biodiversity, urban greening and trees, and open space. The Draft Local Plan recognises that green infrastructure provides multiple benefits including biodiversity enhancement, climate resilience, flood mitigation, and accessible recreation opportunities. The Council is committed to ensuring green infrastructure is embedded within development and that Hertsmere's natural environment is protected and enhanced for current and future generations. Policy GI1 (Hertsmere's Blue and Green Infrastructure) requires development to protect and enhance environmental assets through the provision of high-quality green infrastructure, biodiversity net gain, sustainable drainage systems, and the protection of trees and hedgerows. Major developments must be supported by appropriate ecological, arboricultural, landscape, and green infrastructure strategies, with long-term management secured through planning conditions and legal agreements. The Council will work with developers and environmental partners to ensure these measures

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	GI1, GI2, GI3, and GI4, GI5, and GI6, covering topics such as buffer zones, management arrangements, retention and increase in trees and canopy cover, features to protect, and application of 20% BNG as the policy expectation. Feedback warns that development at high density may put greater pressure on existing green infrastructure.	are effectively delivered and maintained, supporting environmental enhancement across Hertsmere. Viability will also be considered through the whole plan viability assessment, to ensure requirements from development are not onerous.
Social infrastructure	Social infrastructure is widely commented on. Emphasis has been placed on the need for delivery and improvement of social infrastructure alongside development, with no net loss of local services or impacts to existing residents from construction. The next version of the Plan is recommended to identify strategic allocations to deliver social infrastructure needs for the community. Recommendations are made for the provision of sports facilities, community facilities, and healthcare infrastructure and a broadening of Policy SCI3 to cover sport and recreation, and developments should be designed to encourage active movement and that Hertsmere Playing Pitch Strategy Action Plan should be adhered to. Concern has been raised that Policy SCI1 is not effective, with greater flexibility required for redundant sites.	The Draft Local Plan recognises that timely infrastructure delivery is essential to support sustainable development and new communities. Policy SCI1 provides the principal framework for safeguarding and securing social and community infrastructure, supported by Policy SCI2, Policy SCI3, Policy DM2, the Infrastructure Delivery Plan and relevant site-allocation policies. The Council will consider requirements for on-site sports provision for allocations where the Outdoor Sports and Playing Pitch Study (2026) has identified a need for on-site provision and continue to engage with Sports England in relation to open space and sports provision on site allocations. Policy SCI1 (Safeguarding and Securing Social and Community Infrastructure) allows for the disposal of surplus social and community infrastructure sites where there is clear evidence that they are no longer needed or where the disposal forms part of a public sector disposal programme. The Council supports flexibility to enable genuinely redundant sites to be reused for alternative community purposes or to help fund improvements to healthcare services and will consider clarifying associated policy wording. The Council works with Hertfordshire County Council to assess education needs arising from development and secure appropriate contribution. Education contributions are calculated using established methodologies that consider factors such as pupil yield, school capacity, projected demand, and the cost of providing additional school places. The Council is committed to making the best use of infrastructure assets and retaining existing infrastructure assets so they can best contribute to meeting future needs.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	There are also requests for clarity on the methodology used for developer contributions to education and the location of new schools.	
Utilities infrastructure	Feedback states that increased provision of high-speed broadband should be required, as well as concern whether existing utilities infrastructure can accommodate new housing capacity.	The Council recognises that high-quality digital infrastructure including high-speed broadband and full fibre connectivity is essential to support economic growth, enable flexible and home working, facilitate access to services, and ensure that businesses and residents can participate fully in the digital economy. The Council recognises that adequate utilities infrastructure is essential to support new development. The Draft Local Plan has been prepared in consultation with utilities providers to assess existing capacity constraints and infrastructure requirements arising from planned growth, and this engagement informs the Infrastructure Delivery Plan, which identifies necessary infrastructure improvements including water supply reinforcement, wastewater treatment capacity upgrades, and electricity network enhancements.
Overarching theme: Local Plan Process and Planning Process		
Consultation process	Mixed feedback has been received on the consultation process, with some asking for greater transparency and wider publicity to residents. Comments suggest dissatisfaction with the number of consultation processes that residents feel required to respond to.	The Council has considered previous feedback in its current draft Plan. However, the context has changed since earlier versions of the Plan, including changes to national planning policy, housing need, and wider economic and social changes, making a new Plan necessary in line with government requirements. The Council appreciates the time and effort offered by residents in responding to consultation efforts, and wishes to take local views into account, while also having to comply with government requirements regarding plan making and engagement on each version of the Plan published.
Council decision-making	Emphasis is placed on prioritising the wishes of existing residents in decision making on planning applications. Other comments query the experience of planning officers and consideration of the Planning Committee's political affiliations.	The Council wishes to and is obliged to take into account views of existing residents as well as to plan for future needs, which include those of existing as well as future residents. The Council is also obliged by national policy and legislation to plan for identified housing and other needs which will arise during the Plan period. The Council will take residents' and other representations received into account when writing the Regulation 19 version of the Local Plan. However, HBC will still be bound by national policy and legislation, as well as by the results of technical evidence, which limits what the Council is able to propose in its Local Plan. Equally, the Council has a statutory duty to assess and approve or reject planning applications based on material considerations in line with planning policy and legislation, particularly where the Council has struggled in the past to meet its identified needs for housing and/or economic

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
		development. Objections from residents and councillors to a planning application can only lead to a refusal if they are justified through material planning considerations. Where a refusal is deemed unreasonable, applicants can appeal the decision. The Council stands by and is supportive of officers providing their specialist expertise and guidance for plan-making and decision-taking.
Decision-making process	There is both support and concern for how the Local Plan will be used to inform decision making.	The Council makes planning decisions in accordance with the statutory development plan and material considerations, as required by planning legislation. The planning system balances competing interests and must consider national policy, local evidence, and the merits of individual proposals. The Council's approach to decision-making is subject to scrutiny through the planning appeals process and judicial review, ensuring accountability and legal compliance.
Evidence	Support is given to the Infrastructure Delivery Plan. Recommendation is made to update the Plan and the Draft Infrastructure Delivery Plan with separate cost inputs for health infrastructure. A further recommendation is made to include a labour demand model in the Economic Study, where some key considerations are alleged to be missing. Some representations voice concerns that some policies are missing key evidence.	The Council welcomes support for the evidence underpinning the Plan and will carefully consider all representations raising concerns about the adequacy, robustness, methodology, or conclusions of evidence base documents. The Council will review whether any evidence requires updating, additional work, or independent review to ensure it is fit for purpose and supports the Plan's strategy and policies.
Plan-making process	The feedback on the Local Plan revealed both support and significant concerns. Support came from various stakeholders advocating for ongoing engagement in the plan-making process. Objections were raised regarding the legality, transparency, and the plan's conformity with national policy. Responses questioned the plan's soundness, its appropriateness given upcoming local government reorganisation,	The Draft Local Plan has been prepared in accordance with national policy and guidance. As part of preparing the Regulation 19 Publication version of the Local Plan the Council will undertake a review to ensure that all local policies are aligned with national policy, including the National Planning Policy Framework published following the conclusion of this Regulation 18 consultation, to minimise duplication of requirements and standards where relevant and considering the timeframes of the emerging Local Plan. The Council is required to prepare a Local Plan under planning legislation to guide development in the Borough. While decisions and changes regarding local government reorganisation is awaited, the Council must continue to plan for its area until any changes take effect. The Plan will provide an up-to-date policy framework regardless of future administrative changes.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	and whether sufficient progress had been made on key challenges before the Regulation 19 publication. Recommendations emphasised the need for policy alignment with national requirements without duplication.	The Council will take residents' and other stakeholders' representations received into account when writing the Regulation 19 version of the Local Plan. However, HBC will still be bound by national policy and legislation, as well as by the results of technical evidence, which limits what the Council is able to propose in its Local Plan.
Site selection	Some feedback notes that without sight of certain technical evidence, which is still emerging / not published at the time of consultation, stakeholders' abilities to comment on sites are limited. Viability assessment should be used to inform site selection. The needs of specific local groups should be met as part of the site selection process, and this must include assessment of impacts on persons with protected characteristics. Further feedback asks for consideration of cumulative impacts of multiple allocations.	The Council's site selection process assesses all potential development sites through the Housing and Employment Land Availability Assessment (HELAA), Sustainability Appraisal, and technical evidence. Sites are selected based on their suitability, availability, achievability, and performance against sustainability criteria. The Council will consider all representations on site selection and review the evidence to ensure the most appropriate sites are allocated in the Regulation 19 Plan. The need for different housing types and tenures has been considered through the Local Housing Needs Assessment and will be addressed through Local Plan policies. Whole Plan Viability Assessment informs final site selection, alongside other evidence, to ensure sites are available, suitable and achievable. Some evidence is still emerging at the time of Regulation 18 consultation, and further evidence will be published alongside the Regulation 19 publication. Cumulative impacts will be considered by the Plan as it progresses.
Overarching theme: Places and Growth Sites		
Delivery	Affordable housing and mitigation costs should not be compromised to improve viability. Questions are raised on the processes for monitoring future implementation and impact of the Plan. Improved availability of information would help evidence deliverability.	Planning conditions and obligations are required to mitigate the impacts of development and make development acceptable in planning terms. The Council will include a comprehensive monitoring framework with the Local Plan, setting out indicators, targets, and triggers for policy review. An Annual Monitoring Report will track implementation of policies and delivery of allocations, identifying any issues that require corrective action. This approach ensures the

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
		Plan remains effective and responsive to changing circumstances over the plan period, in accordance with national policy requirements.
General opinion	Both general support and opposition are voiced for development on sites considered as candidates for allocation. Support is given for new employment and growth opportunities, whilst objections are due to concerns regarding potential impacts on existing businesses, devaluation of existing housing stock, loss of green spaces, loss of landscape character and trees.	The Draft Local Plan outlined candidate sites proposed for potential allocation that provide the greatest overall benefits by delivering housing, including affordable homes, supporting economic growth, providing necessary infrastructure, protecting environmental assets, and creating high-quality, sustainable communities. The Council will ensure that draft site allocations in the Regulation 19 Local Plan contribute positively to sustainable development and the long-term wellbeing of Hertsmere's current and future residents, taking into account a variety of technical evidence and representations made. Where a development proposal could affect Ministry of Defence (MOD) assets, the local plan will consider the potential impacts and require appropriate mitigation measures.
Omission sites	Sites are identified as suitable and available for allocation in the Plan in the areas of Borehamwood, Bushey, Potters Bar, and Radlett.	The Council has assessed all submitted sites through the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Selection of sites as candidates for allocation is based on suitability, availability, achievability, and conformity with the spatial strategy. The Council will review all representations promoting omission sites and consider whether any should be allocated in the Regulation 19 Plan, informed by updated evidence and the need to meet the housing requirement.
Overarching theme: Transport		
Active Travel (including walking, cycling)	Responses request that development should not impact access to Public Rights of Way (PRoW), and they should be enhanced in line with the HCC Rights of Way Improvement Plan to facilitate active travel. There are some concerns that proposed allocations are unsuitable for pedestrian access and walking routes, and pedestrian and cyclist safety could be at	The Council acknowledges the value of PRoW and access to them. The Plan will have regard to the HCC Rights of Way Improvement Plan (ROWIP) and national policy and guidance on the subject when developing policy. The Council will require development to consider safe routes to schools, shops, public transport and employment in accordance with NPPF paragraph 114 on prioritising pedestrian and cycle movements and creating safe and accessible places.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	risk. Their needs should take greater priority. Representations also highlight that the plan should consider alternative methods of transport for older and disabled persons.	
Buses	Recommendation is made for improved public transport to support growth.	The Council agrees that improved public transport is essential to support sustainable growth. The Plan will require major developments to contribute to public transport improvements, including enhanced or new bus services, new or upgraded bus stops and shelters, and real-time passenger information.
General opinion	Several objections are made in response to the Plan's proposed 'car-lite' approach and related to challenges in existing transport infrastructure supporting growth. Others agree with the 'car-lite' strategy, so long as it is supported by improved active travel and public transport. Several representations supported sustainable travel networks. Requests were made for robust evidence of impacts on the strategic road network and that National Highways should be consulted. Some representations note that developments outside of Hertsmere could also add cross-boundary pressures.	The Council's approach to car-lite development is informed by evidence of site accessibility, public transport provision, and active travel connectivity. The Plan recognises that car-lite approaches are most appropriate in highly accessible urban locations with good public transport links. In rural and semi-rural areas, the Plan will apply parking standards that reflect accessibility levels and local circumstances, in accordance with NPPF, which requires development to provide appropriate opportunities for sustainable transport while recognising that opportunities will vary between urban and rural areas.
Highways	General concerns note that development could worsen traffic, with specific concerns in Hertsmere, and assert that there is a need for new highways capacity to accommodate housing growth, particularly as traffic issues already exist. These include capacity constraints at key junctions and lack of public transport. A response notes	The Plan is informed by transport modelling and a Transport Study to assess the impact of proposed growth on the transport network. The Infrastructure Delivery Plan identifies necessary transport infrastructure improvements to support development. Site allocation policies will include transport mitigation requirements, and developer contributions will be secured to deliver necessary improvements. Development will only be allocated where it can be demonstrated that transport impacts can be adequately mitigated. The Plan also wants to encourage a modal shift towards more sustainable and active modes of

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	that development close to the A4 conflicts with the NPPF.	transport where possible, to combat climate change, improve air quality, and promote healthy communities.
Parking	There is opposition to loss of parking provision, particularly at railway stations. It is unclear how parking reductions would be implemented and what alternatives would be in place for town-centre access and commuter journeys.	The Council's approach to town centre parking will balance the need to optimise land use for regeneration with maintaining adequate parking to support town centre vitality and commuter access. Any reduction in public parking will be subject to parking impact assessments and consultation with stakeholders. The Plan also wants to encourage a modal shift towards more sustainable and active modes of transport where possible, to combat climate change, improve air quality, and promote healthy communities.
Rail	Feedback observes that growth may require improved rail connections, with existing services already under pressure.	The Council acknowledges existing pressure on rail services and the need for capacity and accessibility improvements. While the Council cannot require rail operators to upgrade services or stations, it will work proactively with Network Rail and operators to identify infrastructure needs arising from planned growth. The Infrastructure Delivery Plan will set out rail infrastructure requirements, and the Council will advocate for rail investment through engagement with transport authorities and government.
Overarching theme: Vision, Objectives and Spatial Strategy		
Objectives	A mix of opposition and support is given for the Plan's objectives.	The Council has developed objectives based on evidence of local needs and challenges, community engagement, and national policy requirements. All representations will be considered in finalising the Plan's objectives for the Regulation 19 version.
Spatial Strategy	The spatial strategy and settlement hierarchy are widely commented on, with a range of support and opposition. The status of the Settlement Vision Spatial Strategy is queried. It is also noted that the economic strategy should be consistent with national planning policy. Opposition and concern are largely connected to the scale of development and possible cumulative impacts, particularly in combination with other recent development,	Further work is being undertaken on the Settlement Visions, alongside wider evidence and engagement. These visions will be completed before the Plan is adopted. They will inform the key spatial objectives and policies relevant to specific places in Hertsmere, as well as policies on spatially sensitive matters such as building heights. If it is deemed that further detail is required, beyond what is in the Local Plan, the Council will consider subsequently producing settlement specific design codes or standards which would undergo consultation and independent examination before being adopted as Supplementary Plans. However, sites allocated in the Local Plan may come forward prior to such Supplementary Plans being adopted. The Settlement Hierarchy itself is established and finalised and is not being reconsidered.

Themes and sub-themes	Summary of representations received by theme / sub-theme	HBC response to representations summary by theme / sub-theme
	as well as impacts on landscape character. Feedback queries whether the Plan could lead to coalescence of existing settlements. There is an alleged lack of evidence of a sustainable approach and Green Belt impacts are noted. Concerns also note increased pressure on existing infrastructure where existing sites are further developed at scale, although other representations favour making use of previously developed or grey belt land, considering site accessibility and active travel viability.	
Vision	A mix of opposition and support is given for the Plan's vision, with one comment advising a countryside and landscape-led approach rather than growth-led Plan.	The Council welcomes support for the Plan's vision. The Draft Local Plan vision has been developed through community engagement, consultation on issues and options, evidence gathering, and assessment of the borough's development needs, constraints, and opportunities, and seeks to balance the need to provide sufficient housing and employment development to meet identified needs with the protection and enhancement of Hertsmere's environmental assets, Green Belt, heritage, settlement character, and quality of life.

6. Summary of Responses from Consultee Groups

6.1 Stakeholder Groups

6.1.1 Stakeholders were grouped, in line with categories based on the statement of community involvement. These categories include:

- residents;
- businesses;
- developers, agents and landowners;
- central and local government departments; prescribed consultation bodies;
- local community and amenity groups;
- local service groups;
- parish and town councils;
- members of Parliament / local councillors
- national and county bodies / organisations; and
- neighbouring and other relevant plan-making authorities.

6.1.2 Figure 4 shows the breakdown of responses across the stakeholder groups by unique respondent (with template responses removed), with the most responses received from stakeholders categorised as residents. Note that in some cases there were overlaps between categories. A further 3,904 template responses were received from residents, based on templates provided by community organisations and are summarised separately below.

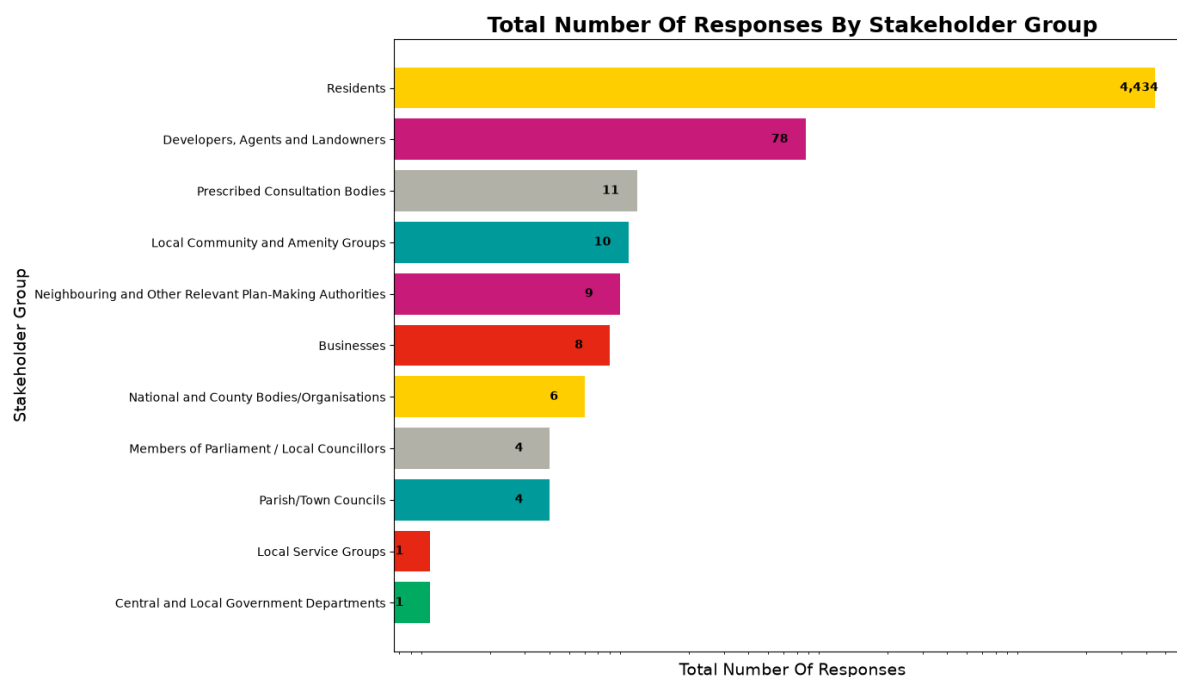


Figure 4. Total Number of Responses by Stakeholder Group

6.1.3 Following sections include summaries of representations made by respondent category. More detail is provided on specific respondent representations, where appropriate.

6.2 Residents

6.2.1 4,434 individual residents provided representations to the Local Plan at Regulation 18 stage.

6.2.2 The key themes and sub-themes on which most resident representations commented were:

- Housing – General opinion/view and housing need
- Green Belt/ grey belt
- Place & Growth Sites – General opinion/view
- Vision, Objectives and Spatial Strategy – Spatial Strategy and
- Transport – Traffic.

6.2.3 Key sentiments expressed by residents on the Local Plan centred on:

- Concern about the housing numbers proposed;
- Concern about the loss of Green Belt and about the methodology used for assessing Green Belt and grey belt land;
- Both support and concern about the candidate sites presented for allocation;
- Concern about the spatial strategy, including about how growth is proposed to be distributed, and concern that the locations selected for growth are not sustainable; and

- Concern about existing traffic in Hertsmere and the impact of future growth.

6.2.4 Many residents chose to respond by copying, and in some cases, adding to or amending one of a number of Template Responses provided by other individuals, or by local community or amenity groups.

6.2.5 In processing the consultation, the Council noted ten main templates which were most frequently utilised, resulting in 3,904 identical or very similar responses in total. These were received via email or hand-written submissions, as shown in the table below.

Table 2: Summary of template responses copied and issued by residents, originating from local community and amenity groups

Template	Summary of comments
Email templates	
Save Hertsmere – General	Comments raise concerns that proposed housing development is not sustainably planned and that the plan's evidence base is insufficient, although support is voiced for housing delivery on the main Bowmans Cross site within the plan period. The template opposes aspects of the approach to securing high-quality design and considers the proposed policy approach to new homes in the countryside and Green Belt too permissive, allegedly risking incremental, cumulative development that undermines the spatial strategy. The representation also objects to the Plan's proposed "car-lite" strategy and reduced parking provision, particularly in rural and semi-rural contexts, questioning deliverability, implementation, and what alternatives would support town-centre vitality and commuter access. The representation questions the alignment of requirements for affordable housing with the local housing needs assessment evidence and suggests that these should be higher, although objecting to the specific percentage requirements proposed for Green Belt sites. The 'Save Hertsmere' template representation also expressed a preference for on-site infrastructure provision over off-site contributions. Meanwhile, the sentiment expressed in the template response was somewhat supportive of the policies in Part 2 of the plan. Sites mentioned: Bowmans Cross Sentiment: Mostly concern, some support
Save Hertsmere – Radlett	Comments express broad objections to and concerns on aspects of the Local Plan and the sites proposed as candidates for allocation, citing risks to local character, insufficient evidence and issues around soundness, as well as questions on the sustainability and distribution of the spatial strategy. The template representation alleges that certain sites are in an unsuitable location beyond walking distance of key services and rely on a single access point is inadequate for the scale of development, exacerbating congestion. The template is concerned that proposed transport measures will not resolve existing traffic pressures in Hertsmere. The representation raises repeated concerns about existing infrastructure capacity for electricity, water, gas and wastewater, and about flood risk, including loss of functional floodplain. Further concerns were raised on potential impacts to Public Rights of Way. The template opposes building on the Green Belt, with concerns for the Green Belt assessment methodology being used and favour an approach that prioritises brownfield development before releasing Green Belt land. Further questions are raised about the robustness of the evidence base, the housing delivery trajectory, and conformity with national policy. The representation recommends exploring alternatives with stronger connections to the strategic road network, for example, near the Hillfield substation with access to the A41, in Shenley with access to the M25 and

	via Borehamwood to the A1, and land to the west of Theobald Street. Prioritisation of flatter sites would also better enable active travel options. Alongside these objections, the template notes general support for elements of the Plan's strategy. Sites mentioned: HRA SA3, HRA SA4, HRA SA5, HRA SA6 Sentiment: Mostly concern
Save Hertsmere – Radlett 2	Comments express concern that the spatial strategy should be contested on grounds of scale, in terms of the number of homes, and an absence of a clear, evidence-based sustainable rationale. The template seeks greater clarity on housing targets, requirements, and need, and suggests that the inclusion of windfall sites should allow a reduction in allocations around main settlements. Respondents are concerned about losses of Green Belt land, warning that housing numbers at Bowmans Cross appear underestimated and could result in loss of Radlett's Green Belt, expressing a preference for brownfield development to be prioritised ahead of Green Belt to reduce loss of open spaces. Other concerns raised by the template relate to alleged insufficient plans for infrastructure, flood risk and potential loss of functional floodplain, and reduced car parking. While some representations which made use of this template support growth in the area, others expressed blanket opposition to any development. Sites mentioned: HRA SA2, HRA SA3, HRA SA4, HRA SA5, HRA SA6, HRA SA7, Bowmans Cross Sentiment: Mostly concern
Response to HBC Local Plan	Comments express broad objections to the sites proposed as candidates for allocation and aspects of the Local Plan, citing risks to local character, insufficient evidence and soundness, and questioning the distribution and sustainability of the spatial strategy. The template argues that certain sites are in an unsustainable location due to lack of proximity to key services and walking access. The reliance on a single vehicular access is allegedly inadequate for the scale of development and will exacerbate congestion, and plan-wide transport measures will not resolve existing traffic pressures, including wider growth in Hertsmere. The template representation raises multiple concerns about existing infrastructure capacity for electricity, water, gas and wastewater, and about flood risk, including loss of functional floodplain. Further concerns were raised about impacts on the Public Rights of Way network. The response opposes building on the Green Belt and queries the Green Belt assessment methodology and conclusions, also expressing a preference for development on brownfield land to be prioritised ahead of Green Belt release. Further questions are raised about the robustness of the evidence base, the housing delivery trajectory, and conformity with national policy. The representation recommended exploring alternatives with stronger connections to the strategic road network, for example, near the Hillfield substation with access to the A41, in Shenley with access to the M25 and via Borehamwood to the A1, and land to the west of Theobald Street. Prioritisation of flatter sites was also recommended to better enable active travel options. Alongside concerns and objections, the template notes general support for elements of the strategy. Sites mentioned: HBA SA16, HBA SA19, HBA SA20, HBA SA24, Bowman Cross. Sentiment: Mostly concern
Response to Draft Local Plan	Whilst support is expressed for delivering growth on the main sites, comments state that proposed development is not planned sustainably and that the plan's evidence base is insufficient. The template representation queries aspects of the approach to securing high-quality design and considers the policy for new homes in the countryside and Green Belt too permissive, risking incremental, cumulative development that undermines the settlement-focused spatial strategy. The template notes that requirements for affordable housing do not align with the LHNA

	and should be higher, while objecting to the specific percentage requirements proposed for Green Belt sites. On-site infrastructure provision is favoured over off-site contributions. Objections are also raised regarding the Plan's proposed "car-lite" strategy and reduced parking provision, particularly in rural and semi-rural contexts, questioning deliverability, implementation, and what alternatives would support town-centre vitality and commuter access. Sites mentioned: HBA SA7, HBA SA17, HBA SA19, HBA SA20, HBA SA26, Bowmans Cross Sentiment: Mostly concern
Green Belt Rural Character	Comments express significant objections to the draft Local Plan, citing concerns that it lacks essential evidence to support its policies and proposed allocations. The template representation highlights concern about the capability of existing infrastructure to accommodate growth, particularly in relation to housing supply and traffic congestion in Hertsmere. There is notable opposition to the spatial strategy, which the template representation believes fails to protect the Green Belt and countryside, with recommendations for a brownfield-first approach to development. Several other concerns were raised about the impacts of proposed growth on air quality, pedestrian and cyclist safety, and the potential loss of agricultural land, as well as emphasising the need for greater highways capacity and improved public transport options. Additionally, the representation recommends that the Council adopt a countryside and landscape-led approach, rather than a growth-led one, and express dissatisfaction with the consultation process surrounding the Local Plan. Overall, the representation calls for greater consideration of cumulative impacts and the necessity of protecting local character and habitats from development pressures. Sites mentioned: HBPA SA11, HBPA SA12, HBPA SA13, HBPA SA14, HRA SA2, HRA SA3, HRA SA4, HRA SA5, HRA SA6, HRA SA7 Sentiment: Mostly concern
Dove Lane HPBA SA14	The response objects to development on sites proposed as candidates for allocation and questions how development would benefit the community. Risks were identified around roads and traffic; vehicular access is deemed to be inadequate for the scale of growth and increased housing is alleged to risk worsening congestion on narrow roads and in Hertsmere. Suitable provision for safe emergency access is highlighted as crucial. The template representation also noted that car dependency would likely be reinforced where insufficient infrastructure accompanies development. Other concerns voiced relate to flood risk, loss of floodplains, and loss of Green Belt land affecting local character, designated sites, and protected habitats in an environmentally sensitive location. An additional aspect raised for consideration is the pedestrian-only railway tunnel. Preference is given for a brownfield-first approach, commenting that the spatial strategy fails to protect the Green Belt and countryside. The response registers a general objection to any development in this area. Sites mentioned: HBPA SA13, HBPA SA14 Sentiment: Mostly concern
Handwritten paper templates	
Home Farm HRA	Comments reflect broad support for the Local Plan, Spatial Strategy, policies, and proposed allocations, with many endorsements highlighting the importance of delivering affordable housing to meet needs. There are calls to strengthen the housing trajectory by adding more small sites for flexibility, alongside concerns regarding the Council's housing land supply position and the need for higher housing targets to fully meet objectively assessed needs. Additionally, there is support for delivering more homes on Green Belt release sites to maximise the effective use of land and increase affordable housing supply, as well as for self and custom build homes to diversify options. Environmental considerations are also

	prominent in the feedback, with strong support for increasing green infrastructure to enhance habitats and improve biodiversity in Hertsmere, alongside general support for biodiversity net gain in new developments. The template representation emphasises the necessity of high-quality design that respects local character and identity, as well as inclusive design principles. Furthermore, there is a significant focus on ensuring that new and improved social infrastructure is delivered alongside new development, with the representation supporting requirements for sufficient, high-quality community facilities and infrastructure to support growth. The comments indicate general approval for development in the identified area and on the proposed sites, with assertions that the site is suitable and available for allocation to meet the borough's needs, and that it is in a more sustainable location compared to other candidate sites. Sites mentioned: HRA SA6 Sentiment: Mostly positive
Well End HBA SA16 Template 1	Comments express general objection to the Local Plan, Spatial Strategy, policies, and proposed allocations, citing that the proposed allocation site referenced is not in a sustainable location and lies beyond walking distance of services and facilities. The template representation highlight risks including significant tree loss across Hertsmere, adverse impacts on wildlife due to habitat loss, the loss of best and most versatile agricultural land with implications for food security, the potential coalescence of settlements, and the displacement of equestrian uses, alongside concern that the plan would lead to the loss of existing social infrastructure. Sites mentioned: HBA SA16 Sentiment: Mostly concern
Well End HBA SA16 Template 2	Comments express significant concern and objection to the Local Plan, Spatial Strategy, policies, and proposed allocations, arguing that the proposed allocation site referenced is not in a sustainable location and is beyond walking distance from essential services and facilities. The template representation expresses worries about the impact of housing development on wildlife due to habitat loss, the loss of best and most versatile agricultural land affecting food security, and the potential coalescence of settlements. Additionally, there are concerns the plan may lead to the loss of equestrian uses and existing social infrastructure. Specific site-related concerns include flood risk, which raises further apprehension about the proposed developments. Sites mentioned: HBA SA16 Sentiment: Mostly concern

6.3 Businesses

- 6.3.1 Eight local businesses provided representations on the Local Plan at Regulation 18 stage. This included the detailed responses summarised below.
- 6.3.2 A response was submitted by **Savills** on behalf of **Aldenham Golf and Country Club**, giving detailed feedback on housing need in the Plan area. In summary, feedback covers the following key points:
- Concern that the current housing policies will not deliver sufficient housing to meet identified needs within Hertsmere and the broader Housing Market Area, including unmet need from London.
 - Concern over insufficient clarity on housing targets, housing requirements and housing need, particularly around delivery rates.
 - Opposition towards the Council's methodology for calculating housing requirements, particularly considering the updated Standard Method

requirements increasing housing need from 731 to 1,034 dwellings per annum.

- Concern about Hertsmere accommodating more housing, with concern that tying planning consent to delivery timelines will reduce the sites bought forward for development.
- Support for delivery of affordable housing, including the approach that allows for off-site delivery or financial contributions where in-site provision is unviable. housing requirements should be tested against site-specific financial viability appraisals.
- Agreement that smaller sites can meaningfully contribute to housing supply.

6.3.3 **Oakridge Farm Ltd** submitted a response focused on site **HRA SA3, HRA SA4 and HRA SA6**. It raises general concerns about the Plan and its evidence base, and gives detail on impacts to agriculture, landscape character, biodiversity, and Green Belt. In summary, feedback covers the following key points:

- Overall objection to development on site HRA SA3 following previous objections in 2018 and 2021 consultations with concerns about coalescence of settlements, particularly at High Cross hamlet. The respondent is concerned that development is disproportionate and unsustainable and would undermine the local character and identity of Radlett, the function of High Cross and asserts that this site is too remote from Radlett centre for walking access for services and facilities.
- Concerns over loss of best and most versatile agricultural land at these sites, with the SA3 site comprised of 58% grade 2 land and 32% grade 3a land. These concerns are expanded to cover food security and efficient carbon sequestration, supporting climate emergency commitments.
- Concern about evidence supporting the plan, particularly regarding the agricultural framework and regard for previous landscape sensitivity assessments.
- Concern about the impact on listed buildings and their settings, including grade II listed farmhouse at Kemprow Farm, noting previous studies (LUC 2020) identified moderate to high landscape sensitivity to residential development.
- Concern for wildlife and habitat impacts from development around Radlett, with parts of SA3 identified as 'Areas with Potential to become of Particular Importance for Biodiversity' under Hertfordshire's LNRS.
- General opposition to building housing on Green Belt, noting this site should be protected.
- Objection to the classification of Radlett as a Category III Small Town, recommending it remains as Category IV, in line with the Neighbourhood Plan.
- Concern that the plot SA7 is categorised as 'Safeguarded Land for Housing' under Policy SADM2 but has failed to come forward and asserting that its deliverability is questionable. Its beneficial location to Radlett is asserted to support the development of HRA SA3.

- Objection to the proposed spatial strategy, which is considered inconsistent with its stated aim of directing growth to sustainable locations and protecting existing settlements, suggesting that more growth should be directed to Bushey and Bowmans Cross.

6.3.4 **The Hertsmere** (a local golf course) submitted a consultation response, giving its perspective on contributing towards housing need whilst maintaining recreational facilities. In summary, feedback covers the following key points:

- In support of The Hertsmere for retaining a golf course on site with sport and recreation facilities supporting the local population, whilst also making a sizable contribution towards the Borough's housing needs.
- Agreement that there is an opportunity for existing golf courses to contribute towards multiple uses within the Council's spatial strategy which can include the delivery of housing, provision of open space, recreation opportunities and biodiversity net gains.

6.3.5 **Graham and Sibbald Chartered Surveyors and Property Consultants** submitted a consultation response giving views on the Green Belt assessment, site HRA SA3 and SA4, the Spatial Strategy, housing policies and cumulative impacts. Their response can be summarised into the following key points:

- Concerns that the assessment underestimates the contribution of land around Radlett to Green Belt purposes and does not adequately consider cumulative impacts.
- Objection to development of sites HRA SA3 and HRA SA4, due to risks of settlement coalescence, loss of Green Belt openness, and harm to countryside character.
- Support for directing growth to the most sustainable settlements but opposes exceptions that would allow development in less sustainable locations.
- Questioning housing exceptions in very small rural settlements as inconsistent with the Plan's sustainability objectives.
- Seeking removal of the site HRA SA4 due to the impacts on agricultural land, landscape buffering, heritage assets, accessibility, and local infrastructure.
- Concern over the cumulative impact of development of HRA SA3, HRA SA4 and HRA SA6 as it is considered likely to expand Radlett, alter local character, increase settlement merging, and undermine Green Belt purposes.

6.3.6 A response on behalf of **Killik & Co Trustees** welcoming a focus on deliverability and strengthening the housing trajectory, although concerns are raised around the approach within housing policies in the Plan. Their submission can be summarised into the following points:

- Concern that the proposed spatial strategy is not suitable for sustainable place-making and growth.

- Support for strengthening the housing trajectory with additional supply to ensure flexibility and appropriate development for the area.
- Concern that Policy H10 needs to provide stronger support for specific site allocations of an appropriate scale and density within the smaller rural settlements and villages, rather than relying on windfall developments.
- Recommendation that sites which feature naturally defensible boundaries should be prioritised, such as existing hedgerow landscape features. This would help to best protect smaller rural settlements and villages from inappropriate levels of growth, and early engagement through the Plan process can ensure the right type of growth for local needs.
- Support for the allocation of the site at Church Lane, Aldenham in contributing to housing delivery.

6.3.7 **Clowes Development UK** submitted a brief response focused on a plot to the **east of Barnet-By-Pass (A1)**, summarising the constraints and opportunities of the site. In summary this representation:

- Agrees that there are sufficient local infrastructure and services to support the provision of an employment scheme in this location.
- References some environmental constraints, including allocation of a Local Wildlife Site on part of the site, existing woodland, Flood Zone 2 along the western boundary, and some areas of surface water flooding.
- Mentioned a previously permitted scheme on the site which was refused due to the access proposed from Rowley Lane.

6.4 Local Community Groups and Interest Groups

6.4.1 Representations in this category include feedback from organisations including those summarised below.

6.4.2 Please note that where templates for responses to the Local Plan consultation were provided by local community or interest groups and copied by residents, these have been reflected in our report in the previous section 6.2 above, rather than here.

6.4.3 **Herts & Middlesex Wildlife Trust (HMWT)** submitted a detailed response to the Hertsmere Local Plan Regulation 18 consultation, focusing on the Plan's approach to biodiversity, Local Wildlife Sites, green and blue infrastructure, and nature recovery. In summary, their submission gave the following feedback, which:

- Urged inclusion of all designated sites and Local Wildlife Sites (LWS) on the policies map, with clear boundaries and links to the Local Nature Recovery Strategy (LNRS).
- Noted some allocations overlap or border LWS; recommended integrating LWS into site design, applying buffers, and using Ecological Impact Assessments (EclA) for all relevant sites.
- Called for stronger protection and creation of priority habitats in Policies GI1 and GI2, with specific reference to chalk streams and ecological networks.

- Recommended Policy GI4 sets more ambitious Biodiversity Net Gain (20%), includes species recovery, and requires swift/bat bricks in new buildings.
- Suggested Policy GI5 support features for priority urban species (e.g., swifts, bats, hedgehogs).
- Supported air and groundwater policies; requested more on soil, noise, and light pollution. Emphasised use of up-to-date ecological data and LNRS.

6.4.4 **British Horse Society** (BHS) Hertfordshire Access Team submitted a detailed response to the Hertsmere Local Plan Regulation 18 consultation, focusing on the Plan's approach to countryside access, equestrian infrastructure, and the rural economy. In summary, their submission gave the following feedback:

- Welcomed the opportunity to comment but expressed concern that the draft Plan fails to adequately recognise the strategic importance of Public Rights of Way, bridleways, and equestrian users within Hertsmere's predominantly rural and Green Belt landscape. Noted that the Plan adopts an urban-centric approach, with insufficient consideration for rural communities, countryside access, equestrian safety, and the rural economy.
- Highlighted an opinion of clear regression from the previous Local Plan, which had explicitly supported non-motorised multi-user access networks (including horse riders) and Greenways. The new Plan removes almost all references to equestrians, bridleways, and countryside connectivity, despite increased development pressures and national policy support for active travel and healthy lifestyles.
- Stressed the economic significance of the equestrian sector in Hertfordshire, with around 21,694 horses contributing an estimated £143 million annually to the local economy. Emphasised the need for explicit policy support for Greenways, bridleway enhancement, equestrian access and safety, and integration of horse riders within sustainable transport and Green Infrastructure planning.
- Found the Plan does not suitably recognise the rural economy, with little meaningful support for agriculture, recreation, rural SMEs and related industries.
- Criticised the Plan for not recognising Rights of Way and bridleways as strategic infrastructure assets, and for treating Green Infrastructure mainly as mitigation for development rather than as a spatial constraint shaping growth. Argued that the Plan risks severing rural communities and undermining health, sustainability, and rural economic resilience.
- Recommended that the Plan should:
 - Include a dedicated rural economy policy to support related industries and jobs for a prosperous rural economy
 - Reinstate explicit policy support for Greenways, bridleways, and multi-user access routes
 - Recognise equestrians as vulnerable road users

- Strengthen policies protecting Green Belt openness and countryside character
- Support the rural economy and equestrian sector
- Require safe multi-user connectivity within new developments
- Ensure Green Infrastructure functions as a genuine spatial constraint.
- Asserted omissions in policies relating to inclusive access, healthy communities, and sustainable transport, and called for greater recognition of the health and wellbeing benefits of equestrianism, especially for women, older adults, and disabled participants.
- Contended that the Plan currently fails to integrate countryside access, equestrian activity, rural recreation, and the rural economy into its spatial strategy, green infrastructure, and transport framework, and requested amendments to address these issues.

6.4.5 **Bushey and District Footpaths Association (BADFA)** submitted a response to the Regulation 18 consultation, focusing on the draft Local Plan’s approach to open space, Green Belt, and Rights of Way. In summary, their submission gave the following feedback:

- Supported regeneration and development of previously used sites in Bushey town centre but opposed expansion into valued open green spaces and excessive reclassification of Green Belt as “grey belt” for development. Stated the draft Plan’s housing proposals for Bushey go too far.
- Emphasised the importance of high-quality open space, referencing the NPPF, and strongly urged that areas set aside as open space in planning applications be voluntarily registered as Town or Village Greens for long-term protection.
- Stressed that existing Rights of Way and footpaths should be maintained and improved, with diversions only in exceptional cases. Urged the Council to ensure commitments to enhancing walking and cycling routes are delivered in practice.
- Provided site-specific comments:
 - HBUSA SA4: Opposed development at Harts Farm (recently refused as Green Belt); highlighted ongoing issues with blocked Rights of Way (Bushey 33 and 40).
 - HBUSA SA5: Noted two Rights of Way (Bushey 12 and 21) cross the site.
 - HBUSA SA6: Noted Right of Way (Bushey 50, part of the London Outer Orbital Path) crosses the site.
 - HBUSA SA7: Supported some development on brownfield land but urged legal protection for planned open space (preferably as Village Green) and creation of a new Right of Way from Bushey High Street to Merry Hill Road.

- HBUSA SA8: Supported creation of a new Right of Way south of Hillfield Brook to supplement Bushey 03, which is narrow and difficult in places.

6.4.6 Elstree and Borehamwood Green Belt Society (EBGBS) submitted a comprehensive response to the Regulation 18 consultation, focusing on the draft Local Plan's approach to Green Belt protection, spatial strategy, site allocations, and infrastructure. Their submission can be summarised as EBGBS:

- Welcomed the need for an up-to-date, plan-led Local Plan, but strongly objected to the standard method housing target and the disproportionate allocation of new homes to Borehamwood. Advocated for a capacity-led approach, prioritising urban brownfield and previously developed land, and reducing reliance on Green Belt release.
- Opposed the principle and practice of “provisional grey belt” classification, arguing that land is either Green Belt or not, and that sites with flood risk, heritage constraints, or strategic value should be excluded from development.
- Ranked candidate sites from most acceptable (brownfield and consented sites) to most strongly opposed (undeveloped Green Belt and strategic gap sites). Supported urban brownfield sites (HBA SA1–SA15, SA21, SA23) and reluctantly supported consented Green Belt sites (HBA SA17, SA18, SA25, SA26) but strongly opposed development of Hertsmere Golf Course (HBA SA20), Well End (HBA SA16b, SA16c), and land north/south of Allum Lane (HBA SA24, SA19) due to risks of settlement coalescence, loss of wildlife corridors, flood risk, and traffic impacts.
- Objected to candidate sites within the strategic gap between Radlett, Elstree, and Borehamwood (OGB-042, OGB-043), stating these sites perform a high strategic role in preventing coalescence and must remain protected.
- Called for a mandatory “Strategic Gap Policy” to forbid release of land contributing to physical or visual separation of settlements, and for a sequential hierarchy prioritising urban brownfield and built-on land before any Green Belt release.
- Stressed that no Green Belt allocations are sound or deliverable until critical infrastructure bottlenecks are resolved, including expansion of Maple Lodge Sewage Treatment Works, a “No School, No Homes” phasing policy to address secondary school deficits, and funded mitigation for strategic transport bottlenecks.
- Recommended detailed policy amendments, including higher density requirements for any forced Green Belt release, minimum affordable housing quotas, strict biodiversity net gain delivered on-site, and protection of informal community assets such as Well End fields and Hertsmere Golf Course.
- Objected to premature release of Green Belt for employment use and called for full build-out of existing brownfield and safeguarded employment land before any new allocations.
- Proposed alternative spatial strategies, including accelerated delivery at Bowmans Cross to offset development pressure on fragile Green Belt

gaps, and called for robust cross-boundary cooperation and infrastructure guarantees.

- Requested that future iterations of the Plan include plain English summaries, interactive mapping, and transparent monitoring processes to ensure accessibility and accountability.

6.4.7 Letchmore Heath Village Trust (LHVT) submitted a detailed response to the Regulation 18 consultation, focusing on the draft Local Plan's approach to growth in Radlett, Green Belt protection, spatial strategy, candidate site selection, and infrastructure. Their submission can be summarised as follows:

- Noted that Radlett is proposed to accommodate an approximate 94% increase in housing, fundamentally altering its scale and character. This is significantly higher than the percentage increases proposed for other main settlements in Hertsmere, requiring careful scrutiny and meaningful public engagement.
- Criticised the consultation process for offering limited strategic choice and failing to present reasonable alternative spatial strategies for Radlett. LHVT advocated for a more iterative, "long form" consultation process that would allow communities to explore realistic alternatives and site combinations before preferred allocations are selected.
- Proposed an alternative dispersed growth strategy based on a wider range of smaller and medium-sized sites promoted through the Call for Sites process. LHVT argued this approach would better align with the Local Plan's stated objectives of sustainable, walkable communities, incremental growth, and protection of settlement character.
- Raised significant concerns about the Green Belt implications of the preferred strategy, especially the use of "provisionally grey belt" as a classification for candidate sites, arguing that this term lacks statutory definition and transparency, and risks facilitating large-scale Green Belt release without robust justification.
- Supported development of four brownfield and previously consented sites (HRA SA1, SA2, SA5, SA7) in principle but opposed allocation of three principal strategic Green Belt sites (HRA SA3, SA4, SA6), citing sustainability, deliverability, infrastructure limitations, and cumulative traffic impacts.
- Called for a more balanced approach to housing requirements, prioritising brownfield redevelopment, regeneration, underused urban land, and incremental growth before extensive release of undeveloped countryside.
- Criticised the Infrastructure Development Plan for lacking certainty regarding delivery, funding, timing, and capacity. LHVT argued that concentrated development risks severe additional pressure on Radlett's constrained road network, schools, station parking, healthcare, water supply, and wastewater infrastructure.
- Recommended clearer infrastructure phasing, funding mechanisms, cumulative impact assessment, delivery triggers, monitoring arrangements, and safeguards linking later phases of development to demonstrated infrastructure delivery.

- Supported regeneration of Radlett town centre and redevelopment of suitable brownfield land but opposed the overall scale and concentration of strategic Green Belt release as unjustified and unsustainable.
- Suggested that a more ambitious approach at Bowmans Cross could accommodate a greater proportion of long-term housing growth in a planned and sustainable manner, reducing pressure for extensive Green Belt release elsewhere.
- Requested that the Local Plan include a clearer framework for managing cumulative housing growth within Radlett, including monitoring and review mechanisms linked to infrastructure capacity, transport impacts, and speculative or windfall permissions.

6.4.8 North Mimms District Green Belt Society (NMDGBS) submitted a focused response addressing the draft Local Plan's approach to Green Belt protection, proposed developments on the northern edge of Potters Bar, the new settlement at Bowmans Green, and cross-boundary impacts, which can be summarised as follows:

- Strong objection to the proposed developments at HPBA SA11 (Land at Mutton Lane North) and HPBA SA13 (Former Potters Bar Golf Course), citing concerns that these would encroach into the Green Belt, significantly narrow the gap between Potters Bar and Brookmans Park/Welham Green, and impose substantial traffic and infrastructure pressures on a rural area. The Society considers these proposals inconsistent with the consultation document's vision for Potters Bar's semi-rural character and notes a lack of consultation with Welwyn Hatfield Borough Council.
- Emphasis on the cumulative impact of developing both HPBA SA11 and SA13, which together would create a large arc of new development around Potters Bar's northern and north-western edge, fundamentally altering the character of the area and affecting communities in the neighbouring borough.
- Rejection of the Green Belt assessment that designates these sites as "grey belt," maintaining that the land is currently open farmland and integral to the area's countryside setting.
- Opposition to the proposed new settlement at Bowmans Green, particularly due to its location on the western border of North Mymms parish. The Society highlights the potential for significant additional traffic and infrastructure pressures on North Mymms and surrounding villages and calls for any such development to be subject to full cooperation between neighbouring local authorities.
- Strong criticism of the Green Belt Assessment's conclusions, which the Society believes would, if implemented, remove Green Belt protection from the majority of Green Belt land within the borough.

6.4.9 Potters Bar (Special Interest Group) Residents Association (PBSIGRA) submitted a detailed response focused on the draft Local Plan's approach to Green Belt protection, the scale and distribution of development around Potters Bar, infrastructure, and the consultation process. In summary, their submission gave the following feedback:

- Recognition of the need for an up-to-date Local Plan and the provision of new housing, but objection to the current strategy, which is seen as placing excessive emphasis on housing numbers and employment growth at the expense of environmental protection and community wellbeing.
 - Strong concern that the consultation process was difficult for many residents to engage with, due to the complexity and volume of documentation, and the structure of consultation questions, which made it challenging to provide alternative viewpoints or strategic objections.
 - Criticism of the Local Plan's lack of recognition of Hertsmere's fundamentally rural character, with insufficient weight given to the countryside's role in biodiversity, recreation, landscape character, food production, climate resilience, public health, tourism, and the identity of local communities.
 - Emphasis on the importance of Green Belt land in preventing urban sprawl, safeguarding countryside, preserving openness, and maintaining settlement identity. PBSIGRA does not believe the evidence sufficiently demonstrates the exceptional circumstances required for the scale of Green Belt release proposed and expresses concern about the use of "grey belt" as a concept.
 - Advocacy for prioritising brownfield development, regeneration of vacant commercial sites, and urban intensification before considering substantial Green Belt release.
 - Objection to the proposed allocations around Potters Bar (HPBA SA11, SA12, SA13, and SA14), which would introduce over 2,600 dwellings onto land that currently forms an important part of Potters Bar's countryside setting. PBSIGRA highlights the contradiction between the plan's stated recognition of the importance of countryside and the scale of proposed development.
 - Concern about the cumulative impact of these allocations on Green Belt openness, settlement identity, countryside access, landscape character, biodiversity, infrastructure capacity, and residents' quality of life.
 - Insufficient evidence is provided to demonstrate how infrastructure, healthcare, schools, water supply, wastewater systems, and road capacity will keep pace with the scale of proposed growth.
 - Call for stronger policies to protect and enhance countryside access, public rights of way, and the Greenways network, as well as greater emphasis on health and wellbeing, the rural economy, food security, and climate resilience.
- 6.4.10 **The Heath-Ways Residents' Association** provided a short response focused on Green Belt reclassification. Regarding PB002, members of the Association strongly oppose the downgrading of the site from Green Belt to grey belt designation.
- 6.4.11 **The Radlett Society and Green Belt Association (RSGBA)** submitted a detailed response focused on the draft Local Plan's approach to Green Belt protection, the scale and distribution of development around Radlett, infrastructure, and the consultation process. In summary, their submission gave the following feedback:

- Acceptance that Hertsmere must deliver plans for new homes and that Radlett should make a fair contribution, but strong objection to the proposed 2,900 new homes around Radlett—representing a 94% increase in the settlement—due to lack of supporting infrastructure and the absence of sustainable development proposals.
- Support for the plan’s stated spatial objectives for Radlett, including the principle of incremental residential growth, but criticism that most candidate sites represent large-scale urban extensions rather than incremental development, and lack associated economic growth or infrastructure proposals.
- Concern that the plan does not address existing traffic problems in and around Radlett, and that the majority of proposed sites are not within walking distance of the station, shops, or medical facilities, making them unsustainable and likely to increase car dependency.
- Objection to the use of the “standard method” for calculating housing need, arguing that it does not reflect Hertsmere’s unique Green Belt constraints, and calling for a locally tailored approach that prioritises brownfield and vacant sites.
- Criticism of the Green Belt assessment and the introduction of “grey belt,” which RSGBA believes is not supported by national policy and would result in excessive loss of Green Belt land. The Society calls for a rigorous, evidence-based approach to any boundary changes.
- Concern that the plan underestimates the contribution of the proposed Bowmans Cross settlement and overburdens Radlett’s Green Belt to meet housing targets, recommending that Bowmans Cross be counted more fully towards the borough’s housing supply.
- Detailed site-by-site comments, supporting limited development on previously developed land (e.g., former petrol station), but objecting to large-scale development on Green Belt and high-quality agricultural land (e.g., Home Farm/Brickfields, North of Watford Road/Kemprow), and advocating for the use of smaller, more sustainable sites.
- Call for ambitious policies on tree and hedgerow planting, support for Aldenham Country Park, and concern over the lack of policies for the positive future of the Green Belt.
- Criticism of the consultation process for being too short and lacking meaningful engagement with local communities, and concern that the plan’s candidate site approach increases uncertainty for residents.
- Endorsement of a “brownfield first” approach, greater focus on regeneration, and a borough-wide assessment of agricultural land loss, as well as stronger policies for countryside and public rights of way protection.

6.4.12 **Save Our Shenley** Community Group submitted a detailed response focused on the draft Local Plan’s approach to Shenley’s sustainability, recent planning decisions, infrastructure, Green Belt policy, and the consultation process. In summary, their submission gave the following feedback:

- Recognition that the Local Plan document states Shenley is not sustainable for development and purports to recommend no development in or around Shenley, but strong objection that recent approvals for over 380 homes in Shenley Village and nearly 600 across the Parish contradict this published spatial strategy. The Group requests that permissions inconsistent with the Local Plan's strategy be withdrawn to ensure policy coherence.
- Concern that planning decisions taken in 2025 and early 2026 were in direct contravention of the Council's own policy documents and the agreed Local Plan, with specific reference to sites identified in Appendix M as not sustainable or suitable for development. The Group calls for these issues to be addressed before the Regulation 19 stage.
- Criticism that the draft plan underestimates or fails to assess the cumulative impacts of development on Shenley, including roads, junctions, public transport, schools, GP surgeries, and utilities. The Group highlights that major allocations such as the Borehamwood Extension and Bowmans Cross extend into Shenley Parish but are not properly represented as such in the plan.
- Objection to the Well End extension, citing unsustainable impacts on traffic, pollution, road safety, and the rural setting, as well as inappropriate encroachment on listed buildings and the potential for further industrial expansion.
- Concern over the absence of suitable public transport proposals, noting that Shenley is left surrounded by car-dependent developments with inadequate bus services, and that planned development will more than double the size of the village without sustainable transport solutions.
- Criticism of the Green Belt and "grey belt" assessment, arguing that land in Shenley identified as "provisionally grey belt" should not be treated as suitable for development without further detailed assessment, and that the plan fails to properly consider rural character, exceptional circumstances, brownfield alternatives, and smaller, sustainable sites.
- Request that the Regulation 19 Local Plan properly recognises the Shenley Neighbourhood Plan and its Design Code, and that future updates are reflected in a dedicated policy, as many aspects of the draft plan conflict with the Neighbourhood Plan

6.4.13 **Boyer** submitted a detailed response on behalf of **the United Synagogue** across a range of topics. It gives support for the need to sustainably meet housing needs with a robust strategy but raises concerns about the spatial strategy and the deliverability of housing in the Plan period. In summary, their submission gave the following feedback:

- Whilst supporting the overall vision for sustainable growth that addresses housing need, the spatial strategy may not be the most effective approach, naming as an example the reliance on strategic allocations to the east of Borehamwood.
- Support for development of grey belt land to the north of Borehamwood. The site HEL359 is found to be suitable to qualify as grey belt, with no overriding ecological, flood risk or heritage constraints but is classified as 'Provisionally grey belt'.

- Support for housing growth in Bushey, and Shenley should also accommodate proportionate growth.
- Disagreement with the deliverability of Bowmans Cross within the plan period, when considering the environmental constraints, proximity to the M25, and infrastructure requirements.
- Concern that under Policy H1 the Plan does not set out how identified housing need will be met over the Plan period.
- Suggest bringing forward additional sites of scale, including small and medium sized sites, deliverable in early years of the Plan due to over-reliance on windfall delivery and very large strategic sites to meet housing needs within the period. Reliance on past delivery trends is questioned due to the 2021 Local Plan being outdated. Sites over 1,000 homes are unlikely to contribute to the 5-year supply.
- Concern that urban sites have existing viable uses and may not come forward in the plan period.
- Support that exceptional circumstances do justify amendments to Green Belt boundaries, with it not being possible to meet housing need with urban sites alone.
- Recommendations are made that:
 - The plan period should instead cover 18 years to meet required housing figures, able to deliver 18,430 homes including a 20% buffer to address poor Housing Delivery test scores.
 - The borough's baseline housing target should be comprised of the national standard method figure and a suitable buffer.

6.4.14 **Moonstone Rescue** submitted a response focused on the impact of development on wildlife and natural habitat in the Borehamwood area. In summary, their submission gave the following feedback:

- Significant concerns are raised on the potential impact of proposed housing development on local wildlife populations, particularly the loss of habitat resulting from construction activity and land use changes. There is risk of severe and long-lasting impacts and harm to protected species, and mitigations cannot always adequately replace established ecosystems. Disturbance can also lead to increases in pest species.
- There are secondary impacts to local landscape character for communities in Well End and Borehamwood.
- Support for the implementation of biodiversity net gain principles within new developments to ensure measurable environmental enhancement.
- Recommendations are made for:
 - Inclusion of swift bricks and bee bricks in new build developments.
 - Incorporation of requirements for wildlife access points in boundary designs.

6.5 Underrepresented Groups

- 6.5.1 There are some groups and individuals who are less likely to participate in Local Plan consultations, because they may experience barriers to engaging with the Plan in the most common ways that are promoted by the Council.
- 6.5.2 Based on HBC's previous experience, in Hertsmere this can include some older and younger people, those with a disability, some members of rural and travelling communities, as well as persons from religious and ethnic minorities.
- 6.5.3 Efforts made by the Council to address common barriers to engagement on this Local Plan consultation at Regulation 18 stage have included making the consultation material available in a variety of ways, as well as offering a mix of ways for people to respond with feedback, online via a bespoke consultation platform hosted by provider Commonplace, via email, by post, or at one of a number of in-person events that were on offer. Specific documents were made available in an accessible printed format on request.
- 6.5.4 The Council also took reasonable steps to support accessibility throughout the consultation process. Consultation material was made available in alternative formats where requested, including large-print versions and copies printed on coloured paper to assist participants with visual impairments. Whilst engagement activity was not targeted towards particular groups, the consultation was undertaken in line with statutory requirements and the Council's Statement of Community Involvement, ensuring that all members of the community had the opportunity to access information and provide feedback.

6.6 Prescribed Consultation Bodies

We received representations from the following statutory consultees:

Table 3: List of Prescribed Consultation Bodies to have provided feedback

Consultee name	Consultee type
Hertfordshire County Council (HCC) - Growth team	Prescribed Consultation Body, County Council
HCC – As landowner	Prescribed Consultation Body, County Council
Aldenham Parish Council	Prescribed Consultation Body, Parish/Town Council
Shenley Parish Council	Prescribed Consultation Body, Parish/Town Council
South Mimms and Ridge Parish Council	Prescribed Consultation Body, Parish/Town Council
Elstree and Borehamwood Council	Prescribed Consultation Body, Parish/Town Council
London Colney Parish Council	Prescribed Consultation Body, Parish/Town Council

Enfield Council	Prescribed Consultation Body, Neighbouring Authority
Welwyn Hatfield Council	Prescribed Consultation Body, Neighbouring Authority
London Borough of Barnet Council	Prescribed Consultation Body, Neighbouring Authority
London Borough of Harrow Council	Prescribed Consultation Body, Neighbouring Authority
St Albans District Council	Prescribed Consultation Body, Neighbouring Authority
Watford Borough Council	Prescribed Consultation Body, Neighbouring Authority
Natural England	Prescribed Consultation Body
National Grid	Prescribed Consultation Body
Environment Agency	Prescribed Consultation Body
Historic England	Prescribed Consultation Body
Network Rail	Prescribed Consultation Body
Sports England	Prescribed Consultation Body
National Highways	Prescribed Consultation Body
Thames Water	Prescribed Consultation Body
Affinity Water	Prescribed Consultation Body
Department for Education	Prescribed Consultation Body, Central and Local Government Departments
Ministry of Defence - Defence Infrastructure Organisation	Prescribed Consultation Body, Central and Local Government Departments
NHS CEICB	Prescribed Consultation Body, Central and Local Government Departments
NHS Property Services	Prescribed Consultation Body, Central and Local Government Departments

6.7 Parish and Town Councils

6.7.1 Representations were received from the following:

- Aldenham Parish Council
- Shenley Parish Council
- Elstree and Borehamwood Council
- London Colney Parish Council

6.7.2 **Aldenham Parish Council** submitted three documents in their representation, which included a main response document, a transport

technical note appendix, and an appendix “Sandersons Accessibility by Sustainable Travel Modes report for the proposed sites”.

- In summary, Aldenham Parish Council (APC) supports the need for a new Local Plan but objects to the scale and distribution of proposed development in Radlett, the loss of Green Belt, and the lack of supporting infrastructure. APC recommends a revised, infrastructure-led approach prioritising sustainable, accessible, and policy-compliant growth.
- Scale of Development in Radlett: APC objects strongly to the proposed allocation of 2,900 new homes in Radlett, which would increase the number of households by over 90%. This is considered unsustainable and disproportionate compared to other Hertsmere settlements. Radlett lacks the infrastructure, services, and road capacity to support such a dramatic increase.
- Green Belt Loss: APC is alarmed at the scale of Green Belt land proposed for removal, particularly following the Green Belt Assessment, which designates approximately 75% of Hertsmere as ‘grey belt’ or ‘potential grey belt’. APC argues this undermines the fundamental purposes of the Green Belt and is contrary to national policy.
- Traffic and Transport: Technical assessments commissioned by APC show that key junctions in and around Radlett are already operating at or over capacity. The cumulative impact of the proposed developments would lead to severe congestion, increased delays, and queuing, with no clear mitigation strategy.
- Accessibility and Sustainability: Most candidate sites (except HRA SA1 and SA2) are not within the recommended 800m walking distance of Radlett Station. Many sites lack adequate pedestrian, cycling, and public transport links, making them car-dependent and contrary to sustainable travel objectives.
- Housing Numbers and Distribution: APC objects to both the overall housing target for Hertsmere (21,400 homes) and the distribution, which places an excessive burden on Radlett relative to its size and infrastructure.
- Green Belt Assessment Methodology: APC disputes the methodology and conclusions of the Green Belt Assessment, particularly the classification of land around Radlett as ‘grey belt’, and argues for a more robust, policy-compliant approach.
- Prioritise Brownfield and Urban Sites: APC urges the Council to focus on urban regeneration, brownfield, and infill sites, and to protect the Green Belt wherever possible.
- Review Housing Targets: APC recommends that Hertsmere challenge the government’s ‘standard method’ for calculating housing need, and the 20% buffer, given the high proportion of Green Belt and low delivery rates.
- Infrastructure First: Any development must be contingent on the prior delivery of supporting infrastructure, especially highways, schools, health, and public transport.
- Traffic Mitigation: Major junction improvements and robust traffic mitigation are required before further development is considered.

6.7.3 The table below summarises APC's feedback on Candidate Sites:

Table 4: Summary of APC' feedback on candidate sites

Site	APC Position	Key Issues Identified
HRA SA1	Support	Central, accessible, sustainable
HRA SA2	Support (with parking)	Central, accessible, but parking must be sufficient
HRA SA3	Object	Green Belt, high traffic, poor accessibility, coalescence risk
HRA SA4	Object	Green Belt, agricultural loss, poor accessibility, high traffic
HRA SA5	Support	Planning permission granted
HRA SA6	Object	Remote, unsustainable, traffic, Green Belt, no bus service
HRA SA7	Partial Support	Support for Starveacres only; object to land west of Starveacres

6.7.4 **Shenley Parish Council** submitted a single document representation and provided the following summary of their views:

- The draft Regulation 18 Local Plan has been published prematurely and cannot be supported in its current form.
- Housing capacity on paper does not remove delivery risk. That risk has not been adequately assessed.
- Basic evidence is absent, incomplete or inadequate, including infrastructure assessment and need, cumulative impact assessment, viability testing, delivery evidence and draft policy wording.
- Viability must not become a broad mechanism for weakening policy requirements, design quality or good placemaking.
- Weak housing delivery across the borough increases pressure for grey belt release and speculative development everywhere, including during the years before planned Local Plan growth is actually delivered. This interim period is not properly addressed in the assessment work. Shenley Parish already has 422 consented homes, which will place further pressure on local infrastructure.
- Land in Shenley identified as “provisionally grey belt” must not be treated as suitable for development. Further detailed assessment is required, particularly in relation to NPPF footnote 7 constraints.
- The Regulation 19 Local Plan must properly recognise the Shenley Neighbourhood Plan, Design Code and future updates through a dedicated policy.
- Shenley cannot and will not rely on the future Local Plan alone. The Shenley Neighbourhood Plan, evidence base and Design Code need urgent updating.
- Shenley's settlement status is reflected ambiguously across different parts of the evidence base. This needs to be rectified.
- Density assumptions for settlement extensions overall should not be set at such low levels (23dph) across the whole borough without being properly contextualised. They should support better connected, more sustainable and more sociable places and communities.

- The Parish Council would welcome a meeting with the Interim Head of Planning and the Portfolio Holder to discuss our situation and next steps before the end of June. This in light of the pace at which this process is moving.

6.7.5 **Elstree and Borehamwood Town Council**, like Shenley submitted a single document response, summarising that the Town Council:

- recognises the need for an up-to-date Hertsmere Local Plan;
- supports a plan-led approach rather than speculative or appeal-led development;
- accepts that additional housing must be planned for within the national planning framework;
- strongly supports a brownfield-first approach and asks that brownfield land, regeneration opportunities and urban intensification are fully explored before Green Belt release is confirmed;
- raises serious concerns regarding the scale and distribution of proposed Green Belt and grey belt release affecting Elstree and Borehamwood;
- asks that any proposed Green Belt or grey belt release is justified by clear, robust and transparent evidence;
- asks that the identity and separation of existing settlements, including Well End and Elstree Village, are protected wherever possible;
- asks that the cumulative impact of growth on Elstree and Borehamwood is assessed carefully;
- asks that infrastructure is planned, funded and delivered alongside development, not after development has already taken place;
- asks that health, air quality, GP provision, dental provision, school capacity, traffic and public transport are given greater weight;
- asks that wildlife, ecology, trees, hedgerows, drainage and biodiversity are considered cumulatively as well as site-by-site;
- asks that the mental health and wellbeing value of accessible Green Belt and open space is properly recognised;
- asks that the emerging Elstree and Borehamwood Neighbourhood Plan and supporting evidence are taken into account wherever possible;
- asks that affordable housing requirements are reviewed carefully in light of identified local need and viability evidence;
- asks that town centre redevelopment protects local businesses, shops, parking, employment and community services;
- asks that delivery mechanisms remain robust in the context of Local Government Reorganisation; and
- requests continued engagement with Elstree and Borehamwood Town Council as the Local Plan progresses.
- The Town Council reserves the right to make further comments at later stages of the Local Plan process, including at Regulation 19 and in

relation to specific site allocations, infrastructure evidence, policy wording and delivery mechanisms.

6.7.6 **London Colney Parish Council** also provided a brief representation, in which their most critical issue is highlighted as the proposed Bowmans Cross development (HBCA SA1), on which their views are stated as follows:

- The Local Plan will not be reliant upon the delivery of the new settlement to meet local needs (*i.e. housing numbers*) or demonstrate housing supply during this plan period.
- There is agreement that this location is not a sustainable location for new development. Particularly with regard to transport infrastructure.
- Hertsmere BC believe that “it could be made sustainable through the delivery of an appropriate scale and mix of development and supporting infrastructure” without clarifying what this might be.
- Hertsmere BC will be abolished in less than 2 years but wishes to consider the benefits and opportunities that could be secured in a wider context of at least thirty years.
- The proposed location spanning both sides of Coursers Road will inevitably lead to coalescence with both Colney Heath and London Colney, irrespective of any immediate proposals for defensible boundaries.
- The proposal identifies high-value environmental assets at risk, including Redwell Wood SSSI, Ancient Woodland, and the Tyttenhanger Stream corridor.
- The settlement is in an area that will suffer significant increases in traffic volumes because of the Strategic Rail Freight Interchange, which is currently under construction.

6.7.7 The Parish Council therefore objects to the site on the following grounds:

- The settlement is not needed to meet the housing needs identified for the plan.
- The settlement is not in a sustainable location.
- In the light of the strained transport infrastructure and the impending traffic increase from the SRFI, the location cannot be made sustainable without prohibitive levels of investment in the surrounding road and transport infrastructure.
- No special circumstances have been established for the loss of green belt and the environment surrounding Redwell Wood SSSI, the Ancient Woodland, and the Tyttenhanger Stream corridor. All of which are an important part of the rural hinterland of London Colney.
- The likely coalescence of any settlement with Colney Heath and London Colney, undermining the distinctive characters of these settlements.
- The long-term nature and wide geographic impact of the proposal make it inappropriate for a plan under development by HBC in its final 24 months.

- 6.7.8 Should the proposal be brought forward to the regulation 19 plan then the Parish Council consider it essential that a full and detailed analysis of the infrastructure required to make the site sustainable is included with the documentation. In line with policy this should include cumulative impact of development including within the Borough and neighbouring local authority areas. Therefore, the Parish Council deems that this would need to include the Radlett SRFI.

6.8 Hertfordshire County Council

- 6.8.1 Hertfordshire County Council (HCC) submitted two responses, one in their capacity as the county council and lead authority for matters including education and highways, and one in HCC's capacity as a landowner.
- 6.8.2 The first was a detailed 132-page representation, combining general comments and more detailed comments from various relevant services within HCC. Below, we provide a summary of key recommendations made by HCC for HBC and their emerging Local Plan by theme. Recommendations were also shared with specialists preparing the Local Plan evidence, where comments are relevant (e.g. the Infrastructure Delivery Plan, Transport Assessment etc), to take into account in more detail.
- 6.8.3 In summary HCC's representation recommends that HBC:
- Embed health, wellbeing, and sustainability throughout the Local Plan.
 - Strengthen transport, education, and community infrastructure policies to support projected growth.
 - Safeguard and expand waste, flood, and specialist housing facilities.
 - Integrate nature recovery and biodiversity priorities.
 - Ensure site-specific policies address connectivity, heritage, and environmental risks.
- 6.8.4 These recommendations are aimed at helping to deliver a robust, inclusive, and sustainable Local Plan for Hertsmere, aligned with national and local guidance. Below we have listed HCC recommendations to HBC by theme.
- 6.8.5 On Health & Wellbeing:
- Embed health and wellbeing as a central theme in the Plan's Vision and Strategic Objectives, using local health evidence and the Hertfordshire Healthy and Safe Places Framework.
 - Strengthen policies on healthy community infrastructure, ensuring facilities are within walking distance and accessible by active travel/public transport.
 - Include health impact assessments consistent with Hertfordshire's Health Impact Assessment Position Statement; refuse planning permission for proposals causing unacceptable harm to public health.
 - Add policy controls for hot food takeaways near primary schools, alcohol premises, and age-friendly design.

- Prioritise healthy housing, addressing indoor air quality, thermal comfort, low-carbon/energy-efficient housing, and pollution reduction.
- Incorporate indicators from the Healthy and Safe Places Framework in performance monitoring.

6.8.6 On Transport & Connectivity:

- Develop a borough-wide transport strategy to mitigate impacts of Local Plan development.
- Conduct cumulative testing on highways impact for candidate sites.
- Secure deliverable packages of highways infrastructure in plan policy.
- Reference Hertfordshire Local Transport Plan, Place and Movement Planning Guide, and Developer Infrastructure Contributions Guide.
- Enhance public rights of way and integrate them into relevant policies.
- Prioritise sustainable transport, active travel, and high-quality connections to public transport in site-specific policies.

6.8.7 On Education & Childcare:

- Identify and allocate sites for new secondary schools, especially in the west of the borough.
- Secure land for primary schools in major developments (e.g., Well End Strategic Urban Extension, Bowmans Cross).
- Plan for sufficient childcare settings based on projected demand; ensure flexibility in delivery.
- Include criteria for new children's homes and supported accommodation for vulnerable groups.
- Engage with neighbouring authorities to address cross-area school demand.

6.8.8 On Adult Social Care & Specialist Housing:

- Disperse delivery of older persons' housing across settlements, based on population needs.
- Undertake viability testing for site typologies.
- Incorporate specialist housing (extra care, nursing homes, supported living) in allocations, following locational criteria.
- Set clear affordable housing expectations for housing-with-care schemes.

6.8.9 On Waste Management & Flooding:

- Expand and modernise recycling centres (Potters Bar, Elstree) to meet growth demands.
- Safeguard existing waste management sites; clarify intentions for facilities adjacent to new allocations.
- Require Site Waste Management Plans for all major developments.
- Address flood risk in site allocations, referencing Lead Local Flood Authority recommendations.

6.8.10 On Natural Environment & Biodiversity:

- Integrate the Hertfordshire Local Nature Recovery Strategy (LNRS) into spatial strategy and site allocations.
- Avoid harm to priority biodiversity areas; contribute to habitat creation/restoration.
- Embed nature recovery within strategic allocations and green infrastructure networks.
- Align biodiversity net gain delivery with LNRS priorities.

6.8.11 On Community Infrastructure & Libraries:

- Secure contributions for improvements and modernisation of libraries, especially Oakmere Library (Potters Bar).
- Use new community spaces for youth work and reflect this in policy.
- Monitor and expand youth services to meet demand from growth.

6.8.12 On Fire & Rescue:

- Ensure relocation of fire stations if sites are redeveloped; maintain service delivery.
- Seek planning obligations for fire and rescue services via S106/CIL.
- Design developments for fire safety, including water supply, hydrants, and emergency access.

6.8.13 On Site-Specific Recommendations:

- For each candidate site, ensure high-quality pedestrian/cycling connectivity, enforceable travel plans, and integration with public transport.
- Address heritage, flood, minerals, and waste issues at planning application stage.
- Safeguard and expand recycling centres where necessary.
- Require archaeological assessments for sites with heritage potential.

6.8.14 HCC's second representation, **in its capacity as a landowner**, is a shorter letter focused on HCC's promotion of several sites for residential and mixed-use development, including the following key sites: Elstree Way Clinic, Cheeky Monkeys Nursery & former Library, Borehamwood (HBA SA4); Borehamwood Fire Station, Borehamwood (HBA SA9); and Land South of Watford Road & West of New Road, Radlett (HRA SA4). HCC also promoted other sites not currently included as residential candidate sites.

6.8.15 In summary, HCC's main recommendations urge HBC to be more flexible in its settlement and Green Belt policies, to include more HCC-owned sites for development, and to make practical adjustments to support community infrastructure and sustainable growth. HCC expresses strong support for the inclusion of its key sites and commits to ongoing engagement as the Local Plan progresses.

6.8.16 Key Recommendations by HCC in its capacity as a landowner include:

- **Vision & Strategic Objectives:** HCC supports the need for an up-to-date Local Plan and agrees it must be demonstrably sound. However, HCC disagrees with the proposed settlement hierarchy, recommending that some development should be included in Category V villages (e.g., Elstree, South Mimms), where HCC owns suitable land.
- **Expand Settlement Hierarchy:** Allow development in Category V villages (Elstree, South Mimms) on HCC-owned land.
- **Green Belt Review:** Reconsider sites with weak Green Belt contribution (Edgewarebury Farm, Sunnybank School) for residential allocation.
- **Spatial Strategy Adjustments:** Include HCC sites in the growth strategy, especially for supported living and emergency services relocation.
- **Site-Specific Support:** Endorsement of HBA SA4, HBA SA9, and HRA SA4 as residential candidate sites, with practical recommendations for re-provisioning community uses and boundary updates.
- **Further Technical Work:** Commit to providing additional technical evidence and feasibility studies for promoted sites at later stages.
- **More specific recommendations are listed below.**
 - On Green Belt Assessment, HCC disagrees with HBC's approach, arguing that some HCC-owned sites (e.g., Edgewarebury Farm, Sunnybank School) make a weak contribution to the Green Belt and should be considered for development.
 - On the subject of Spatial Strategy, HCC does not support the proposed spatial strategy, recommending that development be allowed in Category V villages, especially on sustainable, accessible HCC-owned land. HCC suggests Edgewarebury Farm could provide supported living housing, and Popes Farm could facilitate relocation of Potters Bar Fire Station.
 - Specifically on the Borehamwood Area, HCC voiced their support for the spatial strategy for Borehamwood, especially the identification of the Elstree Way Employment Corridor as a key regeneration area. HCC supports the inclusion of HBA SA4 and HBA SA9 as residential candidate sites.
 - Regarding Potters Bar Area, HCC does not support the approach for Potters Bar, recommending that the former Sunnybank Primary School site (previously developed land in the Green Belt) be included for development. HCC notes that part of this site is already being redeveloped for a SEND school.
 - For Radlett Area, HCC supports the approach for Radlett and the inclusion of HRA SA4 as a residential candidate site, but requests boundary amendments to reflect changes in land use.
- **On Candidate Site details,** HCC provides detailed comments and supports the inclusion of its sites as residential candidate sites. For Borehamwood Fire Station (HBA SA9), HCC notes the need for re-provision of the fire station, ideally close to the strategic road network. For Radlett (HRA SA4), HCC highlights the need for further technical studies and boundary adjustments.

- In conclusion, HCC welcomes the inclusion of its promoted sites and will provide further information at the Regulation 19 publication stage.

6.9 Neighbouring Local Authorities

6.9.1 Representations were received from the following neighbouring authorities:

- London Boroughs of Enfield, Barnet, and Harrow
- Welwyn Hatfield Council
- St Alban's District Council
- Watford Borough Council and
- Three Rivers District Council

6.9.2 **London Borough of Enfield (LBE)** Council submitted a brief single document representation, focusing particularly on the subjects of green belt, strategic urban extensions, data centres and the modern knowledge economy, sustainable travel and transport, with a focus on cross-boundary development and shared interests, particularly in Potters Bar near the Enfield border. In summary, LBE expresses:

- Support for Hertsmere's initiative to develop an up-to-date Local Plan, especially their commitment to sustainable growth and meeting housing needs, including Gypsy and Traveller Accommodation, within Hertsmere's boundaries.
- Concern that Hertsmere's Green Belt Assessment includes land within Enfield's boundary, requesting further officer-level discussions before conclusions are used for planning.
- Request for more information about the proposed allocation of SA12 Land rear of Park Avenue, Potters Bar, which is near the shared boundary and within the Green Belt.
- Encouragement for Hertsmere to consider higher housing densities for strategic urban extensions, with a focus on design quality.
- A request for Enfield to be kept informed about any new settlements or 'New Towns' near the boundary.
- Welcoming Hertsmere's efforts to plan for the modern knowledge economy, including data centres, and a suggestion for a robust policy to guide appropriate locations and resist speculative proposals.
- Encouragement of further engagement on planning for higher education and scientific facilities.
- Support for sustainable transport initiatives, including public transport, walking, cycling, and car-lite development, to improve air quality and climate outcomes, looking forward to more detailed policies as Hertsmere's plan progresses, especially in light of upcoming national policy changes.
- Commitment to ongoing collaboration with Hertsmere on cross-boundary issues and encouragement of further meetings to discuss key matters, especially the Green Belt.

6.9.3 London Borough of Barnet's (LBB) brief single document representation, in summary, is broadly supportive of the HBC Plan but highlights the need for robust cross-boundary cooperation on housing, Green Belt, and especially transport issues. LBB emphasises the importance of evidence-based planning, sustainable transport solutions, and ongoing engagement to ensure that growth in Hertsmere does not negatively impact Barnet's communities, infrastructure, or environment, expressing:

- Support for Hertsmere's plan to deliver at least 16,160 homes, including the commitment to meet its own housing needs in full and avoid reliance on neighbouring authorities.
- Support for minimising Green Belt release by focusing growth within urban areas but stressing the importance of consistent Green Belt assessment methodologies across boundaries and ongoing engagement with partners like the Greater London Authority.
- Requesting further information and engagement regarding housing allocations near LBB's boundary, particularly to monitor and mitigate cross-boundary impacts on transport, infrastructure, and local services.
- Highlighting the need for robust, cross-boundary transport planning, with LBB opposing any increase in strategic road capacity within its area and calling for sustainable travel options to be prioritised.
- Noting the scale of proposed employment allocations near the LBB boundary and requesting further information on transport and labour market impacts, with particular attention to cumulative effects on local and strategic networks.
- Requesting continued engagement and information sharing as key evidence (such as the Transport and Movement Assessment and Car Park Study) becomes available, to ensure that growth in Hertsmere does not negatively impact Barnet's communities or infrastructure.

6.9.4 London Borough of Harrow (LBH)'s representation document focused on cross-boundary impacts, housing and employment land strategy, Green Belt considerations, and evidence base clarity. In Summary, LBB expresses:

- Support for HBC's housing and employment objectives but raises concerns about Green Belt releases, evidence base clarity, and cross-boundary impacts.
- Request for ongoing dialogue and detailed justification for candidate site selection and infrastructure planning.
- Broad support for the geographical distribution of new homes but notes uncertainty about the exact plan period.
- Concerns about reliance on Green Belt land release to meet housing targets; any such release must comply with NPPF requirements.
- Concern regarding perceived lack of clarity of evidence base (HELAA 2025, Green Belt Assessment 2026) on planning constraints and the rationale for candidate site selection. Previous assessments (2019) found many sites performed strongly against Green Belt purposes, but the 2026 assessment now identifies some as "Grey belt."

- Request for further clarity on which evidence is used for site selection and justification for site deliverability and developability.
- Highlighting potential impacts on infrastructure, especially increased vehicular movements on major roads (A5, A41) on Green Belt sites near LBH boundary.
- Objection specifically to candidate site HBUSA SA6 (Bushey), which is directly on the boundary and within Green Belt. Previous reviews did not recommend it for development and exceptional circumstances for Green Belt release are not fully evidenced.
- Emphasis on importance of Green Belt for separation between London and Hertsmere and expectation for most adjacent parcels to remain protected unless circumstances change significantly.
- Support for additional employment opportunities near the boundary (including employment site HEM SA04 (Extension to Lismirrane Industrial Park), subject to planning considerations.
- Welcoming continued collaboration with Hertsmere to address strategic cross-boundary matters, seeking further discussion on evidence, exceptional circumstances for Green Belt release, and infrastructure impacts.

6.9.5 Welwyn Hatfield Borough Council (WHBC) submitted a brief single document response, focused on the Plan's overall approach and cross-boundary matters, southern Welwyn Hatfield sites and Potters Bar, the new settlement at Bowmans Cross, as well as infrastructure, viability and further technical work, which can be summarised as WHBC:

- Commitment to continued collaborative working with HBC as respective Local Plans progress.
- Recommendation that ongoing engagement should focus on ensuring that all cross-boundary impacts are thoroughly understood and mitigated, and that future growth is planned in a positive, sustainable, and highly coordinated manner.
- Recognition of the critical importance of establishing an up-to-date, planned framework that is sound, legally compliant, and capable of managing growth sustainably.
- Welcoming Hertsmere's commitment to meeting its OAN for housing in full and agreement that unmet housing needs have the potential to place pressure on neighbouring areas.
- Support for the principle that strategically significant growth locations must be supported by robust evidence and effective joint working where cross-boundary impacts may arise.
- Welcoming Hertsmere's emphasis on planning for infrastructure delivery, design-led development, and the optimisation of site capacity as part of its emerging spatial strategy.
- On Southern Welwyn Hatfield Sites and Potters Bar, noting Hertsmere's representations regarding sites at the southern periphery of WHBC, specifically HEL 5 (Leggatts Park), HEL 7 (Land at Swanley Bar), and HEL 49 (Land south of Hawkshead Road);

- Acknowledgement that these sites have a strong functional relationship with Potters Bar and recognising that development in these locations, in conjunction with candidate sites HPBA 12, 13 & 14 put forward by Hertsmere, could significantly influence the role, function, and infrastructure networks of the wider Potters Bar area.
- Confirming that the future progression of these sites will remain subject to close engagement with HBC to ensure consistency in scale, design quality, and the delivery of coordinated infrastructure and placemaking.
- Noting HBC's identification of Bowmans Cross as a potential new settlement intended to support long-term growth beyond the current plan period.
- Acknowledging Hertsmere's position that Bowmans Cross may not be required to meet the plan-period housing requirement and is instead a strategic opportunity for growth beyond the plan period.
- Recognising the significant future housing pressures across Hertfordshire and, given WHBC's own longer-term needs from the mid-2030s onwards, offering provisional support in principle for Bowmans Cross forming part of the wider area's long-term housing strategy. This includes the potential for the settlement to contribute to meeting some of the future housing needs of the new combined authority of which WHBC may form part, noting that Bowmans Cross may ultimately fall within a new administrative area which may include what is currently Welwyn Hatfield.
- Conditioning that any such support is strictly subject to the development achieving a scale capable of delivering a viable, self-sustaining settlement with shops, services, education provision and significantly enhanced public, active and sustainable transport infrastructure.
- Noting that Bowmans Cross is not currently a sustainable location for growth but could become one with major investment.
- On Infrastructure, Viability, and Further Technical Work, maintaining that further joint technical assessment is essential to fully grasp the transport, education, and wider infrastructure implications arising from cumulative growth in Hertsmere, particularly at Potters Bar and Bowmans Cross. WHBC welcomes the opportunity for ongoing engagement with HBC and HCC to address these requirements through the Duty to Co-operate framework.

6.9.6 St Alban's District Council (SADC) submitted a detailed and technical response, focusing on the need for robust evidence, realistic delivery plans, and meaningful engagement with affected communities. The Council's position on Bowmans Cross is clear: it does not support the allocation in its current form and sees substantial barriers to its deliverability and sustainability. SADC's support for employment land and the creative sector is positive, but contingent on further evidence and regional cooperation. SADC's views can be summarised as:

- Welcomes continued constructive engagement with HBC through the Duty to Cooperate process and looks forward to further meetings as the Local Plan progresses. SADC requests that HBC actively consults with London Colney and Colney Heath residents and Parish Councils, keeping them

and SADC fully informed and engaged, including through public consultation events within St Albans district.

- Confirms it currently has no capacity to meet any of HBC's housing needs due to limited land outside the Green Belt and high housing targets set by the Government's standard method. SADC expects HBC to demonstrate it has fully explored all reasonable options for meeting its own housing need within the Borough, given the Green Belt constraints across South West Hertfordshire.
- Raises significant and longstanding concerns regarding the proposed Bowmans Cross site, citing its poor location with limited access to strategic road and rail networks, employment, and facilities, dependence on road access, with insufficient evidence of how sustainable transport and infrastructure will be delivered, low scores in previous transport and accessibility assessments, reinforcing the need for truly transformational investment in infrastructure, concerns over deliverability, phasing, and the significant constraints posed by ongoing mineral extraction and waste operations and critical importance of maintaining a Green Belt boundary at Coursers Road, with no built development north of this line to ensure separation from Colney Heath.
- Expects a significant proportion of affordable housing nomination rights at Bowmans Cross to be agreed with SADC, reflecting the proximity to St Albans communities. This was previously acknowledged by HBC and should be retained in future versions of the Plan.
- Generally supports proposals to grow employment opportunities in the key Hertfordshire TV and film sector and may be able to support the collective South West Herts need for employment land, subject to further evidence and updates.
- Highlights the need for a comprehensive and realistic infrastructure delivery plan, including major investment in transport (public and active travel), utilities, and community facilities. SADC notes the lack of current evidence on transport impacts and expects significant further work to address existing congestion and ensure sustainable travel options.
- Expresses concern about the scale of Green Belt release at Bowmans Cross, the narrowing of the Green Belt between Colney Heath and the new settlement, and the need for exceptional circumstances to justify such changes. SADC also requests significant tree planting and enhancement of the Watling Chase Community Forest.

6.9.7 Watford Borough Council (WBC) submitted a concise response, focusing on the Plan's overall approach and cross-boundary matters, including housing need and capacity, secondary school provision, the candidate site at Bushey Golf and Country Club, and issues of connectivity and sustainable transport. The key points from WBC's response can be summarised as follows:

- Welcomes the opportunity to comment on the Draft Hertsmere Local Plan and recognises the importance of coordinated and sustainable development across Hertfordshire. WBC has previously engaged in the Regulation 18 consultation process and Duty to Cooperate discussions

and looks forward to continuing constructive cross-boundary working as the Plan progresses.

- Acknowledges the challenges local authorities face in meeting the standard method housing need. Notes positively that Hertsmere has identified sufficient candidate sites to meet its housing target in full. WBC confirms that, following a robust assessment of land in Watford, there is no suitable or available capacity within Watford to assist Hertsmere with any future housing shortfall.
- Highlights an identified need for new secondary school provision to serve Watford, Bushey, and Radlett, as previously raised by HCC and the South West Herts Strategic Infrastructure Baseline Study (2024). WBC notes this need does not appear in the draft Plan and requests that, if required, it be considered as part of Hertsmere's development strategy, as there are no suitable sites in Watford for this provision.
- Comments on Candidate Site SA7, located within the Green Belt between Bushey and Oxhey (in Watford borough). WBC welcomes the reduction in the site's size compared to the 2024 plan, as this minimises the risk of coalescence between Bushey and Oxhey. Stresses that preventing coalescence must remain a key consideration for any development on this site.
- Supports references in the draft Plan to maintaining strong relationships between Bushey and Watford, particularly in employment and education. Supports proposals to improve walking, cycling, and public transport between Bushey and Bushey station (in Watford), and suggests further reference to improving walking and cycling accessibility to Watford Town Centre, in line with ambitions in the Watford Local Plan and the Local Cycling and Walking Infrastructure Plan (LCWIP).

6.9.8 **Three Rivers District Council** submitted a response giving general commentary on the plan approach and expressing broad support for policies regarding housing provision and safeguarding of key employment areas. The District Council's response can be summarised as follows:

- Agreement with the requirement for a new Local Plan and strong support towards Hertsmere's efforts to sustainably fulfil its housing needs. Agreement that the test of the plan's soundness finds it is positively prepared, justified, effective and consistent with national policy.
- The Council encourages collaboration on key cross-boundary issues and strategic matters to strengthen the soundness of each area's emerging Local Plan.
- Support for Hertsmere meeting its own employment land requirements and growth of the media and film cluster.
- Support for the focus on sustainable travel networks, including the Hertsmere LCWIP, which is in line with the NPPFs focus on achieving sustainable development.
- Suggest the spatial strategy could be clearer on overall housing numbers.

6.10 Other Prescribed Consultation Bodies

6.10.1 **Natural England** submitted a detailed response addressing the Local Plan's evidence base, legal compliance, and the need for further technical work, with a particular focus on the protection of designated sites, water resources, biodiversity, green and blue infrastructure, and the assessment of potential impacts on sensitive habitats. Their comments also cover site-specific allocations, the Habitats Regulations Assessment, and recommendations for policy strengthening, which can be summarised as follows:

- Welcomes the opportunity to comment and recognises the ambition for a joined-up approach with adjacent authorities. However, Natural England's main concern is that the Plan is not currently supported by sufficient evidence to demonstrate that growth will not adversely affect the integrity of Habitats Sites, particularly through water and recreational pressure. They urge Hertsmere to gather outstanding evidence, update the Habitats Regulations Assessment (HRA) and Sustainability Appraisal, and warn that failure to do so may risk the Plan being found unsound at examination.
- Supports the Plan's vision and strategic objectives, but recommends greater emphasis on the natural environment, including integration of Hertfordshire's Local Nature Recovery Strategy (LNRS), investment in blue and green infrastructure, protection of chalk streams, woodland, biodiversity, and climate resilience.
- The spatial strategy's focus on sustainable growth patterns and urban regeneration is generally supported, subject to robust protection and enhancement of designated sites and wider biodiversity. Recommends strengthening policy wording in line with the Sustainability Appraisal and their advice.
- Welcomes placemaking and inclusive design and encourages integration of green infrastructure and species-friendly features (e.g. nest boxes, permeable barriers for hedgehogs, flower-rich gardens). Major allocations should contribute to LNRS enhancement measures and celebrate local natural history.
- Supportive of urban redevelopment and extensions, Natural England encourages integration of green infrastructure and preservation of Green Belt openness. Policies should seek environmental benefits such as landscape enhancement, habitat creation, and improved access to nature.
- Welcomes environmental impact requirements for employment sites, including Biodiversity Net Gain, Urban Greening, SuDS, and public realm. They recommend emphasis on water efficiency, especially in water-scarce areas and sensitive sites, and integration of high-quality habitats in employment greenspace standards.
- Generally supportive of the Green Infrastructure Network and connecting people with nature. Encourages evidence-based policies, referencing their Green Infrastructure Framework and standards, and recommends participation in the Nature Towns and Cities Accreditation scheme.
- Provides specific advice on major allocations:

- Bowmans Cross: Working with developers to mitigate impacts on Redwell Wood SSSI, expecting provision of high-quality alternative natural greenspace.
 - Water End Swallow Holes SSSI: Allocations within the Impact Risk Zone require further consultation and mitigation measures.
 - Redwell Wood SSSI: Employment allocations should implement strict water retention standards and consult Natural England.
 - Bentley Priory SSSI/LNR: Employment sites must adhere to water standards and consult Natural England.
 - Chilterns National Landscape: Strategic and criteria-based policies needed to protect and enhance valued landscapes, with reference to relevant Management Plans. Allocations within the Bushey and Radlett area should include requirements for delivery aligned with landscape policies.
- Disagrees with the HRA screening conclusion and requires further assessment, including a Water Cycle Study, to rule out significant impacts on Hoddesdon Park Woods SAC and Lee Valley SPA/Ramsar. They are generally satisfied with the SA approach but recommend updates to reflect HRA findings and address biodiversity, water, and air quality risks.
 - Supports dedicated climate policies and recommends reference to their Green Infrastructure Framework for climate resilience. They support air quality improvement requirements, expect strategic flood risk management, and recommend tighter water efficiency standards and phased development to ensure environmental capacity is not exceeded.
 - Welcomes bespoke BNG policy and suggests a more ambitious target above the national minimum, provided it is evidence-based. Policies should follow the mitigation hierarchy and use the Statutory Biodiversity Metric for site selection.

6.10.2 National Grid Electricity Transmission (NGET) submitted a detailed response, highlighting the need to safeguard existing transmission assets, support for future network reinforcement and expansion (including the Great Grid Upgrade), and the importance of early engagement on development proposals near NGET infrastructure. Their submission also addresses site-specific interactions with proposed allocations, the operational requirements for Abnormal Indivisible Loads (AILs), and the balance between infrastructure needs and environmental designations, which can be summarised as follows:

- Emphasises the importance of safeguarding all existing NGET transmission assets (overhead lines, underground cables, substations) and access routes, ensuring development proposals do not compromise safety, operability, maintenance, or future expansion.
- Requests that the Local Plan supports future reinforcement and expansion of the transmission network, including the Great Grid Upgrade and other strategic infrastructure projects, to facilitate the UK's transition to net zero and the connection of new renewable energy sources.
- Advises that development proposals near NGET assets must demonstrate no adverse impact on safety, maintenance, or network expansion.

Recommends policies require developers to address NGET's design guidance at the masterplanning stage.

- Stresses the need to safeguard access routes for the delivery and removal of large equipment, and to resist development or highway changes that would constrain AIL access unless suitable alternatives are secured.
- Identifies several candidate sites crossed by or adjacent to NGET assets, including Organ Hall Farm, Bushey Hall Golf Course, and others. Requests that Local Plan policies for these sites acknowledge and address the presence of NGET infrastructure.
- Notes that parts of NGET freehold land are included within Local Wildlife Site designations. Requests that policies recognise the operational need for future expansion of NGET assets within their freehold land, balancing ecological value with infrastructure requirements.
- Provides links to technical guidance on development near NGET assets and encourages early engagement with NGET to resolve potential issues. Offers ongoing advice and requests to be included in future consultations.

6.10.3 **The Environment Agency (EA)** submitted a detailed response focused on ensuring the soundness of the Local Plan, with particular emphasis on flood risk, water resources, land contamination, biodiversity, and the safeguarding of waste and water infrastructure. Their submission can be summarised as the follows:

- Expressed that further technical work is required for the Local Plan to be found sound, specifically calling for an updated Strategic Flood Risk Assessment (SFRA), Level 2 SFRAs for sites in the flood plain, and evidence that the sequential and exceptions tests have been carried out for those sites. The EA also requested to review the actual wording of policies to ensure effectiveness and alignment with national policy.
- Welcomed the Plan's intention to minimise and manage flood risk, but highlighted the need for up-to-date flood modelling, freeboard guidance, and the use of higher climate change allowances for major developments. Emphasised that future flood risk, including climate change impacts, must be fully considered in all allocations.
- Recommended that buffer zones along watercourses should be at least 10 metres, designed and managed for biodiversity, and supported by long-term management plans. Supported the de-culverting of watercourses and restoration of natural river channels and requested that water quality be included as a separate policy.
- Highlighted the importance of the Water Framework Directive (WFD) and River Basin Management Plans, recommending that development proposals must not cause deterioration of water bodies and should support the achievement of good ecological status. Requested that WFD Assessments be required for any development affecting water bodies.
- Supported the focus on water efficiency in new developments, recommending that all new residential schemes meet the higher water efficiency standard (110 litres per person per day) and that commercial schemes achieve BREEAM 'excellent' for water. Encouraged policy to

require retrofitting for water efficiency in refurbishments and changes of use.

- Stressed that Sustainable Drainage Systems (SuDS) should be used wherever possible but must not be sited in contaminated ground or where they could mobilise pollutants. Called for SuDS policy wording to ensure no negative impact on groundwater quality and referenced best practice guidance.
- Provided detailed site-specific comments, especially for sites in the flood plain, near water bodies, or on/adjacent to historic landfill. Highlighted the need for robust risk assessments and potential permitting requirements for development on or near waste management facilities, such as Tyttenhanger Landfill and the North London Anaerobic Digestion Facility, recommending substantial buffers and ongoing engagement with the EA.
- Recommended that development proposals in Source Protection Zones (SPZs) be subject to additional constraints, including robust Foundation Works Risk Assessments for piled foundations, and consultation with abstraction licence holders where relevant.

6.10.4 **Historic England** submitted a detailed response focused on the integration of the historic environment into the Hertsmere Local Plan, with particular emphasis on policy wording, site allocations, and the need for robust evidence and Heritage Impact Assessments (HIAs). Their submission can be summarised as follows:

- Welcomed the inclusion of strategic policies for the historic environment, designated heritage assets, and non-designated heritage assets, supporting the Council's positive approach to heritage conservation.
- Stressed the importance of ensuring that all sites proposed for allocation are sufficiently understood and justified in terms of their potential impacts on the historic environment. Reminded the Council of its responsibility to integrate heritage considerations fully into site selection and policy development.
- Highlighted the critical need for Heritage Impact Assessments (HIAs) to be prepared and finalised in advance of Regulation 19, so that site assessment and selection are properly informed, and site-specific criteria for mitigation and enhancement are identified and embedded in allocation policies.
- Recommended that policy wording should reference specific designated heritage assets both on site and nearby, and explicitly include mitigation measures such as landscaping, careful design, maintaining key views, and buffers/setbacks, as identified by HIAs. Suggested that technical terms like "significance" and "setting" be defined in a glossary for clarity.
- Provided site-specific comments and recommendations for numerous allocations, including sites adjacent to or containing listed buildings, conservation areas, scheduled monuments, or registered parks and gardens, where development could affect the significance of these assets through changes to their settings.
- Called for HIAs to determine site suitability, inform design and layout, and secure mitigation and enhancement measures through site-specific policy.

wording. For sensitive sites, recommended open buffers with rural character and avoidance of urbanising features.

- Emphasised that built development has the potential to affect heritage assets, but substantial scope exists to avoid and mitigate impacts through appropriate policy measures and planning processes. The most effective way to explore mitigation is through detailed HIAs, with recommendations clearly reflected in site-specific policies.

6.10.5 **Sport England** submitted a detailed response focused on green infrastructure, sports facilities, and the policy approach to golf courses, which can be summarised as follows:

- Welcoming the inclusion of policies GI1, GI2, and GI3, recognising that green infrastructure and open space provide major opportunities for physical activity and encompass most outdoor sports facilities. However, Sport England raised concerns about paragraph 9.3.5 relating to policy GI3, which implies that golf courses may be considered for release for development. Sport England emphasised that the Council's approach should be informed by its evidence base in the Playing Pitch Strategy and that decisions on releasing golf courses should be made on a site-by-site basis, not through a generic approach.
- Warning of the risk that landowners and operators may close or run down viable golf courses if a favourable approach to development is perceived. The Playing Pitch Strategy identifies only six operational golf courses in Hertsmere, with demand high and membership levels above national averages. The strategy does not suggest any are unviable or surplus to requirements. Sport England would object at Regulation 19 if a generic approach supporting development on golf courses contradicts the Council's evidence base, as this would not be consistent with paragraph 104 of the NPPF.
- Supporting the proposed content of policy SD1 in principle and requesting that the policy explicitly sets out the role of promoting active travel and utilising green infrastructure to tackle climate change. Sport England's "Uniting the Movement" strategy recognises its contribution to climate change mitigation by influencing how people live and travel.
- For HPBA SA11 Land at Mutton Lane (north), a site of approximately 1,875 dwellings, Sport England requested a policy requirement for on-site provision of sports facilities, as the additional demand cannot be met by improving nearby facilities. An open space, sport, and recreation strategy should be prepared to support development proposals and align with an approved masterplan, providing a strategic framework for future planning applications. This approach is justified by the Council's sports evidence base, emerging policy SCI3, and NPPF paragraph 103.
- For Bowmans Cross New Settlement (approximately 4,000 dwellings in option 1 or 7,500 dwellings in option 2), Sport England requested a policy requirement for both outdoor and indoor formal sports facility provision on-site, especially given limited existing provision nearby. An open space, sport, and recreation strategy should also be prepared to support development proposals and align with an approved masterplan, justified by the Council's sports evidence base, emerging policy SCI3, and NPPF paragraph 103.

6.10.6 National Highways provided a brief representation focused on the implications of the Hertsmere Local Plan for the Strategic Road Network (SRN), with particular emphasis on safeguarding network operation, sustainable development, and the importance of ongoing engagement. Their submission can be summarised as follows:

- Emphasised the need for the Local Plan to maintain the safe and efficient operation of the SRN, particularly in relation to the M1 J5 and mainline, M25 J22, M25 J23/A1(M) J1, and the A1 Barnet By-pass to Rowley Lane, all located within Hertsmere.
- Supported the Plan's policies to encourage modal shift and reduce private car use, referencing DfT Circular 01/2022, and encouraged Hertsmere to incorporate measures that reduce traffic generation at source and focus development in sustainable locations.
- Requested early consultation on any proposed improvement works to the SRN and on planning applications for major developments likely to generate significant delivery or construction traffic, as these are most likely to impact the SRN.
- Noted that several residential candidate site allocations (e.g., HPBA SA12 and SA14 near M25 J24; SA4, SA5, SA6, and SA8 near M1 J5) are adjacent to or near the SRN and requested to be consulted on these as they progress to assess full impacts on the network.
- Stressed the importance of a robust evidence base to assess cumulative impacts on the SRN, as required by DfT Circular 01/2022, and welcomed further dialogue as the Plan progresses, including at Regulation 19 stage when more detailed infrastructure assessments will be available.
- Drew attention to their guidance document 'Planning for the Future: A guide to working with National Highways on planning matters' (October 2023) and reiterated their commitment to supporting the preparation of sound local plans that enable sustainable development.

6.10.7 Thames Water submitted a detailed response focused on the implications of the Hertsmere Local Plan for water supply and wastewater infrastructure, with particular emphasis on site-specific capacity assessments, policy wording, and the need for phasing to align development with infrastructure delivery. Their submission can be summarised as follows:

- Conducted a high-level RAG (Red-Amber-Green) assessment of potential impacts of draft site allocations on the wastewater network, noting that the position can change as network conditions evolve and details of development scale and connection points are confirmed.
- Highlighted site-specific concerns for HRA SA3 (Land North of Watford Road and East of Kemprow, Radlett), noting that Blackbirds Sewage Treatment Works lies close to the northern boundary of the proposed allocation and that future development would need to consider potential amenity impacts on residents, including noise, vibration, odour, light and flies. Requested that a policy be included in the Local Plan to ensure consistency with paragraph 200 of the National Planning Policy Framework, requiring proposals to demonstrate that amenity of existing residents will not be affected and that existing uses should not have unreasonable restrictions placed on them.

- Recommended that Policy SD7 (Flood Risk) should require all forms of flood risk to be considered, including sewer flooding, as new development has potential to overload existing sewers. Suggested that development may need to be phased to align with network improvements and that the policy should promote use of SuDS following the drainage hierarchy, avoiding discharge of surface water to combined sewer networks.
- Supported the content of Section 10.8.2 and Policy SD8 (Water Supply and Wastewater), noting that where network upgrades are necessary, phasing conditions could be used to ensure occupation of development aligns with delivery of infrastructure to mitigate the risk of sewer surcharging. Recommended that policy wording should explicitly support this approach.
- Emphasised the importance of water efficiency in new development, noting that the area is located in a water-stressed region and that all development should apply the optional standard of 110 litres/person/day. Recommended that conditions should require water efficiency to be calculated using the 'fittings based approach' rather than the calculation method, as data from smart meters indicates actual consumption ranges from 120-179 litres/person/day when the calculation method is used.
- Provided commentary on Policy HQD7 (Building Alterations), noting that basement development connected to the foul sewer network will be at greater risk of sewer flooding from surcharging sewers. Recommended that all basement development should be required to be fitted with a positive pumped device to reduce flooding risk, and that wording to this effect should be included in the policy and supporting text in the submission version of the Local Plan.
- Attached a comprehensive RAG assessment spreadsheet covering all proposed site allocations, with all sites assessed as discharging to Maple Lodge Sewage Treatment Works (with one site to Mogden) and noted that modelling for network upgrades will proceed once sites have planning approval and there is certainty of development coming forward, with upgrades potentially taking 18 months to 3 years to plan and deliver.

6.10.8 **Affinity Water** submitted a detailed response focused on the promotion of two sites for employment-led or mixed-use development, as well as the alignment of their proposals with national and local planning policy. Their submission can be summarised as follows:

- Formally promoted Land at the South West Side of Bushey Mill Lane, WD23 2AB (approx. 28.6 ha) as a candidate employment allocation, highlighting its substantial size, deliverability, and potential to contribute to the Borough's future employment land supply. The site benefits from strong strategic connectivity, proximity to urban areas and labour markets, and is not constrained by statutory ecological or heritage designations. Affinity Water emphasised the site's suitability for employment uses, especially given its location within Flood Zones 2 and 3, which favour "less vulnerable" uses such as employment over residential. They also noted opportunities for green infrastructure, flood mitigation, and renewable energy integration. While the site is within the Green Belt, Affinity Water argued that development could be accommodated with limited harm, supported by robust landscape buffers and high-quality

design. They encouraged the Council to expand its evidence base and reconsider the site for allocation, offering further technical evidence as needed.

- Promoted Land Adjoining Bushey Hall Farm, Berry Grove Lane, Watford, WD23 2AB (approx. 13.8 ha) as a logical and sustainable opportunity for employment-led or mixed-use development. The site comprises two parcels bisected by the A4008, with the northern parcel including previously developed land and the southern parcel comprising open field land. Affinity Water highlighted the site's highly accessible location, adjacency to the Otterspool Way Employment Area, and multiple access opportunities. They referenced the site's previous draft allocation for employment and housing, and the Council's Land Availability Assessment, which found it broadly suitable for development with constraints primarily relating to Green Belt policy. Affinity Water argued that evolving national policy, including "grey belt" concepts, and the Borough's housing land supply shortfall strengthen the case for reconsidering the site for allocation. They offered to provide further technical evidence to support allocation and delivery.
- Emphasised that both sites are not subject to overriding environmental or technical constraints, are capable of supporting a range of employment and mixed-use formats and could be delivered in the short to medium term to support economic growth, job creation, and diversification of the Borough's employment land portfolio. Affinity Water requested ongoing engagement with the Council to explore delivery and masterplanning opportunities, and to ensure the sites are robustly assessed as part of the emerging Local Plan.

6.10.9 **NHS CEICB** submitted a comprehensive response focused on the health infrastructure implications of the Hertsmere Local Plan, with particular emphasis on the need for coordinated planning, developer contributions, and the delivery of new and expanded healthcare facilities to support proposed housing growth. Their submission can be summarised as follows:

- Welcomed the opportunity to comment as the prescribed consultation body responsible for commissioning NHS health services for approximately 3.5 million people across the region, including Hertsmere. Highlighted the publication of their five-year strategy, 'Our Way', which prioritises neighbourhood health, preventative care, and integrated local delivery.
- Reviewed the draft Local Plan and Infrastructure Delivery Plan (IDP) to assess the impact of approximately 21,400 new homes on local healthcare needs and infrastructure. Noted that a new settlement at Bowmans Cross would require significant on-site health mitigation if allocated in the future.
- Stated support for a spatial strategy that focuses growth in sustainable locations (Borehamwood, Potters Bar, Bushey, Radlett) but emphasised the cumulative impact of smaller sites on NHS services and the need for health developer contributions via CIL or Section 106 to mitigate these impacts.
- Requested that the Local Plan include a dedicated chapter on 'A Healthy Community' and explicitly define social and community infrastructure to

include all healthcare services and facilities (GP, community, pharmacy, dentistry, ophthalmology, acute healthcare, ambulance).

- Highlighted that all GP surgeries in the borough are already operating at or over capacity, with limited ability to accept new patients. Provided detailed calculations for the additional primary care space and funding required to support new residents, using standard NHS occupancy and space guidelines.
- Identified the need for significant investment and expansion of primary care infrastructure in response to planned growth in all main settlements.
- Outlined recent and planned investments in local GP estate, including new premises and relocations, and confirmed that developer contributions will be sought to offset forward investment in healthcare infrastructure.

6.10.10 NHS Property Services (NHSPS) submitted a detailed response focused on the Plan's approach to health infrastructure, estate management, and sustainable development. Their submission can be summarised as follows:

- Recognition of the critical importance of delivering new and improved healthcare infrastructure to support housing growth, noting that population increases place significant pressure on NHS resources and that new development should make proportionate contributions to healthcare funding.
- Support for planning policies that enable the delivery, modernisation, and protection of essential healthcare infrastructure, recommending early and proactive engagement between the Council and NHS partners to ensure health needs are embedded in the Local Plan and its supporting evidence base.
- Recommendation for a comprehensive policy on healthy places, including requirements for developments to demonstrate how they support healthy lives, address health inequalities, and meet identified local health needs. Suggested cross-referencing health priorities to other relevant policies and inclusion of supporting text detailing general health determinants.
- Request for the Local Plan to recognise health infrastructure as essential infrastructure, with clear mechanisms for securing developer contributions to healthcare provision. Emphasised the need for robust assessment of existing healthcare capacity, identification of mitigation options, and flexibility in how healthcare needs are met (financial contributions, on-site facilities, land, or property).
- Support for the use of Health Impact Assessments (HIA) for major developments, proposals in Air Quality Focus Areas, and health-sensitive uses, recommending the Council set out its own HIA requirements to promote healthy communities.
- Recommendation for the Council to factor healthcare costs into the Local Plan Viability Assessment, ensuring that developer obligations for health infrastructure are appropriately weighted and viable.
- Noted the recent organisational change, with NHS Central East Integrated Care Board (ICB) now responsible for the area, and requested this be reflected in the Local Plan and Infrastructure Delivery Plan.

- Support for policies promoting carbon neutral development, suggesting NHS property could benefit from carbon offset funds to help achieve net zero healthcare provision.
- Recommendation for affordable housing policies to consider the needs of NHS staff, highlighting the importance of affordable accommodation for recruitment and retention of healthcare workers.
- Request for flexibility in the use and disposal of NHS estate, seeking modifications to policies that would otherwise require retention of community facility uses on surplus NHS land, to enable reinvestment in modern healthcare services.

6.10.11 The Department for Education (DfE) submitted a detailed focused on the Plan's approach to education infrastructure, developer contributions, and planning for school place provision. Their submission can be summarised as follows:

- Recognition of the significant housing growth anticipated in the borough (1,212 dwellings per annum to 2041), and the resulting pressure this will place on education infrastructure. Emphasised the need for the Local Plan to be 'positively prepared' to meet objectively assessed development needs, including sufficient school places.
- Support for safeguarding land for new early years settings, schools, and post-16 provision, in line with national planning policy. Recommended that the Local Plan also safeguard land for future expansion of new schools where demand indicates this may be necessary.
- Welcomed the recognition in the draft Local Plan of the need for appropriate levels of social and community infrastructure, including education, to support new development.
- Recommended future versions of the Local Plan include:
 - Clear, robust, and evidence-based pupil yield factors for housing growth, broken down by early years, primary, secondary, and post-16 phases.
 - A transparent explanation of how developer contributions for education will be calculated, including pupil yields, available capacity, shortfall in places, and cost per place.
 - Confirmation that cost per pupil place is based on the DfE school place scorecards to ensure contributions are fair and defensible.
- Encouraged the identification and safeguarding of specific sites for new education provision in future plan iterations, based on the latest evidence of need and demand. Stressed the importance of clarifying delivery requirements, minimum site areas, preferred site characteristics, and safeguarding for future expansion.
- Recommended that viability assessment inform site selection and policy requirements, with an initial assumption that applicable developments will provide both land and funding for new schools. Emphasised the need for flexibility in site-specific requirements to reflect changing needs over time.
- Supported the use of Section 106 agreements to secure developer contributions for education, highlighting the advantage of ringfenced

funding for new school, early years, or sixth form places. Requested reference in the Local Plan to the possibility of securing contributions retrospectively where infrastructure is forward funded.

6.10.12 The Ministry of Defence (MOD) – Defence Infrastructure Organisation (DIO) submitted a detailed response focused on safeguarding concerns relating to the Regulation 18 Local Plan, which can be summarised as follows:

- Reference to Paragraph 102 of the National Planning Policy Framework (December 2024), which requires planning policies and decisions to take defence requirements into account by ensuring operational sites are not adversely affected by other development in the area.
- Explanation of statutory safeguarding zones, particularly those associated with RAF Northolt, which are triggered by the height of development and the potential for environments that might attract large and/or flocking bird species hazardous to aviation safety. The MOD requests that developers be informed of the statutory requirement to consult MOD when development triggers safeguarding criteria.
- Detailed description of safeguarding concerns, including:
 - Airspace safeguarding to prevent physical obstructions to safe aircraft operation, with statutory consultation required for developments exceeding trigger heights.
 - Birdstrike safeguarding zones (radius 12.87km) around military aerodromes, with consultation required for developments that may create environments attractive to hazardous bird species, such as landscaping schemes or new waterbodies (including Biodiversity Net Gain provision).
- Request for HBC to consider MOD safeguarding requirements when drafting policies related to biodiversity, ecology, and energy infrastructure, noting that some environmental improvements may not be compatible with aviation safety.
- Statement that MOD has no objection in principle to renewable energy development but highlights potential impacts of wind turbines and solar PV on defence technical installations. MOD requests consultation on all wind turbine proposals 11m or greater in height or with a rotor diameter of 2m or greater and recommends that policy makes clear that detrimental impacts on defence assets should result in refusal or conditions on consent.
- Noting of draft policy provisions for Elstree Aerodrome and Heathrow Airport Safeguarding Zones, and request for updates to reflect MOD capability and safeguarding requirements, especially for RAF Northolt.
- Provision of a summary table listing potential housing allocations and employment candidate sites affected by safeguarding zones, specifying trigger heights for statutory consultation and risks related to birdstrike.
- Conclusion that MOD expects all relevant policies and site allocations to be assessed against safeguarding criteria, and requests ongoing engagement to ensure defence capability and operations are not adversely affected by development.

6.10.13 Network Rail submitted a brief response to the consultation, focused on the Plan's approach to rail infrastructure, development impacts, and sustainable transport. Their submission can be summarised as follows:

- Recognition of the importance of safeguarding operational railway safety, especially given Hertsmere's inclusion of sections of the East Coast Main Line and Midland Main Line. Emphasised that development near these lines must not impact railway safety and should include suitable mitigations to address impacts on rail infrastructure, supporting growth and increased rail use.
- Support for the Local Plan's references to rail infrastructure in both passenger and freight contexts, particularly in relation to Borehamwood, Radlett, and Potters Bar. Welcomed the Plan's aspirations to shift car journeys to sustainable transport, noting this is positive for passenger and freight rail traffic.
- Recommendation that Transport Assessments for new development must include impacts on rail transport, enabling Network Rail to assess changes in passenger numbers, facility appropriateness, and identify any required improvements.
- Support for sustainable freight policy, highlighting the importance of rail freight in reducing road haulage. Suggested explicit reference to the Radlett Rail Freight Interchange terminal in the Local Plan, given its significance and the UK Government's commitment to 75% rail freight growth by 2050.
- Broad support for policies relating to town centre regeneration and connectivity to railway stations, welcoming further discussion with the Council as plans advance.
- Recommendation for economic policies (EC1–EC8) to reference the economic benefits of rail connections, both passenger and freight, given their strategic importance to Hertsmere's economic needs.
- Noted ongoing route studies (including with HCC) to define future rail requirements and forecast overcrowding. Stressed the importance of understanding how housing targets impact rail capacity as part of this work.

6.10.14 Hertfordshire Constabulary noted concern that police and emergency services were not identified within the Regulation 18 social and community infrastructure provisions and requested that blue-light infrastructure be expressly recognised so that the impacts of new development on emergency services can be appropriately addressed.

6.11 National and County Bodies and Organisations

6.11.1 The Woodland Trust submitted a detailed response to the Hertsmere Local Plan Regulation 18 consultation, focusing on the Plan's approach to green and blue infrastructure, biodiversity, trees, and urban greening. In summary, their submission gave the following feedback:

- Recommended that Policy GI1 (Green and Blue Infrastructure Network) should:

- Treat green infrastructure as a network of multifunctional natural assets, explicitly including woodland, trees, hedgerows, watercourses, wetland, semi-natural greenspace, and habitat corridors.
- Require high-quality, multifunctional green infrastructure designed from the outset, with clear quantitative expectations (e.g., five UK Infrastructure Standard-compliant trees per dwelling for major residential development).
- Ensure proposals contribute to coherent ecological networks and require applicants to demonstrate how their proposals connect to surrounding habitats.
- Include enforceable long-term management, funding, and monitoring arrangements for green infrastructure assets.
- Recommended that Policy GI2 (Waterways and Blue Infrastructure) should:
 - Require buffer zones alongside waterways to function as semi-natural habitat, managed for habitat value, and not used as private gardens or incidental open space.
 - Integrate riparian tree planting, wet woodland, and nature-based solutions for sustainable drainage and natural flood management.
 - Protect hydrology, soil conditions, and natural drainage patterns, especially near woodland and wet habitats.
- Recommended that Policy GI3 (Open Space, Recreation and Leisure) should:
 - Distinguish between natural greenspace and general amenity or formal recreational space.
 - Require provision or improvement of accessible natural greenspace, including woodland and semi-natural habitats, with stronger access standards (e.g., accessible woodland of at least two hectares within 500 metres of homes).
- Recommended that Policy GI4 (Biodiversity and Nature Conservation) should:
 - Expressly protect ancient woodland and ancient/veteran trees as irreplaceable habitats, requiring assessment of indirect impacts and refusing development resulting in their loss except in wholly exceptional circumstances.
 - Set a minimum 20% Biodiversity Net Gain (BNG) target and require at least 50 years of management for woodland creation and long-established habitats.
 - Ensure BNG contributes to ecological networks and prioritises on-site delivery.
- Recommended that Policy GI5 (Urban Greening and Trees) should:
 - Prioritise retention of existing trees, require early arboricultural evidence, and protect ancient/veteran/notable trees with stronger buffers.

- Commit to increasing canopy cover, adopt a size-based replacement approach for tree loss, and support use of the Ancient Tree Inventory.
- Support local canopy cover targets, the 3-30-300 principle, and use of an Urban Greening Factor for major development.
- Recommended that related sustainable design policies explicitly recognise trees and green infrastructure as essential climate adaptation infrastructure, and that cross-referencing between SD policies and GI1–GI5 would improve coherence.
- Emphasised the need for a robust monitoring framework, including indicators such as canopy cover change, BNG delivery, ancient woodland and veteran trees affected or protected, access to greenspace, and long-term management compliance. Major developments should be required to produce integrated green infrastructure and ecological management plans at the masterplanning stage.

6.11.2 **Haberdashers' Schools** submitted a detailed response focused on the draft Local Plan's approach to educational and sporting facilities, Green Belt policy, and the soundness of the plan, which can be summarised as:

- Support for the overall aims of the Regulation 18 Local Plan, particularly the prioritisation of community infrastructure and recognition of schools as essential facilities. However, the Schools recommend that the plan be amended to provide more specific and proactive support for the development, expansion, and improvement of educational facilities.
- Request for the addition of a dedicated policy or a specific subsection within the proposed community infrastructure policy (SCI2) to ensure that planning decisions give "great weight" to the need to create, expand, or alter educational facilities.
- Support for the draft policy on sports, recreation, and play spaces (SCI3), highlighting the importance of high-quality sports facilities for schools, health, and the wider community. The schools emphasise that well-designed, flexible facilities are vital for academic success and community benefit.
- Request for the extension of the Key Green Belt Site (infill envelope) designation on the Policies Map to include additional areas of the Elstree campus, excluding scheduled monuments and archaeological sites. This would support the schools' ability to maintain and enhance their educational and sporting standards, and to continue their role as a major local employer and community partner.

6.11.3 **Dame Alice Owen's School** submitted a detailed response focused on transport and infrastructure changes affecting the immediate area of the school, which can be summarised as:

- Concern regarding the proposed introduction of a cycle lane and removal of existing parking (alongside the addition of a nearby car park) outside the school and resulting potential risk to students at school drop-off.
- Concern about proposals for housing growth and whether the impact on school place has been fully and robustly assessed.

- Concern that demand for school places may increase more quickly than infrastructure is delivered, requiring existing schools to absorb growth in student numbers without corresponding expansion or investment.
- Request for further detailed traffic and safety modelling and further evidence / clarification on delivery of additional school capacity alongside housing development.
- Request to engage further with the Council to discuss and ensure that development does not pose a risk to students.

6.11.4 **CPRE Hertfordshire** submitted a comprehensive response focused on the Regulation 18 Local Plan's consultation process, housing targets, Green Belt policy, infrastructure, spatial strategy, candidate sites, and soundness, which can be summarised as:

- Strong criticism of the consultation process, stating that the period for response was inadequate and the Council's website was unnecessarily complex and difficult to use, likely discouraging public participation. CPRE also objected to the absence of draft policy wording, arguing this is not credible for a Regulation 18 consultation and may be challengeable at Examination in Public.
- Objection to the lack of reference to the record-breaking response to the previous Regulation 18 consultation in 2021, and concern that no account has been taken of local opposition, particularly regarding the significance of designated protected land such as Green Belt.
- Strong opposition to proposals for further allocation of Green Belt land for development, noting that over 1,000 hectares are proposed—more than in the 2021 version. CPRE argues the Council should fight for reduced Government housing requirements, as other councils are doing, and that Hertsmere has over-provided potential sites, which is unnecessary and damaging.
- Criticism of the justification for the new settlement at Bowmans Cross, stating the case is not made and most of the allocation is outside the plan period, raising concerns about deliverability.
- Objection to the confusion between 'need' and 'requirement' in the consultation document, arguing this undermines the technical task of applying policy constraints as required by the National Planning Policy Framework (NPPF).
- Concern over the Green Belt Assessment, which suggests most of the Borough's Green Belt could be reclassified as 'grey belt', risking the coalescence of major towns and loss of open countryside.
- Criticism of the spatial strategy, stating it ignores the role and value of open countryside, fails to emphasise a 'brownfield first' approach, and inadequately addresses infrastructure, especially water supply and waste disposal. CPRE argues that the countryside is treated as expendable and that the plan's approach to infrastructure is unspecified and unbalanced.
- Support for regeneration and reuse of previously developed sites in principal town centres, but opposition to expansion into protected green spaces. CPRE does not support the identification of Candidate Sites in

principle, arguing this increases uncertainty and fails to identify which sites are in the Green Belt.

- Support for appendices providing clarity on terminology, strategic policies, and housing supply, but reiteration that the standard method for calculating housing need is inappropriate for Hertsmere and should be replaced with an approach reflecting local conditions

6.11.5 **Savills** submitted a response on behalf of **The Crown Estate (TCE)** on the Plan's overarching approach to housing targets, as well as support for proposed development at plot HRA SA3, Land North of Watford Road and East of Kemprow, Radlett. In summary, TCE's feedback finds:

- Support that the emerging Local Plan will need to meet the borough's needs in full to be found sound at examination, setting a housing target that considers both requirements as set by the standard method and the 20% buffer set by the Housing Delivery Test. They agree with the statement that the 20% buffer will likely apply for five years of the Plan period,
- Support the use of the standard method for calculating housing need, with no exceptional circumstances that would mean it should not apply.
- Supports Radlett as a key location for growth due to its strong transport links existing services and facilities, and proximity to the SEGRO Logistics Park, which is expected to create significant employment and increase local housing demand. Development capacity should be maximised here
- Strong support for Plot HRA SA3 as a candidate site with most of the site under a single ownership, able to be delivered independently or alongside neighbouring landholdings. Support is given for a mixed-use scheme, able to support delivery of many of Radlett's strategic objectives.
- Agree that Plot HRA SA3 is "provisionally grey belt" and heritage impacts can be mitigated through careful design, enabling the site to be treated as grey belt.
- Suggests that HRA SA3 could contribute to housing delivery in the first five years of the plan period, considering the extensive technical work already completed.

6.11.6 Kerry MacDonald responded on behalf of **Hertfordshire Constabulary**, noting concern that police and emergency services are not mentioned under Footnote 29 of Chapter 8 Social and Community Infrastructure Policy SCI1. Request for blue light infrastructure to be included in order to support emergency services and mitigate impacts from new development.

6.11.7 **Bidwells LLP** submitted a response on behalf of the **Diocese of St Albans**, raising concerns about the viability of the spatial assessment, Green Belt assessments and emphasis on the need for a mix of development sizes to ensure delivery of homes in the early stages of the Plan. Their submission can be summarised into the following points:

- Support for the need for housing allocations and maintaining a five-year housing land supply.
- Support for Aldenham Glebe to be prioritised for development early in the plan period to help meet housing needs alongside larger strategic sites. It

was previously identified as draft allocation HEL345 for up to 30 dwellings but has been removed from the updated version of the Plan.

- Concern that the assessment focuses on large parcels and does not properly consider individual sites submitted through the Call for Sites process. Alternatives should be fully considered.
- Objection to the methodology and conclusions of the Green Belt Assessment. Priority should be given to previously developed land and grey belt land before releasing wider Green Belt sites, in line with NPPF paragraph 148.
- Opposition to reliance on urban Brownfield site regeneration and intensification alone to meet housing need. Recommendation made for a broader mix of site sizes and locations, including smaller Green Belt/grey belt releases capable of delivering homes in the short term and Brownfield sites across borough, including sites outside main settlements, should be considered.
- Queries the classification of Aldenham and Round Bush as separate settlements due to close proximity and shared facilities.
- Concerns are raised around the evidence base and site assessments.

6.12 Members of Parliament, Councillors or Local Party Groups

- 6.12.1 **Councillor Susman, Councillor of Shenley Ward** submitted a representation supporting the response as commissioned and sent in by Shenley Parish Council stating that the Regulation 18 Draft Local Plan cannot be supported as currently drafted. The representation can be summarised as:
- Considers the Regulation 18 consultation premature and lacking sufficient evidence, rationale, and draft policy wording to enable meaningful public engagement. The process is described as more of a “direction-of-travel” and candidate-sites exercise, with key evidence deferred until Regulation 19, which risks legal compliance and soundness issues.
 - While the Plan identifies enough housing capacity on paper, there are serious risks that homes will not be delivered at the required rate, especially as the strategy relies heavily on complex urban regeneration and brownfield sites. This exposes Shenley and other Green Belt villages to continued speculative development pressure, particularly on “grey belt” land, even if a new Local Plan is adopted.
 - The evidence base for infrastructure, viability, and delivery is incomplete or missing. Key documents such as the Transport and Movement Assessment and Car Park Study are not yet available. The absence of this evidence means the spatial strategy’s deliverability and sustainability cannot be properly assessed, especially in areas like Shenley already experiencing significant growth and infrastructure strain.
 - The Plan’s approach to “grey belt” land is seen as creating a policy vacuum that developers could exploit. The Parish Council objects to any provisional grey belt land around Shenley being treated as suitable for development until robust, updated local evidence is published and

considered. grey belt status should trigger further scrutiny, not automatic development.

- The Regulation 18 draft gives insufficient recognition to the adopted Shenley Neighbourhood Plan (2019–2036) and its Design Code. There is a call for a clear policy hook in the Regulation 19 Plan to ensure the Neighbourhood Plan and Design Code are properly integrated into the borough-wide strategy and used to guide development in Shenley.
 - The evidence base classifies Shenley as a Large Village, but this is not clearly reflected in the spatial strategy or density assumptions. There is a disconnect between the settlement hierarchy and the practical application of density and growth in Shenley. The Plan should clarify what modest development is appropriate for Large Villages and justify density assumptions with local evidence.
 - Many policy ambitions in the draft Plan are repeatedly qualified by references to viability, deliverability, or future testing, which risks weakening requirements for affordable housing, infrastructure, design quality, and climate resilience. Viability should not become a general mechanism for diluting policy standards.
 - Given the scale of recent and consented growth in Shenley (already far exceeding assessed local need), the Parish Council is advised to urgently refresh its Neighbourhood Plan evidence base and Design Code, with financial and technical support from HBC. This is needed to provide robust, locally grounded planning protection and to ensure future growth is plan-led, infrastructure-enabled, and proportionate.
 - The Infrastructure Delivery Plan is at an early stage and does not yet address how required infrastructure will be delivered or funded. There are significant concerns about cumulative impacts from already consented development, especially on transport, education, utilities, and community facilities.
- 6.12.2 In addition, Councillor Susman also expressed concern that the consultation was not accessible, had not been publicised and had not been made available in non-technical language.
- 6.12.3 The **Hertsmere Conservative Group** submitted a representation to the Local Plan that outlines support for the principle of plan-led growth but highlights fundamental and evidenced objections to the current draft on the grounds of housing quantum, spatial strategy, Green Belt policy, infrastructure planning, affordable housing provisions, and the adequacy of the evidence base provided at this consultation stage. The representation can be summarised as:
- Recognises the need for a robust, up-to-date Local Plan that is sound, legally compliant, and capable of managing growth sustainably. The Group welcomes the Plan's intention to meet Hertsmere's housing needs in full and acknowledges the importance of a plan-led approach to avoid speculative development.
 - Supports for the principle of delivering new homes, but with a clear preference for prioritising brownfield and previously developed land before considering Green Belt release. The Group calls for careful site selection,

with transparent evidence and justification for any proposed Green Belt changes.

- Emphasises protecting the Green Belt, with a recommendation that any release should be minimised and only considered where absolutely necessary and supported by robust evidence. The Group advocates for the retention of local character and open spaces.
- Highlights the critical importance of planning for infrastructure delivery alongside new development, including transport, healthcare, education, and community facilities. They recommend that infrastructure should be delivered in a timely manner and be sufficient to support planned growth.
- Requests clarity on how infrastructure and affordable housing will be funded and delivered.
- Supports design-led development and the optimisation of site capacity, with a recommendation that new development should respect local character, heritage, and environmental quality.
- Acknowledges the importance of understanding and mitigating cross-boundary impacts, particularly where growth may affect neighbouring areas. They support continued engagement with adjacent authorities to ensure coordinated planning and infrastructure delivery.
- Recognises Bowmans Cross as a potential new settlement for long-term growth. The Group supports the principle of strategic planning for future housing needs, but conditions support on the settlement being viable, self-sustaining, and supported by significant infrastructure investment.

6.12.4 **Councillor Harvey Cohen**, the elected member for **Elstree Ward**, submitted a representation requesting extension of the consultation, reduction of housing targets, removal of unsustainable Green Belt sites, higher affordable housing requirements, and full publication of infrastructure and Green Belt evidence before progressing to the next stage of plan making. The representation can be summarised as:

- Supports the principle of plan-led growth over appeal-led development but raises fundamental objections to the draft Local Plan as presented, citing concerns over housing numbers, spatial strategy, Green Belt policy, site allocations, infrastructure, and the adequacy of the consultation process.
- Strongly criticises the absence of key evidence, particularly the Infrastructure Delivery Plan and full spatial strategy, making it impossible to assess the sustainability or deliverability of proposed allocations. Requests extension of the consultation period until all evidence is published.
- Argues that the housing target is too high, not properly evidenced, and should be reduced to reflect local constraints and new demographic projections and Objects to the disproportionate allocation of growth to Borehamwood and Elstree, which already bear the majority of recent development and face severe infrastructure strain.
- Strongly opposes the current Green Belt-led strategy, noting that 91% of proposed development is on Green Belt land. Calls for independent, site-specific Green Belt assessments before Regulation 19 and for the exclusion (“red-lining”) of sites that perform strongly against Green Belt

purposes. Advocates for higher densities (40–50 dph) on any Green Belt releases to minimise land take.

- Objects to the allocation of sites HBA SA19, SA20, and SA24 (Allum Lane/Elstree Corridor), citing sustainability, highways, coalescence, biodiversity, and flood risk concerns. Opposes Well End sites (HBA SA16a, SA16b, SA16c) for similar reasons, but supports brownfield and urban site allocations, provided existing services are retained during redevelopment.
- Supports the principle of Bowmans Cross as a new settlement but calls for a much higher allocation (at least 2,500 homes within the plan period) to reduce pressure on Borehamwood and Elstree and to enable early infrastructure investment.
- Strongly objects to the proposed 30% affordable housing requirement, calling for a minimum of 50% (predominantly social rented) in line with national policy and local need. Urges the Council to be robust with developers on viability and to publish full viability evidence before Regulation 19.
- Criticises the lack of published infrastructure and transport evidence. Insists that development must be conditional on prior to delivery of key infrastructure (schools, healthcare, transport). Calls for robust climate and carbon reduction policies and for on-site infrastructure delivery as the primary mechanism.
- Challenges the grouping of Elstree Village with larger settlements, arguing that its infrastructure and services cannot support significant growth. Highlights the closure of the primary school and the importance of protecting the Conservation Area and village character.
- Requests that the Local Plan explicitly require consistency with the adopted Elstree and Borehamwood Neighbourhood Plan, especially regarding design, land use, and Green Belt policy.

6.12.5 **Councillor Paul Morris**, as elected member for **Bushey Heath** submitted a representation to the consultation. The representation can be summarised in the following points:

- Large housing allocations threaten the separation between Bushey and nearby settlements, weakening the Green Belt and harming the area's open character.
- High-density or poorly located development risks damaging Bushey's distinct suburban and village identity, including conservation areas and historic neighbourhoods.
- Existing congestion would worsen with new housing unless substantial improvements are made to public transport, walking, and cycling infrastructure—especially at Compass Park, Bushey Country Club, and Kemp Place.
- Local infrastructure is already stretched; without clear provision for additional school places, healthcare, utilities, and community facilities, development is unsustainable.

- Some parts of Bushey lack good public transport, making edge-of-settlement sites car-dependent and conflicting with sustainable planning goals.
- Development could damage open spaces, mature trees, wildlife habitats, important views, and Bushey's landscape setting, arguing against site allocation.
- Known drainage and flooding issues, especially around Little Bushey Lane, have not been properly addressed in the plan.
- Bushey is being asked to accommodate a disproportionate share of housing growth, which existing infrastructure cannot sustain.
- The plan depends on major infrastructure improvements that are currently unfunded or uncertain, making deliverability questionable.
- Residents feel alternatives and objections have not been fully considered; lack of timely information and evidence undermines confidence in the plan.

6.12.6 **Councillor Lynette Sullivan's** response to the Regulation 18 Local Plan consultation, as elected member for **Potters Bar**, strongly objects to the proposed scale and distribution of development in Potters Bar, citing concerns over housing numbers, Green Belt release, site selection methodology. The response can be summarised as:

- Urges HBC to reconsider the scale and direction of the Local Plan, highlighting the need for a more balanced and sustainable approach that protects the Green Belt, respects local communities, and delivers genuinely achievable growth. They emphasise the importance of transparent and accessible consultation, and the need for all relevant evidence to be available to residents and stakeholders throughout the process.
- Expresses strong concerns that the proposed housing numbers are neither credible nor achievable, being driven by centrally imposed methodology rather than local capacity or infrastructure constraints. The councillors question whether the scale of growth proposed for Potters Bar can be delivered without significant harm to the character of the town and the wider borough.
- Strongly opposes the large-scale release of Green Belt land, with the response arguing that exceptional circumstances have not been demonstrated. The councillor objects to the reclassification of Green Belt to "grey belt" and highlights the risks this poses to long-established protections. Specific objections are raised to sites such as Warrengate Farm, the golf course, and other large-scale Green Belt allocations, citing harm to openness, landscape character, and infrastructure.
- Criticises the Local Plan for insufficiently prioritising brownfield development and lacking joined-up strategic thinking regarding town centre regeneration, higher density development in sustainable locations, and opportunities around transport hubs. It is recommended that Green Belt release should only be considered after all brownfield opportunities have been exhausted.

- Raises concerns about the adequacy of infrastructure planning, including healthcare, school places, public transport, road capacity, and utilities. They highlight deficiencies in flood risk evidence and the Sequential Test, and question whether proposed flood mitigation measures are deliverable or effective. The response stresses that development must not outpace infrastructure delivery.
- Considers the proposals to risk fundamentally changing the character of Potters Bar and neighbouring communities, leading to increased congestion, pressure on services, loss of green space, and reduced quality of life. The response calls for the Local Plan to reflect the wishes of existing communities and protect the distinct identity of towns and villages.
- Argues that the consultation process has not been adequate, with documents being difficult to access and interpret, insufficient communication with non-digital residents, and an overly technical and intimidating response process. Concerns are also raised about missing key documents and incomplete evidence, questioning the procedural soundness of the consultation.

6.12.7 **Councillor Lucy Selby's** response to the Regulation 18 Local Plan consultation, as elected member for **Radlett**, supports the principle of positive planning for growth but strongly objects to the scale and distribution of development proposed for Radlett and highlights concerns regarding Green Belt release, infrastructure capacity, site selection methodology, and the risk to Radlett's character and identity. The representation can be summarised as:

- Acknowledges the need for new housing and supports positive planning for growth but urges HBC to revisit the spatial strategy for Radlett to ensure growth is proportionate, infrastructure-led, and consistent with the settlement's character and constraints.
- Objects to the scale and form of proposed growth at Radlett, highlighting that nearly all new homes would be on Green Belt land and that the proposed concentration of approximately 2,900 dwellings is disproportionate to Radlett's role and function.
- Questions why Radlett is allocated a much higher percentage increase than other settlements and why alternative sites, such as HELAA 214, have not been considered.
- Emphasises that infrastructure-first planning has not been demonstrated and notes the absence of a secondary school, limited employment opportunities, and existing congestion and transport constraints. It calls for clear evidence of deliverable supporting infrastructure—such as school capacity, healthcare, funded highway mitigation, and enhanced public transport—before any significant growth is planned.
- Strongly opposes large-scale Green Belt release, arguing that exceptional circumstances have not been demonstrated and that all reasonable alternatives have not been fully examined. It calls for minimising Green Belt loss, prioritising lower-harm and brownfield sites, and ensuring defensible development boundaries.

- Raises concerns that the proposed pattern of growth risks coalescence with neighbouring settlements (Bushey, Watford, Borehamwood, Shenley), erosion of Radlett's distinct village identity, and irreversible loss of Green Belt and open countryside.
- Recommends that if growth is required, it should be reduced and rebalanced towards previously developed land, small urban sites, smaller contained edge-of-settlement sites, and phased delivery linked to confirmed infrastructure, while avoiding strategic sprawl.
- Supports some central brownfield and urban sites (e.g., Regency House, Railway Cottages) but objects to major Green Belt allocations (e.g., Home Farm, Land North of Watford Road and West of New Road) due to scale, impact on agricultural land, landscape harm, and infrastructure concerns. Some sites (e.g., Starveacres) are supported only if density is reduced.
- Questions the adequacy of the evidence base, the rationale for site selection, and the lack of clarity regarding infrastructure delivery. It requests that the Council revise the Radlett strategy to provide a lower, infrastructure-led, and proportionate level of growth.

6.12.8 Marrons submitted a response on behalf of the Mayor and Burgesses of the London borough of Enfield.

- Support is given to site HPBA SA12 due to efficient land use and contribution to housing delivery targets. This development will incorporate high density residential development, and it is recommended to aim for a figure of 350 - 400 homes. The site is in alignment with the Council's growth strategy and therefore is suitable for housing delivery.
- Support that development of HPBA SA12 will secure new and improved transport infrastructure, including walking and cycling routes. Development near railway stations is encouraged.
- Recommendation is made to bring forward the site east of Southgate Road in years 1-5 of the Local Plan, as it is available, suitable for development as grey belt land, and there are no notable constraints.
- Requests are made for high-quality homes that help meet local needs, including family and affordable housing ranging from 1-4 bed dwellings.

6.13 Developers, Agents and Landowners

Borehamwood Candidate Sites

6.13.1 **HCC** in their capacity as landowner submitted a representation supporting the consideration of **HBA SA4 Elstree Way Clinic, Cheeky Monkeys Nursery and former library** as a residential candidate site. The representation can be summarised as:

- Welcomes the inclusion of the former library and the building currently occupied by the nursery and highlights the clinic, between these two buildings, is owned by the NHS.
- Both HCC buildings are currently occupied with temporary uses, which will need to be relocated somewhere within the Elstree Way Corridor or elsewhere in Borehamwood when the site is redeveloped.

- HCC has participated in recent master planning work for the Elstree Way Corridor and supports the delivery of development in line with the masterplan.
- 6.13.2 **HCC** in their capacity as landowner submitted a representation supporting the consideration of **HBA SA9 Borehamwood Fire Station** as a residential candidate site. The representation can be summarised as:
- Supports the inclusion of HBA SA9 as a ‘residential candidate site’.
 - Highlights that for HBA SA9 to be redeveloped the Fire Station would need to be provided on the ground floor of any scheme for the site or within the local area. The county council would work with HBC to identify an alternative site for the Fire Station.
 - A site of 0.44 hectares would be required for the provided Fire Station. Other considerations include a location close to the strategic road network in order to aid response times of emergency vehicles.
 - Hertfordshire Fire and Rescue Service attendance standards for types of incidents are used to help determine the best location for a Fire Station. For example, for primary fires the attendance standard is set at 10 minutes (on 90% of occasions) for the first fire appliance attending. Further information is set out in HCC’s [Service Provision and Place-Making Guide 2024](#).
 - Tempsford Green, which is in the ownership of HBC, has previously been considered as a possible site for the Fire Station.
- 6.13.3 **Network Rail** in their capacity as landowner for **HBA SA7 Elstree and Borehamwood Railway Station** submitted a representation that expressed support for development around and connectivity to the railway station and would welcome the opportunity to discuss matters with the Council in more detail as the plan moves forward.
- 6.13.4 **Savills**, on behalf of **Glenbrook**, submitted a representation to the Hertsmere Local Plan promoting the maximisation of the development potential of **HBA SA15 Imperial Palace, Elstree Way** and expressed support for the Hertsmere draft Local Plan, especially its focus on brownfield regeneration and sound, plan-led growth. In promoting HBA SA15 Imperial Palace, Savills advocated for a higher housing quantum, policy flexibility and the removal of conflicting employment designations. The representation can be summarised as:
- Broadly support for the Draft Local Plan’s positive vision for growth and meeting local needs, including the use of the standard method for calculating housing requirements and the need for an up-to-date, plan-led framework that is sound and legally compliant.
 - Strongly support for prioritising sustainable, brownfield sites (such as Imperial Place) for significant housing growth, rather than releasing Green Belt land. Imperial Place is underutilised and well-suited for a mixed-use redevelopment, aligning with national and local policy to optimise urban land.
 - Outline that the emerging proposals include demolition of three buildings, erection of new buildings up to 14 storeys, delivering around 555 new

homes (significantly above the draft allocation of 221), with a mix of tenures and ground floor retail.

- Request for the site's allocation to reflect the higher capacity and for its removal from the Employment Land Hierarchy to avoid policy conflict. Support for the site as a suitable location for tall buildings and for early delivery within the first five years of the plan period.
- Express support for a pragmatic approach to affordable housing, with requirements tested against site-specific viability. Request for policy flexibility to allow off-site provision or financial contributions if on-site delivery is not viable, particularly given the abnormal costs of brownfield regeneration.
- Are supportive for mixed-use development and ground-floor employment uses, but request clarity on affordable workspace policy and removal of Imperial Place from the Employment Land Hierarchy to align with its residential-led redevelopment.
- Support high-quality, design-led development, inclusive and accessible environments, and alignment with national net zero and sustainability standards. Request for flexibility in policy wording to ensure viability and site-specific responses, including for play space, parking, and building heights.
- Are supportive of policies promoting sustainable transport, Healthy Streets, and integration with public transport. Request for flexibility in parking standards to reflect site-specific circumstances.
- Broadly agree with the Plan's settlement hierarchy, spatial strategy, and approach to Green Belt, with emphasis on maximising urban regeneration opportunities in Borehamwood and Potters Bar.

6.13.5 **Garry Reynolds** submitted a representation to the Hertsmere Local Plan, on behalf of **Meenal Sachdev**, promoting part of **HBA SA18 Land north of Barnet Lane, Borehamwood**. The presentation can be summarised as:

- Views the site as suitable, available and achievable for residential development and represent an excellent opportunity for housing allocation within the emerging plan.
- Believes the sites constitute grey belt land. They sit within the existing Green Belt designation but make a limited contribution to the five Green Belt purposes as defined in the National Planning Policy Framework (NPPF). In line with the Government's December 2024 revisions to the NPPF and the associated grey belt policy framework, such land should be prioritised for release to meet identified housing need, subject to the application of the 'golden rules'.
- Outlines that the sites are capable of delivering approximately 24 new homes (5 on Site A and 19 on Site B), including an appropriate proportion of affordable housing, alongside contributions to infrastructure and public open space.

6.13.6 **HGH Planning** submitted a representation on behalf of **ACRE Bushey Ltd**, on **HBA SA19 Land South of Allum Lane, Elstree**. In summary, the representation found that:

- Agrees the site is in a suitable and available location with access possible from Allum Lane, and a sustainable location considering active travel and public transport access and local services. Support is given for allocation in the Local Plan to help meet housing need.
- Notes the site is largely unconstrained, other than being a Green Belt designated site and some encroachment of surface water flow paths to the east of the site, where housing should not be located. Archaeological and conservation area designations should not be considered constraints to development.
- Recommends using the 2026 Green Belt Assessment when considering allocations and supports identification of the site as grey belt.
- Elstree Recycling Centre, off Allum Lane, is identified in the LACW Spatial Strategy as being too small to meet future demands. The Plan should consider how additional service capacity can be achieved for this area. Consideration should be given towards a suitable buffer zone between the recycling facility and the HBA SA19 site due to operational noise.

6.13.7 **Vail Williams** submitted a representation on behalf of **Radlett Park Land LLP** to the Hertsmere Local Plan promoting **HBA SA20 The Hertsmere Golf Course** supporting the principle of a sound, plan-led approach to growth in Hertsmere, with particular emphasis on the need for flexibility in Green Belt assessment and site allocation. The representation can be summarised as:

- Supporting the need for an up-to-date, sound, and legally compliant Local Plan, based on the standard method for housing need and a 20% buffer on the five-year housing land supply. It recognises the importance of a positive vision for the Borough, robust evidence, and coordinated growth.
- Requests further clarification on the approach to site selection and outstanding evidence base items, with a recommendation for more explicit Green Belt policy content.
- Agrees with the Council's approach to the Duty to Co-operate and the settlement hierarchy, supporting ongoing engagement to ensure strategic and cross-boundary issues are addressed, and infrastructure needs are met.
- Does not fully agree with the Council's Green Belt assessment, arguing that some parcels are too broad and that more 'grey belt' land could be identified. The response proposes a smaller parcel at the southern end of HBA SA20 for residential development (250–350 homes), while retaining the golf course to the north. It argues that this southern parcel, when considered in isolation, makes a weaker contribution to Green Belt purposes and should be considered for allocation.
- Proposes a masterplan that retains a thriving golf and leisure facility (with an extension to the north into agricultural land) and delivers a surplus parcel to the south for 250–350 homes. The site is described as suitable, available, and deliverable within the plan period, with good accessibility and potential for a holistic approach to development alongside adjacent sites. The proposal seeks to align with the settlement pattern and maintain significant open space and recreational use.

- Supports focusing growth around existing settlements with access to services and public transport, and agrees with the Council's approach to infrastructure capacity. No alternative spatial strategy is proposed, but a lower dwelling number for SA20 is suggested compared to the draft plan.
- Supports the Council's approach to green and blue infrastructure, particularly the flexible use of golf courses for multiple purposes (housing, recreation, biodiversity). It highlights The Hertsmere as an example of co-locating complementary uses for community benefit.
- Recommends that the Local Plan should consider a more flexible and nuanced approach to Green Belt release and site allocation, specifically supporting the allocation of the southern parcel of HBA SA20 for residential development while retaining the golf course. The response welcomes ongoing engagement and offers to provide further technical evidence as the plan evolves.

6.13.8 **Lichfield's** submitted a representation to the Hertsmere Local Plan on behalf of **City & Docklands Management Ltd** and **Old Haberdasher's Sports Ground Ltd** promoting **HBA SA22 Old Haberdasher's Sports Ground** supporting the allocation of the site for a higher-density residential development, with replacement sports facilities provided at Land West of Watling Street. The representation can be summarised as:

- Supports the principle of a plan-led approach to sustainable growth and the need for robust evidence to underpin site allocations.
- Highlight the importance of optimising housing delivery in sustainable locations and ensuring the Local Plan is sound and legally compliant, in line with the National Planning Policy Framework (NPPF).
- Supports a housing strategy that meets need in full and advises that the site can deliver homes in the first 5 years, helping address housing supply shortfalls and reduce reliance on larger strategic allocations.
- Supports the inclusion of HBA SA22 as a candidate site for residential development, noting its sustainable location within the Borehamwood settlement boundary and its lack of significant constraints and requests that the indicative capacity be increased to 200 homes (from 95), to optimise density in line with NPPF guidance.
- Proposes that replacement sports pitches and facilities for Old Haberdashers be provided at Land West of Watling Street, Aldenham, as a direct donor site to enable residential development at Croxdale Road. The Watling Street site is described as suitable for sport and leisure use, with a masterplan for three/four pitches and a new clubhouse and is considered appropriate development in the Green Belt. The proposal is designed to minimise landscape and heritage impacts, and to deliver biodiversity net gain.
- Objects to continued protection of the sports pitches under Policy SADM34 as they are privately owned and not publicly accessible.
- Considers both sites to be available and deliverable within the first five years of the plan period and highlights the importance of coordinated delivery, with planning applications for both sites to be submitted in

tandem. It also notes that the relocation of sports facilities will provide improved provision for the community and strengthen links with Haberdashers' Aske's School.

- Recommends that HBA SA22 be allocated for up to 200 homes, with the delivery of replacement sports facilities at Watling Street secured as part of the allocation.
- Welcomes further engagement with the Council to ensure the Local Plan is robust, deliverable, and meets the Borough's housing and infrastructure needs.

6.13.9 **HGH Planning** submitted a representation to the Hertsmere Local Plan on behalf of **The South Medburn Trust, Jennifer Nissen & Caroline Taylor** and also separately on behalf of **Haberdashers' School**, promoting **HBA SA24 Land North of Allum Lane and East of Watling Street**. The representation can be summarised as:

- Supports Hertsmere's plan-led approach to meeting housing needs in full, consistent with the NPPF. It agrees that exceptional circumstances exist to review Green Belt land and advocates for the release of land performing poorly against Green Belt purposes ("grey belt") in sustainable locations.
- Supports the identification of HBA SA24 as a candidate site for housing development, highlighting its "grey belt" credentials and suitability for release. The site is in single ownership, available, and deliverable, with an outline planning application submitted for 136 homes (proposed to increase to 150). The site is considered capable of accommodating up to 198 dwellings, subject to site-specific constraints.
- Argues that development would not fundamentally undermine Green Belt purposes and is not inappropriate under NPPF Paragraph 155.
- Considers that the site's location aligns with the draft Plan's spatial strategy, focusing growth in Borehamwood, the Borough's principal settlement and supports comprehensive planning and design-led development, as required by the emerging Local Plan.
- Recommends the allocation of Land North of Allum Lane (HBA SA24) for residential development, confirming its suitability, availability, and deliverability.
- Objects to Green Belt Assessment methodology, particularly how land around Radlett has been assessed and concerns that cumulative impacts have not been properly considered.
- Supports the settlement hierarchy and the exclusion of smaller Category VI and VII settlements from significant development due to poor sustainability and reliance on private cars.
- Recommends that HRA SA4 (Land South of Watford Road and West of New Road, Radlett) should be removed from the Plan as it would result in loss of agricultural land, Green Belt harm, heritage impacts and increased settlement coalescence.
- Concerns that HRA SA4 is not a sustainable location due to distance from services and Radlett Station, leading to car dependency and pressure on local infrastructure.

- Welcomes ongoing engagement with HBC and stakeholders to refine policy and demonstrate the site's contribution to meeting housing and affordable housing needs.

6.13.10 **Warner Planning** submitted a representation to the Hertsmere Local Plan on behalf of **Griggs (Options) Ltd** ("The Developer") and **Highmoon Developments Ltd** ("the Landowner") promoting **HBA SA26 Organ Hall Farm, Theobald Street** for allocation in the Local Plan. The representation can be summarised as:

- Welcomes continued dialogue to refine proposals and ensure Organ Hall Farm contributes positively to the Plan's objectives.
- Strongly support the Council's plan-led approach to meeting housing needs in full, recognising the acute housing requirement in the Borough and the need for a robust, deliverable spatial strategy.
- Welcomes and supports the inclusion of Organ Hall Farm as a candidate allocation (HBA SA26), confirming its deliverability and developability, evidenced by outline planning permission (22/2149/OUT) and a current reserved matters application.
- Requests that the site's allocation be amended to reflect an increased capacity of up to 160 dwellings (from 110), in line with the emerging masterplan and policy objectives to optimise site delivery.
- Supports the release of Organ Hall Farm from the Green Belt, citing the Council's previous finding of "Very Special Circumstances" at the outline permission stage, including acute housing need, provision of affordable housing, a new medical centre, biodiversity improvements, public open space, and economic benefits.
- Argues that the site is "grey belt" and its release is justified, proportionate, and consistent with national policy.
- Requests that Organ Hall Farm be included as a deliverable site in Years 1–5 of the housing trajectory, reflecting its advanced planning status and ability to strengthen the five-year housing land supply at adoption.
- Emphasises that every additional home from a consented and deliverable site reduces pressure on less certain allocations.
- Supports Policy HBA1 and the spatial strategy focusing growth at Borehamwood, the Borough's most sustainable settlement.
- Confirms no unresolved technical or environmental constraints, with all issues addressed through the planning process.
- Highlights the site's accessibility, sustainable location, and capacity for public open space, biodiversity enhancements, and sustainable transport infrastructure.

6.13.11 **Woolf Bond Planning** submitted a response on behalf of **Grigg (Options) Ltd** and **Wrotham Park Settled Estates** promoting the allocation of **HBA SA16 Well End Strategic Urban Extension** that supports the Hertsmere Local Plan's approach to sustainable growth and robust plan-making, with recommendations in relation to housing targets, site allocations and planning policy. The representation can be summarised as follows:

- Recommended that the housing requirement be set at a consistent 975 dwellings per annum throughout the plan period (2025–2044), ensuring alignment with national policy and providing for sufficient housing to meet both local and any unmet needs from neighbouring authorities.
- Recognises the importance of retaining the allocation of the Well End Urban Extension (HBA SA16), with policy wording that allows for individual applications to come forward on separate land parcels, subject to appropriate permeability and comprehensive masterplanning.
- Supports the inclusion of land east of Cowley Hill and land north of Rowley Lane, Borehamwood, as housing allocations within the Well End Strategic Urban Extension, noting their suitability, deliverability, and capacity to provide much-needed homes and supporting infrastructure.
- Endorses Hertsmere's evidence-led approach, including technical studies on flood risk, landscape, transport, and ecology, and confirmation that ongoing technical work and dialogue with prescribed consultation bodies will ensure deliverability and address any constraints.
- Welcomes the opportunity to work collaboratively with the Council to refine policy wording and masterplan proposals, aiming for a robust Local Plan that delivers sustainable growth and a high-quality, well-connected community.
- Recognises that the proposed sites can contribute to accelerated housing delivery in the early years of the plan period, with confidence in their suitability, availability, and achievability.
- Supports the transformation of privately owned land into publicly accessible green space, promoting healthy and active lifestyles, and the creation of strategic landscape buffers to enhance the settlement edge and wider Green Belt.
- Committed to continued collaborative working and technical assessment to ensure the Local Plan is sound, legally compliant, and capable of managing growth sustainably.

6.13.12 **Borehamwood Homes Ltd** submitted a response giving feedback on candidate site HBA **SA13 McDonalds, Shenley Road**, and general feedback on Policy H7. Their submission can be summarised into the following points:

- Recommendation that the site at Nat West House, 225 Shenley Road, Borehamwood which borders SA13 is also allocated as a site.
- Support for Policy H7 to include a policy dealing with 'Housing with Shared Facilities / Homes in Multiple Occupation', though it needs to distinguish between large scale 'Purpose Built Communal Living' schemes and smaller Houses of Multiple Occupation. These two types of communal living can meet different housing needs.
- Co-living schemes can make a valuable contribution towards housing targets and should be encouraged throughout Hertsmere in suitable locations and criteria.

Bushey Candidate Sites

6.13.13 **Twenty5 Planning** submitted a response on behalf of **Redrow Homes Ltd**, promoting the allocation of **HBUSA SA4 Land at Little Bushey Lane**

(east), for residential development. The representation can be summarised as follows:

- Supports the allocation of HBUSA SA4 for up to 280 dwellings (overall capacity could be higher taking account of the additional parcel of land to the north), including 50% affordable housing, a community/mobility hub, public open space, and associated infrastructure, in accordance with national and local policy requirements.
- Recognises the site's location within the Green Belt and notes that the site meets the definition of 'grey belt' as set out in the Planning Practice Guidance and is compliant with paragraph 155 of the NPPF and the 'Golden Rules'. The development is not considered inappropriate in the Green Belt, and any harm is outweighed by the scheme's benefits.
- Endorses the Council's evidence-led approach, including independent scrutiny of flood risk and drainage documentation, confirming compliance with national and local policies following amendments and extensive consultation.
- Highlights the acute local need for both market and affordable homes, with the scheme delivering up to 140 affordable units, exceeding policy requirements and addressing significant under-delivery in the borough.
- Supports the provision of substantial public open space, upgrades to Public Rights of Way, and a community hub, enhancing accessibility, sustainability, and community cohesion.
- Acknowledges landscape harm arising from the change in character but considers mitigation and retention of green infrastructure as positive improvements over previous schemes.
- Welcomes ongoing technical work and dialogue with prescribed consultation bodies, including Highways, Ecology, and Environmental Health, to ensure deliverability and address constraints.
- Confirms that the adverse impacts do not significantly and demonstrably outweigh the benefits, and that the 'tilted balance' applies, supporting the grant of planning permission.
- Supports the proposed strategic transport policies.
- Requests clarity on potential policy related to the Elstree Aerodrome and implications for residential developments within the Bushey area.
- Encourages the Council to engage with relevant landowners and developers of proposed site allocations on detailed policy wording and site requirements ahead of Regulation 19 publication stage.
- Recommends a review of policy to ensure that is in line with national policy / does not duplicate national policy requirements, including in relation to energy and water efficiency standards and flood risk assessment.

6.13.14 **Montagu Evans** submitted a response on behalf of **Latimer Development Limited, Hill Residential Limited** and **MCF Trading Limited**, promoting the allocation of **HBUSA SA5 Land rear of Farm Way (north)** for a large-scale, mixed-use urban extension. The representation can be summarised as follows:

- Supports the allocation of HBUSA SA5 for up to 802 dwellings (including affordable and self/custom build homes), a 70-bed care home, land for a two-form entry primary school, flexible non-residential uses, and extensive public parkland, in line with national and local policy requirements.
- Highlights the site's 'grey belt' status and argues that its release would not fundamentally undermine Green Belt purposes, referencing both Council and independent Green Belt assessments.
- Notes that the site is subject to a live hybrid planning application (ref. 25/0972/FULEI), which demonstrates deliverability and includes detailed technical assessments.
- Requests that the allocation boundary be amended to align with the planning application, ensuring the Community Park is included and protected in perpetuity, and that a defensible Green Belt boundary is established.
- Supports the Council's evidence-led approach but recommends refinements to the evidence base (including the Green Belt Assessment) to reflect the site's weak contribution to Green Belt purposes and to address inconsistencies in the assessment of Bushey as a single settlement.
- Welcomes the identification of HBUSA SA5 as a sustainable urban extension, noting its proximity to services, single ownership, and capacity to deliver 200 homes in the first five years, contributing immediately to the borough's five-year housing land supply.
- Endorses the inclusion of land for a primary school, extensive public open space, and community infrastructure, which will benefit both new and existing residents.
- Stresses the importance of Green Belt release (specifically grey belt) to meet objectively assessed housing needs, given the limited brownfield land in Bushey and the borough.

6.13.15 **Quod** submitted a response on behalf of **Trulocom**, supporting the identification of **HBUSA SA6 Land at Elstree Road (south)** as a candidate allocation for a major, age-friendly, intergenerational community. The representation can be summarised as follows:

- Strongly supports the allocation of the site for a comprehensive, mixed-use development including approximately 1,085 homes (including 468 affordable homes and specialist older persons accommodation), a 130-bed care home, a purpose-built Neighbourhood Health and Diagnostics Centre, and a range of community, leisure, and open space uses, in line with national and local policy objectives.
- Notes the site's status as 'grey belt' (previously developed land with no strong Green Belt function), referencing both Council and independent Green Belt assessments, and argues that its release is consistent with national policy prioritising brownfield and grey belt land for development.
- References the live outline planning application (Ref: 24/0692/OUTEI) for an exemplar intergenerational community, which is progressing positively through the planning system, with amendments forthcoming to increase affordable housing and respond to consultee feedback.

- Supports the Council's intention to meet full housing needs (with a 20% buffer), and argues that sites like HBUSA SA6, which are technically tested and deliverable in the short term, should be prioritised over less advanced or more constrained sites.
- Requests that the site's HELAA assessment be updated to reflect its grey belt status and deliverability, and that the site is formally allocated in the Regulation 19 Plan to ensure a robust and flexible housing land supply.
- Emphasises the innovative, holistic approach to integrating housing, health, and community infrastructure, with the Neighbourhood Health Centre aligning with the Government's Neighbourhood Health Framework and addressing local healthcare needs.
- Recommends that the Local Plan includes clear policy support for the delivery of health infrastructure, and specifically allocates HBUSA SA6 for this purpose, to ensure alignment between housing growth and community facilities.

6.13.16 **HGH** submitted a response on behalf of **Griggs Homes and Hill Residential** supporting the draft allocation of **HBUSA SA7 Bushey Golf and Country Club** as a candidate site for up to 250 residential dwellings and non-residential floorspace, as an urban extension to Bushey. The representation can be summarised as follows:

- Strongly supports the site's inclusion as a candidate allocation, highlighting its suitability, availability, and achievability for development within 5–10 years, and its potential to protect higher-performing Green Belt sites elsewhere in the Borough.
- Confirms the site is in single ownership, available now, and free from legal, ownership, or financial impediments. No technical or environmental constraints have been identified that would prevent development.
- Proposes a masterplan with up to 250 homes, a food store, community centre, boxing club, MPAA Academy, local nursery, and extensive publicly accessible open parkland, with built development focused to the north-east, fronting High Street.
- Endorses the Council's approach to meeting housing needs in full, in line with national policy, and argues that Bushey (a Tier II settlement) is well-placed for sustainable growth, with strong public transport links and local amenities.
- Notes the site's "grey belt" status (as assessed by AECOM), supporting its prioritisation for development over higher-performing Green Belt sites, and requests the Green Belt assessment be updated to reflect this.
- Disputes the Council's heritage assessment, arguing that any harm to heritage assets would be "less than substantial" and can be mitigated, with further independent heritage evidence to be submitted.
- Commits to delivering 50% affordable housing, a new country park, and enhanced community and ecological infrastructure, in line with the NPPF's "Golden Rules" for sustainable development.

- Emphasises the site's sustainable location, strong connectivity, and the benefits of integrating new and existing communities through high-quality public realm and active travel links.

6.13.17 **HGH** submitted a response on behalf of **Veladail Leisure Ltd and Griggs (Options) Ltd** endorsing the draft allocation of **HBUSA SA8 Bushey Hall Golf Course** as a candidate site for residential development. The representation can be summarised as follows:

- Supports the site's inclusion and advocates increasing the allocation from 350 to 550 dwellings, utilising the full site ownership boundary (42 hectares), to optimise land use and protect higher-performing Green Belt sites elsewhere in the Borough.
- Confirms the site is in single ownership, available now, and free from legal, ownership, or financial impediments. Planning permission (ref: 24/1022/OUT) has been granted for 350 homes and community, healthcare, and well-being facilities, with detailed approval for residential layout and access.
- Technical evidence (transport, green belt, flood risk, ecology, trees, heritage, contamination) demonstrates the site is suitable, available, and achievable for development. No technical or environmental constraints have been identified that would prevent delivery of up to 550 homes.
- The site is classified as "grey belt" in the AECOM Green Belt Assessment and NPPF (2024), supporting its prioritisation for development over higher-performing Green Belt sites. The representation requests the allocation be updated to reflect this.
- The site is sustainably located, with strong connectivity to Bushey and Watford, public transport links, and access to local amenities. The approved access strategy (Bushey Mill Lane and Bushey Hall Drive) is robust and can accommodate additional growth.
- The development will retain and enhance significant blocks of woodland, mature trees, and landscaped areas, providing extensive publicly accessible open space for new and existing communities.
- The site will deliver a mix of market and affordable housing, supporting Hertsmere's acute housing need (current supply at 0.98 years, sixth worst in England).
- Requests HBUSA SA8 be confirmed as a full housing-led allocation for 550 dwellings in the Regulation 19 Local Plan, to help address the Borough's housing shortfall and ensure a robust, deliverable supply of homes and community facilities.

6.13.18 **DLP Planning Ltd** submitted a response on behalf of **Senior Living (Elstree) Ltd**, on **HBA SA18 Land North of Barnet Lane, Borehamwood**. The response shares support for a more flexible Local Plan that enables sustainable development, particularly to deliver specialist older persons accommodation. Their submission can be summarised into the following points:

- Support for site HBA SA18 to be allocated for development, and suitable for specialist older persons housing. There is a significant unmet need for extra care housing.

- Disagrees with the current settlement hierarchy and classification of Elstree, considering it inconsistent with the evidence on accessibility and services.
- Opposition to the spatial strategy, which concentrates growth in Borehamwood and Potters Bar and limits development in settlements such as Elstree. The respondent supports a more flexible, criteria-based approach.
- Suggestion that Policy H1 should better recognise the Borough's housing shortfall, particularly the need for specialist older persons accommodation.
- Support for Policy H5 in principle, but consider it too restrictive as it focuses provision in Borehamwood and Potters Bar. Requests are made for Borough-wide opportunities and specific delivery targets.
- Support for designating Parcel EL-003 as Grey belt land to accommodate development, voicing support for grey belt sites helping meet housing needs.
- Support for the proposed 20% housing buffer.

6.13.19 **DPP Planning Ltd** submitted a response on behalf of **Aldenham Estates**, covering concerns of reliance on large sites and insufficient flexibility to meet housing needs across the Borough. The submission can be summarised into the following points:

- Objection to the overall Spatial Strategy, particularly the concentration of growth in the four main settlements and a proposed new settlement. The respondent's view is that a wider distribution of development should be considered across smaller settlements. Smaller sites can be delivered at pace compared to strategic allocations.
- Concern that large villages and villages, particularly Elstree, have been excluded from meaningful growth opportunities despite evidence showing they have reasonable accessibility and local services. Also support for allocating more sites overall to create a contingency buffer and improve housing delivery performance.
- Strong objection to the application of the settlement hierarchy for Elstree which should be a Category IV Large Village.
- Support for releasing appropriate Green Belt/grey belt land to provide a broader and more resilient housing supply. Draft Policy H10 should prioritise grey belt land in the manner set out by NPPF paragraph 148.
- Concern that several allocated sites across Borehamwood and Potters Bar (HPBA SA1, SA3, SA8, SA13) may not be realistically deliverable because they contain existing operational uses.
- Support for allocating an omitted site at Land east of Aldenham Road, north of the A411, Elstree, capable of delivering around 60 dwellings. The site is referenced in relation to HEL602 (Aldenham Estate).
- Land east of Aldenham Road, north of the A411, Elstree site is available, suitable, adjacent to existing development and should be included in the Plan.

- Highlights potential impacts on the setting of Aldenham Park (Grade II Registered Park and Garden) requiring heritage assessment and mitigation.
- Requests for a more positive delivery-focused approach and greater clarity on how housing targets will be achieved.
- Concern that the Council's evidence base does not justify the proposed growth strategy, housing requirement, housing trajectory, or assumptions about site delivery.

6.13.20 **Garden Rock Holdings Ltd** submitted a response relating to the Borehamwood area, in particular burial space provision. The submission can be summarised into the following points:

- Concern that existing cemeteries are full or nearing maximum capacity, with on provision made for future cemetery requirements in the Plan. The boroughs have statutory duties to provide and maintain adequate space.
- Request is made for inclusion of space for a cemetery at the former A1 Shooting Grounds site near Borehamwood, east of the Barnet By-Pass. Permission has twice previously been granted, and a new cemetery application is expected.
- Advises that though the area covering the former A1 Shooting Grounds site is proposed to be within designated Green Belt, the site contains buildings, roads and numerous large earth bunds to contain lead pellets.

Potters Bar Candidate Sites

6.13.21 **Baker Parry** submitted a response on behalf of **Chase New Homes** supporting the draft allocation of **the HPBA SA2 Canada Life Site** for residential-led mixed-use redevelopment. The representation can be summarised as follows:

- Supports the allocation of the Canada Life Site as a 'candidate site' for comprehensive mixed-use redevelopment, comprising main-town employment centre uses at ground and lower levels and residential above, with vertical intensification.
- The site (1.81 ha) is in Potters Bar Town Centre, currently comprising office, commercial, and residential uses, and is considered highly sustainable for urban regeneration and housing delivery.
- Chase New Homes has an interest in the land, and the site is available, suitable, and achievable for residential development within five years, meeting the NPPF definition of 'deliverable'.
- Pre-application discussions with the LPA and stakeholders have been ongoing since June 2025, including Design Review Panel presentations and public consultation.
- Supports the Local Plan's spatial strategy, particularly the focus on urban regeneration of brownfield sites in Potters Bar and agrees that this approach is sustainable and aligned with national policy.
- Endorses the indicative capacity of 369 dwellings and the ambition for the site to contribute to town centre regeneration, with flexibility for a mix of compatible commercial and residential uses.

- Requests that the site allocation wording allows flexibility for retention or conversion of existing buildings (such as Maple House and Canada Life Place) where this supports policy objectives (e.g., embodied carbon) and does not prejudice wider site delivery.
- Supports a design-led approach to building heights and density, with the site identified as suitable for tall buildings and higher densities (200–250 dph), in line with the NPPF and the Council’s HELAA.
- Notes that the site cannot accommodate all open space requirements on-site due to its size and location, and supports off-site contributions where appropriate, given proximity to existing parks and play spaces.
- Recommends that infrastructure improvements (e.g., walking and cycling routes) should be delivered comprehensively by the Council or via CIL funding, rather than piecemeal by individual sites.
- Supports the Council’s intention to meet Local Housing Need in full, with a supply ‘headroom’ above the requirement to address past under-delivery and affordable housing needs.
- Requests clarity and viability testing for affordable housing, CIL, and s106 contributions to ensure deliverability.

6.13.22 **CDS Planning** submitted a response **confirming HPBA SA4 Potters Bar Railway Station Car Park, Darkes Lane** availability and deliverability for development. The representation can be summarised as follows:

- Confirms that the Potters Bar Railway Station Car Park site is available and deliverable for development, supporting its allocation in the Local Plan.
- Notes that, following recent discussions with Network Rail, the site cannot accommodate a building taller than four storeys.
- Development of the site was allowed at appeal after a lengthy planning process, demonstrating its suitability and achievability.
- The applicant and landowner intend to submit revised plans for a smaller building, delivering approximately 26 apartments plus commercial space.

6.13.23 **Marrons** submitted a response on behalf of **the Mayor and Burgesses of the London Borough of Enfield** supporting the allocation of the **HPBA SA12 Land rear of Park Avenue** for residential development. The representation can be summarised as follows:

- Supports the preparation of the new Local Plan and recommends that HPBA SA12 is identified as a housing allocation in the Regulation 19 Local Plan, in line with the NPPF’s approach to delivering new homes on grey belt land in sustainable locations close to railway stations.
- The site (approx. 17.7 ha) is located to the south of Potters Bar, north of the M25, and is well-related to the settlement edge, with strong physical boundaries and good access to local facilities, schools, and public transport.
- Proposes a high-quality, landscape-led residential scheme of around 350–400 new homes (exceeding the Council’s indicative capacity of 260 dwellings), with a mix of 1–4 bed dwellings including apartments and

family houses, and 50% affordable housing to meet local needs and “golden rules” for Green Belt release.

- The site is not in agricultural use and is considered “grey belt” with limited constraints; it is available, suitable, and achievable for development, and can be delivered in the first five years of the plan period.
- Access issues have been resolved through the acquisition of 127 Park Avenue, allowing for a new road with cycle lanes and footways; technical work confirms highways and flood risk matters are addressed.
- The masterplan includes new connections, walking and cycling routes, significant landscape buffers, retention of existing trees, and provision for biodiversity net gain and open space.
- Supports the Local Plan’s spatial strategy, the focus on urban extensions, and the use of average densities that would allow for a higher quantum of development (closer to 400 dwellings).
- Suggests the site can deliver new local infrastructure and open space, and is well-placed to support healthy, active lifestyles and sustainable travel.
- Recommends the site’s allocation is increased to 350–400 homes, and that it is brought forward for development in years 1–5 of the plan period.

6.13.24 **CDS Planning** provided a brief response focused on **HPBA SA4** Potters Bar Railway Station Car Park, Darkes Lane. In summary:

- The site, whilst available and deliverable for development, cannot fulfil a building taller than four storeys in accordance with recent discussions with Network Rail. Plans will be submitted for a smaller building delivering circa 26 apartments and commercial space.

Radlett Candidate Sites

6.13.25 **HGH** submitted a response on behalf of **TLC Group** supporting the draft allocation of **HRA SA1 Regency House, Land at 205 Watling Street** for residential development. The representation can be summarised as follows:

- Endorses the site’s inclusion as a candidate for housing, highlighting its status as a vacant, previously developed urban plot in central Radlett, adjacent to retail, services, and excellent transport links.
- Confirms the site is in single ownership (TLC Group), available now, and free from legal or ownership impediments.
- Notes the site is the last plot within the adopted SADM Policy SADM42 (ref TC2) yet to be redeveloped; previous planning permission (May 2019) for a commercial-led scheme has been implemented through demolition and site clearance.
- Technical evidence confirms suitability: ground contamination risks have been addressed through prior demolition and excavation, with any residual remediation to be completed during foundation works. Heritage and edge constraints (adjacent Conservation Area and railway) can be mitigated through high-quality design and acoustic measures.
- Advocates for residential-led redevelopment, citing acute housing need in Hertsmere (current supply at 0.98 years, sixth lowest in England).

- Argues the indicative capacity of 20 units is a significant under-optimisation of this highly sustainable urban site. Proposes vertical intensification to deliver around 110 units, aligning with NPPF guidance to maximise brownfield land and reduce reliance on Green Belt sites.
- Suggests the site can accommodate high-density development while respecting heritage constraints and the extant permission parameters, contributing substantially to early housing delivery in the plan period.
- Requests explicit policy support for Purpose-Built Shared Living (PBSL/Co-living) as an acceptable residential use, to diversify housing mix and meet needs of young professionals, key workers, and single-person households.
- Emphasises co-living schemes would contribute directly to housing targets and supply, referencing London Plan Policy H16 as a benchmark.

6.13.26 **Carter Jonas** submitted a response on behalf of **Cemex UK Properties Limited** supporting the draft allocation of **HRA SA3 Land North of Watford Road and East of Kemprow** for residential development. The representation can be summarised as follows:

- Supports the production of a new Local Plan and the allocation of land around Radlett for residential growth, highlighting the need for an up-to-date plan to deliver sustainable growth and meet national housing targets.
- Confirms the site (6.1ha of managed farmland) is in single ownership (Cemex), available for development, and identified as “grey belt” land with no ecological or landscape significance.
- The site is sustainably located with access to rail, road, and bus infrastructure, adjacent to other proposed allocations, and within walking distance of Radlett town centre and local schools.
- Technical and design studies commissioned by Cemex confirm the site is deliverable and capable of early development in the plan period. No technical delivery constraints have been identified.
- Supports the Local Plan’s spatial strategy to direct growth to the west of Radlett, but requests clarity to avoid piecemeal expansion and ensure prompt delivery of allocations.
- The Sustainability Appraisal (SA) identifies the site as capable of delivering a minimum of 972 homes, with potential for a primary school and wider infrastructure benefits. Cemex argues the site is deliverable independently of adjacent allocations and should not be constrained by other sites.
- Supports the strategic vision for Radlett’s growth and the classification of Radlett as a key settlement, suggesting future development could elevate it to a Tier II settlement.
- Endorses the approach to Green Belt and “grey belt” development, noting the site’s proximity to heritage assets can be addressed through sensitive design.
- Supports draft policies on high-quality design, parking, and biodiversity net gain, aligning with national guidance and local needs.

- Advocates for maximising delivery opportunities from draft allocations to address severe local housing need and affordability challenges (average house prices at 11.92 times median salary).
- Requests the allocation be confirmed in the Regulation 19 Local Plan, with flexibility to deliver a diverse housing mix and significant affordable housing in a sustainable location.

6.13.27 **HCC** as a landowner submitted a response supporting the draft allocation of **HRA SA4 Land South of Watford Road and West of New Road** for residential development. The representation can be summarised as follows:

- Welcomes and supports the inclusion of HRA SA4 as a 'residential candidate site' in the Local Plan, confirming the site is in public ownership (HCC).
- Notes the site is currently in agricultural use and not undeveloped, and highlights that the site size has been reduced due to expansion of the Battlers Green Farm shopping area and adjacent event space.
- Requests amendments to the site boundary to exclude land now included within the expanded shopping area and event space.
- Confirms feasibility work was undertaken in 2022/2023, including planning feasibility, preliminary ecological assessment, flood risk and drainage appraisals, high-level transport appraisal, combined services plan, tree survey and constraints, and facilities plan, all submitted in support of the site's consideration.
- Advises that archaeology, heritage, and updated tree surveys will need to be undertaken as part of future site assessments.
- States that the indicative development capacity of the site should be determined by updated feasibility work.

6.13.28 **Planning Potential** submitted a response on behalf of **Mac Mic Strategic Land Limited, Brace Industries Limited, Home Farm Land (Radlett) Limited, and Affinity Water Limited** supporting the draft allocation of **HRA SA6 Home Farm** for strategic urban extension and mixed-use development. The representation can be summarised as follows:

- Supports the inclusion of Home Farm, Radlett as a Candidate Site under HRA SA6, confirming the consortium's strategic interest and site control.
- The site (approx. 42.44 ha) is located to the southwest of Radlett, within the Green Belt, but is provisionally classified as "grey belt" by the Hertsmere Green Belt Assessment.
- The site is sustainably located, adjacent to Radlett's settlement edge, with strong transport links (rail, road, and bus), proximity to local services, schools, and community facilities.
- Technical evidence submitted includes planning feasibility, ecological, flood risk, drainage, transport, arboricultural, and landscape assessments. The site is considered suitable, available, and achievable, with no legal or ownership impediments.
- The proposed development is based on Garden Suburb principles, providing a framework for high-quality, healthy, and sustainable new

neighbourhoods, including a mix of homes, affordable housing, self-build plots, a primary school, community hub, and employment uses.

- Public consultation has been undertaken, including events, a dedicated website, and engagement with local stakeholders. Pre-application discussions are ongoing with HBC and HCC Highways.
- The site is anticipated to deliver up to 1,040 dwellings, with phased delivery expected within the next five years. The consortium is progressing an outline planning application.
- The representation argues that brownfield land alone is insufficient to meet local housing need, and Green Belt release is necessary. Radlett is identified as a highly sustainable settlement capable of supporting strategic growth and infrastructure investment.
- The submission supports the Local Plan's spatial strategy but recommends a more balanced approach that positively embraces growth opportunities at Radlett and maximises the role of candidate sites.
- Supports draft policies on high-quality design, housing delivery, transport, and biodiversity net gain, with emphasis on optimising capacity without compromising design quality or local character.
- Technical constraints (flood risk, heritage, landscape, access) are acknowledged but considered capable of mitigation. The site is available now and deliverable, with strong market interest and viability.

Bowmans Cross Candidate Sites

6.13.29 **David Lock Associates** submitted a detailed representation to the Hertsmere Local Plan on behalf of **Urban and Civic**, providing detailed comments on policies within the draft Plan as well as submitting supporting evidence in promotion of **HBCA SA1 Land at Bowmans Cross, Courser's Road, Ridge**. Their submission on planning policy can be summarised into the following points:

- Urban & Civic are committed to supporting HBC's strategic objectives for sustainable development and net zero by 2050, with a market-leading sustainability strategy deployed at Bowmans Cross to deliver positive societal and environmental benefits, including much-needed private and affordable homes.
- Recommended that policy standards for sustainability, design, and carbon reduction must be viability-tested in accordance with national guidance (NPPF Paragraph 63), and that flexibility is provided for technical and commercial constraints, especially regarding BREEAM and LETI standards for smaller buildings and challenging requirements.
- Recognised the importance of location and design in responding to the climate emergency, with emphasis on sustainable, walkable, and cycle-friendly development that reduces car use and carbon emissions, and the role of well-designed new settlements (such as Bowmans Cross) in enhancing climate resilience through green infrastructure.
- Supported Hertsmere's approach to green infrastructure, biodiversity, urban greening, and water efficiency, with suggestions to identify delivery opportunities, set realistic targets, and allow flexibility for different site contexts and urban situations.

- Endorsement of the principle that new development should consider and minimise both regulated and unregulated energy emissions, but recommendation that targets focus on regulated energy only, as developers cannot influence unregulated energy use. Support for a local carbon offsetting fund, subject to robust delivery frameworks, reasonable costs, and opportunities for on-site offsets.
- Welcomes Hertsmere's commitment to high sustainability standards but requesting that requirements for embodied carbon assessments be proportional to application stage and complexity, and that assessments be limited to representative samples to ensure deliverability and practicality.
- Supported the strategic objective to increase renewable energy delivery and consider heat networks, but recommending that policies emphasise consideration rather than prioritisation, and recognise the positive contribution of on-site renewable generation to national grid resilience.
- Supported water efficiency targets and circular economy principles, with recognition of practical challenges in achieving net zero waste and requests for policy flexibility.
- Highlighted the need for ongoing engagement and technical assessment to ensure sound, deliverable policies that align with national standards and guidance.

6.13.30 **Apcar Smith Planning** submitted feedback on behalf of **Cobstar Ltd** focused on **Bowmans Cross**, as well as feedback on Policies H2, H4 and H10 and concerns about the timeframes for housing delivery and reliance on large strategic sites. Their submission can be summarised into the following points:

- Opposition to growth around Bushey where it could lead to coalescence with Watford and conflict with Green Belt objectives. There are complexities flagged around multiple land ownerships, infrastructure requirements, and viability.
- Strong support for Policy H10, viewing it as an important mechanism to boost housing delivery in the early years of the Local Plan, though could be clearer on the requirement for sites to be delivered in a "timely manner", including whether this means within 5 years or 10 years.
- Support for both Policy H4 and Policy H10 as necessary measures to help address the Borough's housing shortage and improve housing delivery.
- Concern that the majority of proposed housing allocations will not come forward until more than ten years into the plan period, with only 291 dwellings expected to be delivered within the first five years. The delivery trajectory is unrealistic and unlikely to address immediate housing needs.
- Support for more smaller and deliverable sites to come forward in the short term.
- Concern about heavy reliance on Green Belt sites, with over 83% of proposed dwellings on Green Belt land. Some proposed urban extensions involve Green Belt land previously considered to perform strongly for Green Belt purposes.
- There are inconsistencies in Policy H2 around Green Belt site promotion.

- Objection to concentrating growth around the four main settlements of Borehamwood, Potters Bar, Bushey and Radlett, where smaller, deliverable settlements should also contribute towards housing growth and can come forward sooner

Employment Candidate Sites

6.13.31 **Lawson Planning Partnership Ltd** submitted a representation on behalf of **Orbital Data Centres Ltd** supporting the allocation of **HEM SA01 Land Southeast of Junction 24 (M25), north of the Ridgeway** for strategic employment use, specifically for a data centre development. The key points are:

- Supports the proposed employment land allocation of HEM SA01 and requests its retention and progression in the next stage of the Local Plan, aligning with the parallel allocation in the London Borough of Enfield (LBE) Local Plan (Policy RUR.04), to enable a coordinated cross-boundary data centre development.
- The site (approx. 11.65 ha) is located north of the Ridgeway and adjacent to the M25, with about half the area within Hertsmere. Orbital Data Centres Ltd has acquired the site and intends to deliver a large-scale, phased data centre scheme, with an estimated floorspace of around 60,000 sqm, subject to further design and planning.
- The proposal includes data centre buildings, offices, storage, associated plant, substations, security facilities, new access, parking, landscaping, biodiversity enhancements, and supporting infrastructure. The site is well-located for power, fibre connectivity, and water, and can be delivered quickly after planning permission.
- The representation highlights the national significance of data centres, recently classified as Critical National Infrastructure (CNI), and notes the urgent need for additional capacity to support the UK's digital economy.
- Technical work undertaken includes landscape and visual impact assessment, ecological surveys, agricultural land classification (confirming the site is not best and most versatile land), ground investigations, and UXO risk assessment, all demonstrating the site's suitability and low environmental constraints.
- Further technical studies on transport, flood risk, drainage, utilities, and heritage are underway, with a joint Planning Performance Agreement (PPA) in progress with both Hertsmere and LBE. The intention is to submit a single outline or hybrid planning application for the whole site later this year.
- The submission references the Council's evidence base, including the HEELA and Green Belt Assessment, which support the site's suitability, availability, and achievability for employment use, subject to Green Belt release.
- The agent requests that the Local Plan's supporting text is updated to reflect the cross-boundary nature of the allocation and the coordinated approach with LBE, ensuring policy consistency and comprehensive development.

6.13.32 **David Lock Associates** submitted a representation on behalf of **Equinix**, promoting **HEM SA02 Land East of South Mimms Service Station** that

supports the allocation of the Hertfordshire Data Centre Campus as a key employment site. The representation also made comments on the plan-led approach, cross boundary matters and strategic employment and infrastructure needs. The representation can be summarised as follows:

- Expressed support for HBC's positive engagement with neighbouring authorities, aligning with the Duty to Cooperate and strategic planning across Southwest Herts and outer London. Welcomes recognition of data centre needs as a strategic issue and looks forward to continued collaboration as the Local Plan progresses.
- Supports the establishment of an up-to-date, plan-led framework that is sound, legally compliant, and capable of managing growth sustainably. Endorses the inclusion of data centre development within the spatial strategy and employment land supply, noting the importance of robust evidence and effective joint working for strategically significant growth locations.
- Strongly supports the allocation of the Hertfordshire Data Centre Campus (HEM SA02) as an employment commitment, based on extant planning permission. Welcomes the site's inclusion in the Borough's committed employment land supply and its identification as a Strategic Level Employment Site under emerging Policy EC5, serving needs beyond Hertsmere.
- Committed to coming forward with condition and reserved matters applications to deliver the site.
- Endorses the ambition of sustainability policies in the draft Plan, advocating for high standards of carbon reduction and sustainable energy strategies, including Power Purchase Agreements (PPAs). Supports the circular economy approach and alignment with Equinix's Net-Zero Carbon Reduction Plan and Global Sustainability guidelines. Highlights Equinix's leadership in sustainability and commitment to BREEAM and other certifications.
- Highlights the need for further evidence base documents (Carbon Assessment, CIL Review, Local Area Energy Plan, Landscape Impacts Assessment, Settlement Visions Spatial Strategy).
- Expresses gratitude for the opportunity to participate in the consultation, broadly supports the emerging evidence base, and requests continued opportunities for input as new evidence is published. Offers contact for further queries and confirms commitment to collaborative working with HBC and stakeholders.

6.13.33 Lichfield's submitted a response on behalf of **Legal and General Investment Management** supporting the allocation of **HEM SA03 Borehamwood Industrial Area Extension** as a key employment site, the representation can be summarised in the following key points:

- Supports allocation HEM SA03 (Borehamwood Industrial Area Extension), including Sky Studios Elstree (SSE) and Sky Studios Elstree North (SSEN), as a key employment site.

- States HEM SA03 is essential to meet identified employment needs, particularly for the film and television sector, and supports Borehamwood's role as Hertsmere's main employment hub.
- Highlights that existing employment areas, including Elstree Way, have limited capacity, making expansion through HEM SA03 necessary.
- Strongly supports retaining HEM SA03 through the Local Plan process to avoid constraining future economic growth and investment.

6.13.34 **HGH** submitted representations on behalf of **Nolan Brothers Properties Ltd** supporting the allocation of **HEM SA05 Land Northeast of Elton Way** for employment use, specifically for B8 (storage and distribution) floorspace. The key points are:

- Supports the Council's proposed allocation of HEM SA05 for approximately 45,000 sqm of B8 employment floorspace, reflecting the site's sustainable location and capacity.
- Confirms the site is "deliverable" in accordance with the NPPF, with outline permissions already secured (LPA Refs: 23/1035/OUTEI and 24/1283/OUTEI) and reserved matters submitted (LPA Ref: 26/0204/REM), demonstrating immediate availability and a strong prospect of early delivery.
- Technical deliverability is evidenced by committee reports for the permissions, confirming the site can accommodate the proposed floorspace and that there are no known technical barriers to delivery.
- The Green Belt Assessment 2026 identifies HEM SA05 as "provisionally grey belt" within Parcel OGB-037, with no contribution to sprawl or historic setting and only a moderate contribution to merging. HGH argues the site is clearly "grey belt," fully enclosed by the M1 and A41, and requests its formal removal from the Green Belt in the Submission Local Plan.
- Strongly supports the Council's proposal to designate the Tylers Way cluster (including HEM SA05) as a "Main Employment Area" under Policy EC2, recognising its role as a strategic economic hub and "last mile" logistics location.
- Recommends redrawing the Green Belt boundary to follow the permanent physical barriers of the M1 and A41, aligning policy with the area's established employment use and removing any provisional status.
- Requests that site-specific and area-wide policies provide sufficient flexibility to support the operational requirements of modern logistics, ensuring HEM SA05 can fulfil its role as a primary logistics hub.

6.13.35 **Savills** submitted representations on behalf of **Ark Estates 5 LTD** supporting the allocation of **HEM SA06 The Mercure Hotel and Land to East** for employment use, specifically for data centre development. The key points are:

- Strongly supports the proposed allocation of HEM SA06 as an employment site and its designation as a Main Employment Area under Policy EC2, recognising the site's established planning position and suitability for employment-led redevelopment, particularly for a data centre campus.

- Confirms that a full planning application (ref: 25/1781/FUL) for a data centre campus has been submitted and validated, following extensive pre-application engagement with the Council and stakeholders. The proposed development includes data centre buildings, energy/power/water infrastructure, access, landscaping, and associated works.
- Highlights the site's strategic location within the Tylers Way employment cluster, with access to power, fibre connectivity, and the scale required for a modern data centre, contributing to meeting acute regional and national data centre needs.
- Requests that the allocation wording is refined to explicitly support data centre uses, reflecting both the Council's evidence base and the site's current promotion, and to avoid ambiguity that could constrain delivery.
- Objects to the continued Green Belt designation of the site alongside its allocation, arguing this creates policy inconsistency and uncertainty. Requests the site is removed from the Green Belt to provide clarity and align with the treatment of other allocations.
- Recommends removing or making flexible the indicative floorspace figure (currently 30,000 sqm), as it is based on historic consents and does not reflect the operational requirements of data centres, which differ from traditional B8 uses.
- Supports the overall direction of employment policies (EC1, EC2, EC3, EC10), but requests that requirements for affordable workspace and design standards are applied flexibly to reflect the specific operational and security needs of data centres.
- Supports the emphasis on training and digital skills, recommending obligations are tailored to the nature of data centre employment.
- Recommends the introduction of a dedicated data centre policy or expanded supporting text to provide clear guidance for such proposals, given their strategic importance and unique requirements.

6.13.36 **Boyer** submitted feedback on behalf of **Miller Homes**. Their submission can be summarised into the following points:

- Objection to the Plan period, finding it to be too short and inconsistent with NPPF requirements. The Plan should instead cover an 18-year period.
- Support applying a 20% buffer to housing supply requirements due to Hertsmere's low Housing Delivery Test (HDT) performance. Applying a 20% buffer over an 18-year period would increase the requirement to around 18,430 homes.
- Objection to the Council's housing requirement methodology, suggesting the Council should plan for a higher overall housing figure.
- The response notes that plot numbers, HELAA references, site allocations, and candidate site references are not provided.

6.13.37 **Forge Bio GP Ltd** submitted a response focused on the approach to employment sites and housing targets. The feedback includes the following points:

- Agrees that the housing target should include the Standard Method plus a 20% buffer, advising that the overall requirement across the 16-year plan period should be approximately 17,170 homes.
- If housing targets are not based on the Standard Method plus the 20% buffer, the Draft Plan would not comply with NPPF Paragraph 36 and could be considered unsound.
- Recommends that the approach to protecting employment sites should follow the current Local Plan, where protection of commercial/business uses applies only to Class E(g)(l) office uses.
- The response states Policy EC9 should include a clear test for the loss of non-designated employment sites. This strengthening of the Policy would make it more justifiable and effective.

Omission Sites

6.13.38 A total of 40 representations were made to the consultation by promoters, landowners and agents promoting sites that were omitted from the list of candidate sites. Numerous omission sites were promoted across the borough, particularly in Bushey, Radlett, Borehamwood, Shenley and South Mimms, with landowners arguing these sites are sustainable, deliverable and should be allocated within the Local Plan.

6.13.39 A list of omission sites, with site addresses and the site promoter, is set out in the table below.

Table 5. List of Omission Sites submitted to the consultation

Site Address	Consultee Name
The Imperial, Old Orleans, Elton Way, Bushey, Watford, WD	CDS Planning
Land at Oxhey Lane (HELAA - CFS-2025-165)	Statement Planning
Patchetts Cottage, Hillfield Lane, Patchetts Green	CHS Planning
Land south of White Park, Elstree Hill	DLP Planning Ltd
Town Farm, South Mimms	DPP Planning
Land south of Merry Hill Road and West of Robinson Crescent	HGH Consulting
Land at Dagger Lane, Bushey	HGH Consulting
Land West of Watling Street, Radlett	Neame Sutton Limited
Land to the east of Barnet By-Pass (A1), Hertfordshire, EN5 3HW	Pegasus Group
Land North of Little Bushey Lane, Bushey	Savills
Land North of Sailsbury Hall	Savills
Land west of Barnet Road and east of Baker Street, to the South of Potters Bar	Woolf Bond Planning
Land to the west of Kimptons Mead, Potters Bar	Woolf Bond Planning
Land west of Porters Park Drive, Shenley	Woolf Bond Planning
Land at Hill Farm, Radlett	Warner Planning
Wheatsheaf Farm, Well End Road, Borehamwood	Warner Planning
Land at Shenley Grange East, Shenley	Warner Planning
Land at Radlett Lane, Shenley	Boyer Planning

Land North of Stapleton Road, Borehamwood	Boyer Planning
Land off Stables End, Palomino Place, Patchetts Green, Aldenham, WD25 8EU	Warner Planning
Land Formerly Part of Earl & Cross Keys Farm (North & South), South Mimms	Boyer Planning
Land off Blanche Lane, South Mimms, EN6 3NZ	Warner Planning
Land North of Watford Road and West of Oakridge Avenue, Radlett	Warner Planning
Tyler's Farm (Plot 1 & 2), Bushey	Boyer Planning
Land adjacent to Watersplash Mews, Theobald Street, Borehamwood WD6 4DG	Warner Planning
Land at Shenley Grange West, 43 London Road, Shenley WD7 9ER	Warner Planning
Land Adjacent to and to the rear of 52 Harris Lane, Shenley WD7 9EG	Warner Planning
Land Adjacent to the Former Wyevale Garden Centre, Dancers Hill Road, Bentley Heath EN5 4RR	Warner Planning
Land at Caldecote Farm, North of Elstree Road, Bushey Heath	Warner Planning
Rectory Farm and land to the south of Rectory Farm. Shenley	Savills
LAND AT CHURCH LANE, ALDENHAM	Stantec
land at Aldenham Golf & Country Club, WD25 8NN	Savills
Land at Aldenham Road, north of A411, Elstree	DPP Planning
Land at Harper Green, Harper Lane, Radlett	Pegasus Group
Land south of Potters Bar	Pegasus Group
Land South of Harper Lane Industrial Estate and Harper House	Derek Paul Bromley
Land at Blanche Lane, South Mimms, Hertfordshire, EN6 3LD	Newmark
Land at the South West Side of Bushey Mill Lane, WD23 2AB	LSH
Shenleybury House, Black Lion Hill, Shenley	HGH Consulting
Land Adjoining Bushey Hall Farm, Berry Grove Lane, Watford, WD23 2AB	LSH

6.13.40 The key issues raised by the promoters of omissions sites can be summarised as the following:

- Strong support for meeting housing needs in full, with many respondents arguing the Standard Method should be treated as a minimum and supplemented by buffers, additional allocations and flexibility to address Hertsmere's housing under-delivery and reported housing land supply shortfall.
- Widespread calls for greater release of grey belt land, with many developers supporting the Council's grey belt methodology and promoting specific grey belt or provisionally grey belt sites for housing and employment development.
- Concerns that the spatial strategy relies too heavily on large strategic allocations, regeneration and windfalls, with repeated requests for more small and medium-sized sites that could be delivered earlier and provide flexibility in maintaining housing supply.
- Employment land promoters argued that the Plan underestimates future employment and logistics needs, seeking additional employment

allocations, particularly for B8/logistics uses in locations close to the strategic road network.

- Many respondents supported affordable housing delivery but sought viability flexibility, including review mechanisms, cascade approaches and reduced obligations where policy requirements could affect scheme viability.
- Several developers objected to emerging development management, climate change and green infrastructure policies, arguing requirements relating to carbon reduction, urban greening, biodiversity, water efficiency, heat networks and Health Impact Assessments are overly prescriptive or exceed national policy requirements.
- There was strong support for prioritising brownfield and previously developed land, although many respondents argued opportunities outside the main settlements and additional Green Belt/grey belt releases should also be considered.
- A number of representations challenged the evidence base and site assessment process, including Green Belt classifications, housing and employment capacity assumptions, infrastructure evidence, deliverability assessments and treatment of committed developments.
- Many respondents requested amendments to the Local Plan process and policy framework, including extending the plan period, improving policy clarity, updating evidence, producing clearer maps and ensuring greater flexibility to respond to future housing and employment needs.

6.13.41 The representations from the promoters of omission sites have been considered when developing Council's spatial strategy and housing strategy, have been assessed through the site selection process and been considered in the assessment of reasonable alternatives within the sustainability appraisal.

Conclusion

6.14 Summary of Outcomes

- 6.14.1 The Regulation 18 consultation provides an important opportunity for the Council to test early Local Plan options before moving towards a more detailed Regulation 19 draft. The consultation is used to gather views on the emerging spatial strategy, potential site options and policy direction, while also identifying matters that require further evidence, clarification or refinement.
- 6.14.2 Many points made in Regulation 18 consultation representations are helping to shape the Regulation 19 draft Plan as it is being prepared.
- 6.14.3 On some matters, despite recognising that many consultees are concerned or opposed to what the Plan is proposing, options for the Local Plan are limited. The primary factor in this is that national government requires all councils to plan to meet identified needs for housing and economic growth. This is also necessary to ensure that current and future residents have access to suitable homes and employment opportunities in sustainable locations that meet the needs of future households and businesses.
- 6.14.4 The Local Plan will help to shape where development takes place but must be backed up by evidence that allocated sites are suitable, available and likely to be economically viable. These parameters are explored in the Local Plan [evidence base](#).
- 6.14.5 As only a limited number of sites meet these criteria, and the housing and employment needs identified for Hertsmere are significant, the Council has limited choice on where future growth can be accommodated.
- 6.14.6 However, there are choices to be made on which sites to proceed with and how, as well as to determine which areas are more or less sustainable for growth.
- 6.14.7 Without a Plan to make these choices, development will be located and shaped primarily based on where it makes most commercial sense for landowners and agents to bring forward development. While this is also important, the benefits for the whole borough, its residents and businesses, can be improved if growth is coordinated, and aligned with broader priorities.

6.15 How Consultation is Influencing the Plan

- 6.15.1 The following process ensured that all points made in the consultation representations on the Regulation 18 Local Plan and its evidence were taken into account when drafting and revising the Regulation 19 Local Plan and its evolving evidence:
- All points raised in the consultation were tagged, grouped and summarised as part of the consultation processing.
 - All representations were summarised by stakeholder type, and in more detail, by individual stakeholder in the case of statutory consultees.

- Both types of summaries were provided to, and taken into account by, the Hertsmere Local Plan team through interim, draft and final versions of this Consultation Statement during the drafting of the Regulation 19 version of the Plan. This enabled issues raised through consultation to be considered as early as possible and allowed Plan preparation to be expedited.
- Responses to the summarised points were first drafted and then provided to and edited by the Hertsmere Local Plan team, to show that points made were taken into account wherever possible, within the confines of national planning policy, guidance and legislation.
- Representation summaries, and where relevant, full responses (e.g. for infrastructure providers and other key stakeholders) were shared with all the consultants producing the evidence base supporting the Regulation 18 and 19 versions of the Local Plan, who contributed to responses made to each point raised, as well as taking points made into account where relevant to finalising their respective studies.
- Finally, a consultant team undertook a peer review of the Regulation 18 Plan. The reviewers were integrated into the representation-processing work so that relevant issues raised through consultation could inform their review of the emerging Regulation 19 policies. Interim, draft and final peer-review findings were provided to the Hertsmere Local Plan team and taken into account as the Regulation 19 Plan was prepared and revised, with a particular focus on soundness.

6.16 Next Steps

- 6.16.1 This statement shows how HBC has engaged with stakeholders during the Regulation 18 Consultation on the Local Plan. It summarises representations in line with key themes, who responded, a summary of what they said, how the Council responds to the points made, and how the Regulation 19 Plan is likely to evolve in response to representations made.
- 6.16.2 The next steps are for the Council to work on the Regulation 19 draft of the Local Plan, including proposed allocations and policies, considering the feedback from the Regulation 18 consultation as well as all relevant emerging and evolving evidence.
- 6.16.3 A Regulation 19 draft will then be published alongside further evidence for representations on legal compliance and soundness. After this, the Plan will be submitted to the Secretary of State for Examination in Public. Once the Plan has been found sound by the appointed Inspector, which will be explored in hearing sessions themed in line with key matters explored by the Plan, the Plan will be adopted by the Council and become part of the statutory development plan, against which future planning applications are evaluated, granted or rejected.

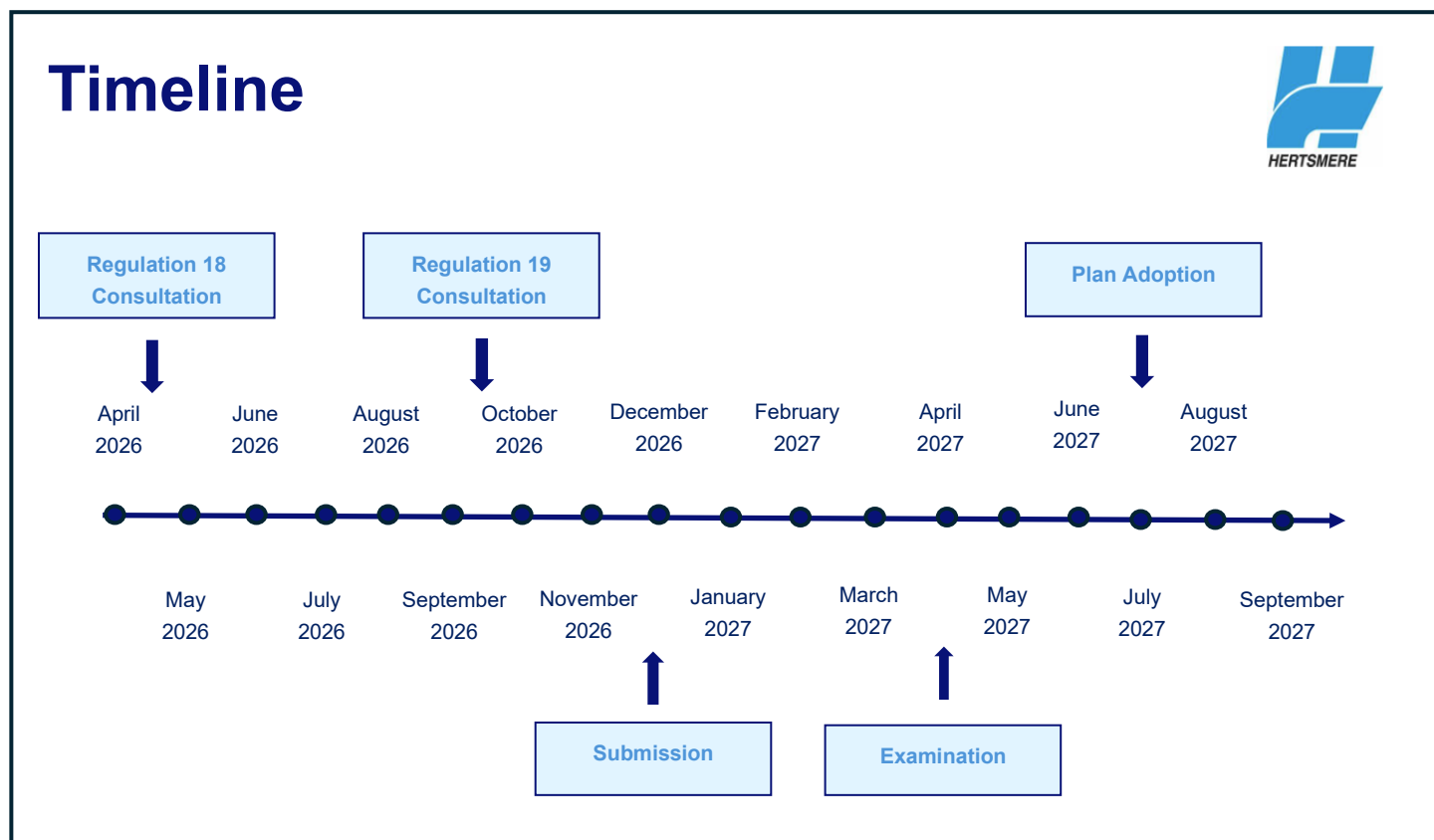


Figure 5. Timeline of next stages for the draft Local Plan

Appendix A – Press Releases, Social Media Posts, adverts and other promotions of the Local Plan consultation

A.1 Local Plan Branding

The following branding materials were developed for use throughout the Regulation 18 consultation period to provide a clear and consistent visual identity for the emerging Local Plan.



Figure 6. Banner displaying the Hertsmere Local Plan branding used across the website, social media, and promotional materials

A.2 Consultation Event Promotion Materials

A programme of public information events was promoted throughout the consultation period. Promotional material provided details of event dates, venues, times and opportunities to engage with officers.

The poster features a blue sky background with white clouds and three birds in flight. At the top right is the Hertsmere logo, a stylized blue 'H' with the word 'HERTSMERE' underneath. Below the logo is a row of five circular icons: a red circle with a tree and sun, an orange circle with three people, a yellow circle with a house, a green circle with a person on a bicycle, and a blue circle with a location pin. The main title 'Hertsmere Local Plan' is in large, bold, blue font, with 'Hertsmere' on the top line and 'Local Plan' on the bottom line. Below the title is the tagline 'Delivering a better future' in a smaller, bold, blue font. The text 'Our public consultation on a new Local Plan for Hertsmere has been launched. We are accepting feedback via our consultation platform until Friday 29 May.' is in a standard blue font. Below this is the text 'The consultation will include seven public information events, which will allow residents to discuss early ideas for the new Local Plan with the team from Hertsmere Borough Council.' followed by 'Each event will run from 2:30-8:00 pm.' and a bulleted list of seven events. At the bottom, a dark blue box contains white text for more information and a QR code on the right.

Hertsmere
Local Plan
Delivering a better future

Our public consultation on a new Local Plan for Hertsmere has been launched. We are accepting feedback via our consultation platform until Friday 29 May.

The consultation will include seven public information events, which will allow residents to discuss early ideas for the new Local Plan with the team from Hertsmere Borough Council.

Each event will run from 2:30-8:00 pm.

- Monday 27 April: South Mimms Village Hall, EN6 3PD
- Wednesday 29 April: Borehamwood Civic Centre, WD6 1WA
- Thursday 30 April: Radlett Centre, Radlett, WD7 8HL
- Wednesday 6 May: The Manor Elstree, Elstree, WD6 3RE
- Monday 11 May: Shenley Chapel, Shenley, WD7 9EZ
- Monday 18 May: Wyllyotts Theatre, Potters Bar, EN6 2HZ
- Tuesday 19 May: St James's Church House, Bushey, WD23 1BD

Find out more:
www.hertsmere.gov.uk/newlocalplan
Have your say:
www.hertsmere.localplan.commonplace.is/
Email: local.plan@hertsmere.gov.uk



Figure 7. Poster promoting the consultation and public information event



Our public consultation on a new Local Plan for Hertsmere has been launched. We are accepting feedback via our consultation platform until Friday 29 May.

Find out more:

www.hertsmere.gov.uk/newlocalplan

Have your say:

www.hertsmere.localplan.commonplace.is/

Email: local.plan@hertsmere.gov.uk



Figure 8. Double-sided postcard promoting the consultation

A.3 E-Newsletters and Bulletin Communications

Regular communications were issued through Council newsletters and stakeholder bulletins to raise awareness of the consultation and provide updates regarding opportunities to participate.

A.4 Social Media Campaign

Social media formed a key component of the consultation communications strategy, helping to raise awareness of consultation events and encourage participation. Guidance was also provided via social media on how to provide consultation feedback, demonstrated with a video. The video can be viewed at:

www.youtube.com/watch?v=kVrpYT2uW4k&t=1s

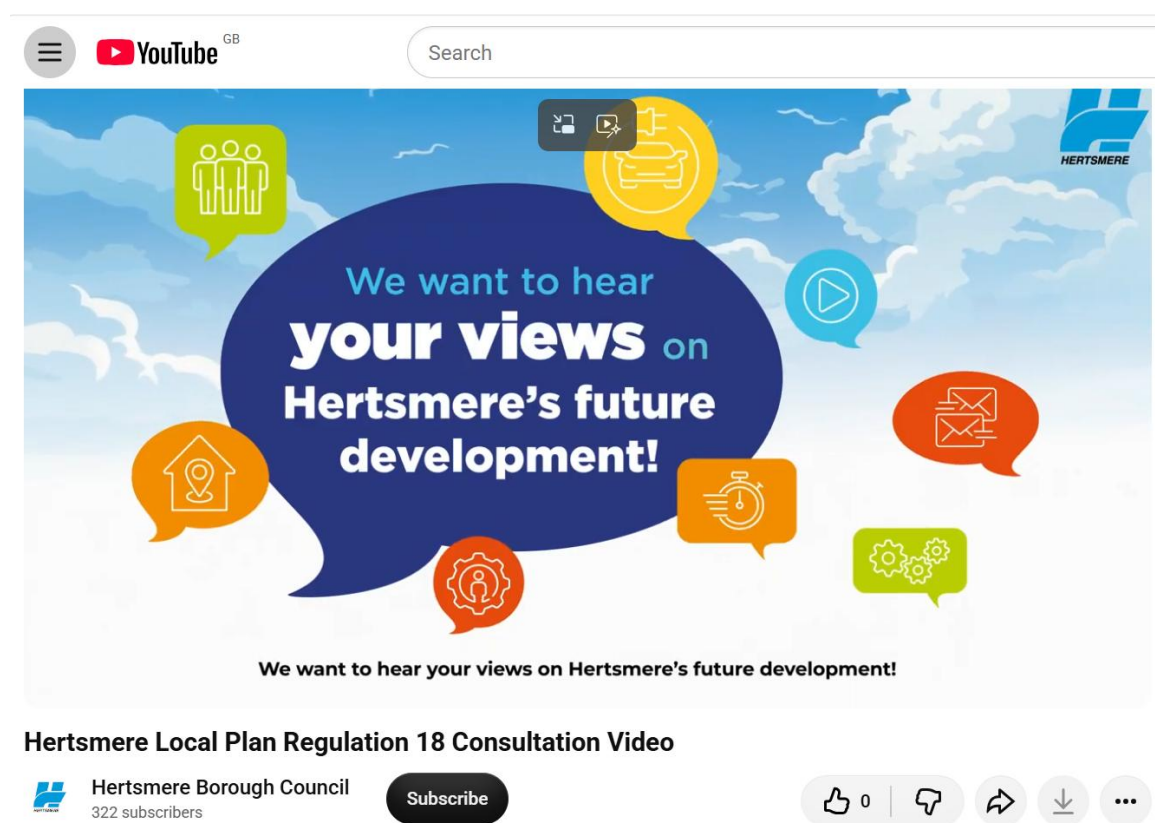


Figure 9. Still image of the explainer video for providing consultation feedback

A.5 Press Releases

Press releases were issued at the launch and close of consultation in order to keep the public informed on the process and how they could get involved.



Hertsmere Borough Council Publishes Local Plan Consultation Document

07 April 2026

Hertsmere Borough Council has published its Local Plan Consultation Document setting out how future development across the borough could be managed and assessed, ahead of a formal public consultation.

The publication of these documents marks the next stage in the Local Plan process. It includes a long list of 'candidate' sites that could form part of the council's response to the Government's updated housing requirements. This stage of the process, known as a 'Regulation 18' consultation, is designed to enable residents to provide views on the suitability of those sites prior to a final list of sites being produced. The consultation is also an opportunity for local people to provide feedback on the spatial strategy and planning policies which will underpin the new plan.

The Local Plan process gives the council the ability to take control of how development comes forward across Hertsmere, identifying the most appropriate locations and ensuring that new homes are delivered alongside the infrastructure local communities need, including schools, healthcare, transport and green spaces.

Government planning policy requires all councils to plan for a set number of new homes, with targets determined at a national level rather than locally. While the council does not determine the overall level of development in Hertsmere, the Local Plan can determine where and how that development is delivered.

Without an up-to-date Local Plan, development would be more likely to come forward through speculative applications and the appeals process, reducing the community's ability to influence where and how development comes forward.

The proposals published today have been informed by a borough-wide spatial strategy, which looks at how growth can be distributed in a coordinated way.

No decisions have yet been made about where development will take place. The publication of these documents is an opportunity for residents, businesses and community groups to review the proposals and to respond in the upcoming consultation.

We are required through government planning policy to plan for new homes. The Local Plan process is how we take control of where that development happens and ensure it is supported by the infrastructure our communities need.

Without a Local Plan, development will still come forward, but in a way that is less coordinated and with less opportunity for communities to influence the outcome.

This process is about making sure that, as a borough, we are planning positively for the future, and that development is delivered in a way that works for Hertsmere.

The council will shortly be launching a formal public consultation, giving residents and stakeholders the opportunity to have their say on the proposals. The consultation will include in-person events, an online engagement platform, and deposit locations for hard copies of the draft Local Plan to enable residents to submit questions and feedback.

Consultation feedback will help inform the further development of the Local Plan, ahead of subsequent public consultation and an independent examination.

The documents can be viewed at the agenda listings for Cabinet and Extraordinary Full Council on Wednesday, 15 April - [Monthly meetings calendar - April 2026](#).

Figure 10. Press Release – 7th April 2026



Hertsmere Borough Council has launched a public consultation on a new local plan for the borough

16 April 2026

Hertsmere Borough Council has launched a public consultation on a new local plan for the borough, following a vote from Councillors at a meeting of the Full Council yesterday evening. Feedback is being welcomed until Friday 29 May.

The six-week 'Regulation 18' consultation provides residents, businesses and interested parties with the opportunity to share their views on the council's early ideas for the future development of Hertsmere.

The decision to progress to public consultation on the plan is an important step in securing certainty, investment and coordinated growth for Hertsmere, and will help to protect the borough from speculative development and appeal-led growth.

The new plan will set out how Hertsmere can grow in a green, sustainable and equitable way, with benefits for all those who live and work in the borough. As a key planning document, it will indicate how and where new development can come forward, from homes and employment space to schools, health services, and new green space.

Government policy requires every local council to maintain an up-to-date local plan, which provides the framework for planning decisions in its area. A local plan can allocate sites for development and set policies that guide how new development is delivered, while protecting the

fabric of the local area. As Hertsmere's current local plan was passed in 2012, it is no longer considered up to date.

The proposals have been informed by a borough-wide spatial strategy, which looks at how growth can be distributed in a coordinated way. The consultation is an opportunity for local people to provide feedback on this spatial strategy, as well as the planning policies which will be used to determine planning applications in the future.

The consultation features a long list of candidate sites to be assessed as potentially making a contribution to the area's housing needs. Nothing has been decided, and the consultation is the single best opportunity for local people to have their say on how they want to see the borough develop.

Without an up-to-date local plan, development would be more likely to come forward through speculative applications and the appeals process, reducing the community's ability to influence where and how development comes forward.

The Regulation 18 consultation will feature seven public information events across the borough.

In person events are scheduled for 2:30pm to 8:00pm at the following dates and venues:-

- Monday 27 April: South Mimms Village Hall, South Mimms, EN6 3PD
- Wednesday 29 April: Borehamwood Civic Centre, Borehamwood, WD6 1WA
- Thursday 30 April: Radlett Centre, Radlett, WD7 8HL
- Wednesday 6 May: The Manor Elstree, Elstree, WD6 3RE
- Monday 11 May: Shenley Chapel, Shenley, WD7 9EZ
- Monday 18 May: Wyllyotts Theatre, Potters Bar, EN6 2HZ
- Tuesday 19 May: St James's Church House, Rectory Lane, Bushey, WD23 1BD

Find out more at the new Local Plan web-page: [Draft Local Plan 2026: A new sustainable Local Plan for Hertsmere - Hertsmere Borough Council](#)

The six-week consultation will run until Friday 29 May.

The consultation document can be viewed, and feedback provided, at <https://hertsmere.localplan.commonplace.is/>

Figure 11. Press Release – 16th April 2026

Appendix B – Consultation Material from In-Person Events



Figure 12. Image of the public information event at Borehamwood Civic Centre



Figure 13. Image of an event attendee viewing consultation materials at The Manor Elstree



Figure 14. Image of an event attendee viewing consultation materials at The Manor Elstree

Appendix C - Hertsmere Local Plan Regulation 18 Consultation – Summary of Key Information

(as published by HBC as part of Regulation 18 consultation)

What is this document about

The Regulation 18 draft and consultation represented an early formal stage in preparing the new Hertsmere Local Plan. A Local Plan sets out how the borough will grow over time. It identifies where new homes, jobs, infrastructure and services should be located. It also includes policies that will be used to decide planning applications. This consultation gave people the opportunity to comment on the overall approach before a more detailed version of the plan is prepared. It is important that the document is read as a whole. The plan is based on a joined-up strategy rather than individual decisions taken in isolation.

Why a Local Plan is needed

Every council is required to prepare a Local Plan. A key part of this is meeting the borough's housing requirement. This is the number of homes that need to be planned for over the plan period. The plan must show how this requirement will be met in full. Without an up to date Local Plan, it becomes much harder to manage development. Planning decisions are more likely to be made on a case by case basis, with less local control over where growth takes place. Having a clear and up to date plan allows the Council to take a planned approach to growth and infrastructure.

What the plan is trying to achieve

The Local Plan sets out a spatial strategy. This explains where development should go and why. The strategy focuses on making best use of existing towns and settlements, directing growth to locations with access to infrastructure, and supporting regeneration where possible. The plan is supported by a set of planning policies. These are used to guide development and assess planning applications. Each policy explains what it is trying to achieve and how it will be delivered. Questions are included throughout the document to invite feedback on both the strategy and the policies. The Plan also aims to improve town centres, creating places which offer a range of leisure, working and public realm opportunities through urban design and master planning.

Where growth is proposed

The plan directs most growth to Hertsmere's main settlements. These are Borehamwood, Potters Bar, Bushey and Radlett. These locations are considered the most sustainable. They already have existing services, transport links and infrastructure which can be improved to support additional development. The plan also explores the potential for a new settlement in the north of the borough. This could provide a way to deliver a larger amount of development in a planned and coordinated way, including infrastructure from the outset.

Candidate sites for development

The document includes a list of candidate sites. These are locations that could potentially be developed. Each site is supported by information on the type of development that could take place, the mix of uses, an indicative scale of development, and when the site could come forward. Including a wide range of sites is important. The Local Plan must demonstrate that there is enough suitable land available to meet the borough's needs.

Taking account of previous feedback

This is not the first time that Hertsmere have shared a Regulation 18 version of the plan, and earlier consultations have already taken place. The Council has considered this feedback in preparing the current document. However, the context has changed since earlier versions of the plan. This includes changes to national planning policy, an increase in housing need, and wider economic and social changes. Despite these changes, a number of consistent themes have emerged from previous feedback. These include the importance of protecting the Green Belt where possible, focusing growth in existing towns, protecting green spaces and the natural environment, ensuring infrastructure is provided alongside development, and achieving high quality design. These themes continue to influence the emerging plan.

This stage of consultation

This is a Regulation 18 consultation. This is an early stage in the plan making process. At this stage, the Council is seeking views on the overall strategy, the approach to growth, and the range of potential development sites. People are encouraged to consider how different elements of the plan fit together. Comments on individual sites should take into account the wider strategy and the need to meet housing requirements in full. All responses will be reviewed and used to inform the next version of the plan.

What happens next

Following Regulation 18, the Plan is refined and the proposed submission Local Plan is published under Regulation 19 for representations on legal compliance and soundness. Following Regulation 19, the Plan is submitted for independent examination. During examination, an independent Planning Inspector assesses whether the Plan has been prepared in accordance with the relevant legal and procedural requirements and whether it is sound. Subject to the examination process and any necessary main modifications, the Council may then adopt the Plan.

What makes a plan sound

To be approved, the Local Plan must meet four tests of soundness. These are set out in the National Planning Framework.

1. Positively prepared: The plan must meet the borough's needs, including housing.
2. Justified: The strategy must be based on evidence and be the most appropriate option.
3. Effective: the plan must be deliverable over time.
4. Consistent with national policy: the plan must follow national planning guidance.

If a plan does not meet these tests, it will be rejected by the Inspector. This may result in the plan being withdrawn and redone. This can lead to delays and reduced

control over development which can leave settlements vulnerable to unmanaged development.

Why the plan needs to move forward now

Preparing the Local Plan is a priority. This reflects changes in national planning policy, increased housing requirements, and wider changes affecting local government. Progressing the plan now helps ensure that future development is planned in a coordinated and sustainable way.

How the plan is organised

The Local Plan is structured to guide the reader through the strategy and supporting policies. It includes a borough wide spatial strategy, planning policies that apply across the area, policies for individual towns and places, and site allocations. These elements work together to deliver the overall vision for the borough.

Early chapters of the plan

The opening chapters of the plan will provide background and context. This includes how the planning system works, how the plan has been prepared, how to use the document, and the role of different types of policy. They will also describe Hertsmere today and consider how it may change in the future.

How to respond to this consultation

The Council is inviting comments on all parts of the document. You can respond by

- answering the questions set out throughout the document
- providing comments on specific policies or sites
- sharing views on the overall strategy

It is helpful to explain your reasons clearly and, where possible, suggest alternatives. Responses should consider the plan as a whole. This includes the need to meet housing requirements, provide infrastructure, and plan for growth in a coordinated way. All responses received will be reviewed carefully and will help shape the next stage of the Local Plan.

Overall message

This document sets out the foundations of the new Local Plan. It explains why growth needs to be planned, how much development is required, where development could take place, and how people can take part in shaping the plan. The aim is to plan positively for the future of Hertsmere, while balancing the need for new development and regeneration with the protection of the borough's character and environment.

Appendix D – Consultation Summaries and Responses

Theme	Sub-Theme / Issue	Summary	Response
Delivery & Monitoring	Delivery	Support / need for stronger housing delivery mechanisms	<i>To ensure housing delivery, HBC's key focus is on developing a robust housing trajectory and five-year housing land supply with realistic assumptions on delivery of the housing requirement over the plan period. At a later point in the plan making process, HBC are looking to develop a topic paper to set out associated assumptions, including any planned housing delivery interventions to accompany the Council's Housing Delivery Action Plan. This may include measures such as time limited consents, and the consideration of past delivery performance as a material matter for renewals of planning permissions.</i>
Delivery & Monitoring	Delivery	Opposition to proposed approach to penalise applicants where consented proposals have not been implemented in accordance with agreed milestones, as this fails to acknowledge that housing delivery can be delayed by other factors (e.g. policy, regulatory and macro-economic factors) and is not justified or effective in accordance with paragraph 36 b) and c) of the NPPF.	<i>The Council recognises that housing delivery can be affected by factors beyond developer control, including policy changes, regulatory requirements, and economic conditions. The Plan will balance the need to incentivise timely delivery with recognition of external constraints. Any delivery mechanisms will be justified through evidence and tested for effectiveness in accordance with the provisions of the NPPF (including paragraphs 35 and 36), ensuring they are positively prepared, justified, effective and consistent with national policy.</i>
Delivery & Monitoring	Delivery	Supportive for more triggers and thresholds in policy to ensure the timely delivery of infrastructure alongside housing to meet the needs of new communities and maintain existing services	<i>The Council supports the principle of linking infrastructure delivery to housing development to ensure new communities have access to necessary services and existing services are not overburdened. The Plan will set out requirements for infrastructure delivery through allocation policies and a comprehensive Infrastructure Delivery Plan, secured through planning conditions and Section 106 obligations where appropriate.</i>
Delivery & Monitoring	Delivery	Recommendation for Hertsmere to utilise Completion Notices under Section 94 of the Town and Country Planning Act 1990 for stalled sites to incentivise development and prevent land banking.	<i>The Council notes the suggestion to use Completion Notices under Section 94 of the Town and Country Planning Act 1990. While this is a statutory power available to the Council, its use would be considered on a case-by-case basis where sites have stalled without justifiable reasons. The Plan focuses on developing a robust housing trajectory and delivery mechanisms that encourage rather than penalise development, while maintaining flexibility to address non-delivery where necessary.</i>
Delivery & Monitoring	Delivery	Recommendation for Hertsmere to use Grampian conditions and Section 106 obligations to ensure housing delivery is stalled until key infrastructure milestones are met.	<i>The Council acknowledges the recommendation to use Grampian conditions and Section 106 obligations to ensure infrastructure is delivered alongside housing. The Plan will set out infrastructure requirements through allocation policies and the Infrastructure Delivery Plan. Planning obligations and conditions will be used where necessary to secure timely delivery of infrastructure in accordance with national policy and guidance, ensuring development is supported by adequate services and facilities.</i>

Theme	Sub-Theme / Issue	Summary	Response
Delivery & Monitoring	Delivery	Concern that the Council lacks resourcing capacity to work effectively with stakeholders to deliver the Local Plan.	<i>The Council recognises that effective plan delivery requires adequate resources, skilled staff, robust governance arrangements, and proactive engagement with infrastructure providers, developers, statutory consultees, and communities to coordinate development, secure necessary infrastructure, and monitor implementation. The Council is committed to ensuring that adequate resources and capacity are in place to deliver the Local Plan effectively, including maintaining appropriately skilled planning and infrastructure teams, establishing effective governance and partnership arrangements with Hertfordshire County Council and other key delivery partners, utilising planning performance agreements and developer contributions where appropriate to resource complex applications, and monitoring plan delivery through the Authority Monitoring Report to identify issues and respond proactively.</i>
Delivery & Monitoring	Delivery	Concern that sufficient consideration has not been given to long-term custodianship and stewardship	<i>The Council recognises the importance of long-term custodianship and stewardship in new developments and will seek to ensure that where necessary, for types of land uses that require ongoing management and maintenance, this is secured through appropriate management plans, planning obligations and conditions at the planning application stage.</i>
Delivery & Monitoring	Monitoring	Recommendation that the Plan's monitoring policy should include indicators for monitoring of ancient woodland affected by allocations, ancient/veteran trees recorded and protected, canopy cover change, trees lost and replaced, BNG delivery, LNRS priority delivery, access to natural greenspace, green infrastructure delivery and long-term management compliance or similar indicators so that delivery against policies related to these matters can be tested over time.	The Regulation 19 Local Plan includes a monitoring framework under Policy DM7. Environmental indicators include designated biodiversity sites, Biodiversity Net Gain, urban greening and recreational and open-space provision.
Delivery & Monitoring	Monitoring	Monitoring should include up to date monitoring of housing land supply.	<i>A five-year housing land supply report is published annually by HBC and sets out the up-to-date deliverable housing land supply position for the borough.</i>
Design	Accessible design	Supports the requirements for M4 (2) and M4 (3) requirements in the Local Plan.	<i>The Council welcomes support for accessible and adaptable housing. Policy HQD2 of the Regulation 19 Local Plan requires at least 10 per cent of new dwellings to meet Building Regulation M4(3), with the remaining dwellings meeting M4(2).</i>
Design	Accessible design	Concern that plan has not adequately considered alternative methods of transport for the elderly, especially those with ill health or disabilities, such as dedicated bus services or disabled parking within development proposals.	<i>The Council recognises the importance of ensuring development is accessible for elderly residents and those with disabilities or health conditions. The Plan will include policies requiring major developments to consider accessibility by different transport modes, including provision for dedicated bus services, accessible public transport connections, and appropriate disabled parking provision. This aligns with the NPPF requirement to create inclusive places that are safe, healthy and pleasant for all users.</i>

Theme	Sub-Theme / Issue	Summary	Response
Design	Building heights	Concern over height of development proposed, including impact on local character and/or heritage assets	<i>Same as response to "Concern over density of development proposed, including impact on local character". In addition: The Local Plan will include maps that identify the most appropriate locations for new tall buildings. This will take account of the spatial strategy's approach towards urban regeneration; the availability of sites; the capacity of infrastructure networks; accessibility to sustainable travel networks; and the ability for the surrounding townscape to accommodate this form of intensification in terms of impact on its character and appearance.</i>
Design	Building heights	Concern over proposed approach to building heights / tall buildings	<i>Local Plan policies on building height will identify appropriate locations for tall buildings, as well as associated definitions and design parameters. The purpose is to optimise capacity of suitable, available, and deliverable locations for growth, taking account of need for regeneration, capacity of infrastructure, and impact on local character.</i>
Design	Building heights	Support for proposed approach to building heights / tall buildings	<i>Same as response to "Concern over proposed approach to building heights / tall buildings"</i>
Design	Building heights	For development sites where deep piled foundations are proposed a Foundation Works Risk Assessment (FWRA) will be required to ensure that the risks to groundwater are understood and mitigated.	<i>The Regulation 19 Local Plan protects groundwater through Policies GI5 and SD9, including Source Protection Zones, and requires proportionate assessment and mitigation where development could adversely affect groundwater or ground conditions.</i>
Design	Building heights	Policy on building heights should not impose rigid height parameters for sites, but identify broad areas where tall buildings would be acceptable	<i>Local Plan policies on building height are intended to identify appropriate locations as well as set associated design parameters including maximum heights. Inclusion of maximum heights is deemed necessary to safeguard local character and appearance.</i>
Design	Building heights	Development of or exceeding 45.7m in height above ground level will trigger statutory consultation requirement with the MOD.	<i>Sites located within existing safeguarding areas for active airfields and commercial airports will be required to consult the relevant body for any development proposals. This will be set out in a safeguarding areas policy.</i>
Design	Character	Concern over impact of development on local character	<i>Local Plan design policies will require development proposals to respect local character while using land supply resources effectively and efficiently to accommodate growth required to address identified need for new homes and jobs.</i>
Design	Co-location/mixed-use	Concern over the approach taken to change of use applications and promotion of a more flexible approach to permissions for change of use, allowing residential uses in industrial areas, and vice versa.	<i>The Plan will set out clear policies on change of use and mixed-use development, balancing the need for flexibility with protection of employment land and residential amenity. In line with the NPPF, policies will support appropriate mixed-use development while ensuring industrial areas remain viable for employment uses and residential areas maintain acceptable living conditions. Any flexible approach will be based on evidence of need and local circumstances.</i>

Theme	Sub-Theme / Issue	Summary	Response
Design	Density/Capacity	Concern over density of development proposed, including impact on local character	<i>Proposals will be expected to respect the prevailing character of the local area while using limited land supply resources as effectively and efficiently as possible. HBC's aim is to optimise site capacity, particularly of sites located on previously development land and within built up areas, as well as sites with access to public transport and other infrastructure. The aim is to meet as much development need as possible within settlements and in well serviced locations. This is more sustainable, reducing the need to travel and supports the ongoing viability and vitality of settlements and their services. It also aims to minimise the need to release high-quality greenfield land for housing.</i>
Design	Density/Capacity	Support for proposed approach to optimising site capacity	<i>Same as response to "Concern over density of development proposed, including impact on local character"</i>
Design	Density/Capacity	Concern over densification through infill, including impact on local character and/or loss of green/ open space	<i>Same as response to "Concern over density of development proposed, including impact on local character". In addition: In line with the National Planning Policy Framework, development should not result in the loss of existing open space used for sports, recreation, play, or allotments, unless an assessment clearly shows they are surplus to requirement or the loss can be compensated through new provision. Extensions or alterations to existing dwellings will be expected to make a neutral or positive contribution to the surrounding area, and overbearing development will be resisted. The policy will also protect residential gardens from overdevelopment.</i>
Design	Density/Capacity	Concern over lack of density of development proposed, and resultant lower delivery of housing to meet need	<i>Same as response to "Concern over density of development proposed, including impact on local character"</i>
Design	Design Quality	Support for promotion of high-quality design in new development	<i>HBC seeks to secure high-quality design for new residential developments in the Borough. It will ensure that all new housing is designed to a high-quality standard, responding to the needs of Hertsmere's resident population.</i>
Design	Design Quality	Concern for/ opposition to proposed development approach due to potential to increase opportunities for crime where Secured by Design principles are not adequately integrated into the scheme	<i>Policies HQD1, HQD2 and HQD3 require development to create safe, inclusive and welcoming places through measures including natural surveillance, appropriate lighting, active frontages and clear relationships between public, communal and private space.</i>
Design	Design Quality	Concern for/ opposition to proposed approach to high-quality design of new development	<i>Same as response to "Support for promotion of high-quality design in new development"</i>

Theme	Sub-Theme / Issue	Summary	Response
Design	Design Quality	Concern over volume house builders delivering homes on large sites which lack design quality and will not contribute to the character of Hertsmere	<i>The Council seeks to secure high-quality design for all new residential development in the Borough, regardless of site size or developer. The Plan will include robust design policies, supported by design codes where appropriate, to ensure all development contributes positively to local character. Design quality will be secured through pre-application engagement, design review panels where appropriate, and robust use of planning conditions and obligations.</i>
Design	Design Quality	Support for the use of design tools/mechanisms to secure high-quality design, such as design codes in Neighbourhood Plans, design review panels and design-led masterplanning, robust use of conditions and obligations, and ongoing monitoring of design and public-realm.	<i>The Council welcomes support for design tools and mechanisms to secure high-quality design. The Plan will promote the use of design codes in Neighbourhood Plans, design-led masterplanning for larger sites, and design review panels for major or sensitive schemes. Conditions and obligations will be used to secure design commitments, and monitoring arrangements will track delivery of design quality and public realm improvements.</i>
Design	Design Quality	Concern about past record / success of applying design codes and securing high-quality design	<i>The Council is committed to learning from past experience and strengthening design policy delivery. The Plan includes robust design policies that will be supported by updated design guidance, enhanced pre-application engagement, and where appropriate, design review processes. The Council will work with applicants and the community to ensure high-quality design outcomes are achieved in practice, backed by effective monitoring and enforcement.</i>
Design	Design Quality	Recommendation that development should be designed to encourage physical activity. Policy HQD1 should expect developments to consider how Active Design principles referenced in the Social and Community Infrastructure chapter (paragraph 8.3.9) of the plan would help ensure that design that supports physical activity is embedded.	<i>The Council recognises the importance of design that supports active, healthy lifestyles. Policy HQD1 will be strengthened to require development to consider how Active Design principles support physical activity. This includes designing streets and spaces that encourage walking and cycling, providing accessible green spaces and play areas, and creating connected routes to local facilities, in line with NPPF paragraph 96 and Sport England's Uniting the Movement Strategy.</i>
Design	Design Quality	Recommendation for Policies HQD2 and HQD3 to consider how Active Design principles relating to 'activity for all', 'providing connected active travel routes', 'a network of multi-functional open spaces' and 'high-quality streets and spaces' could be applied, to align with Sport England's Uniting the Movement Strategy and NPPF (para. 96).	<i>The Council welcomes the recommendation to integrate Active Design principles into design policies. Policies HQD2 and HQD3 will be reviewed to ensure they address 'activity for all', provide connected active travel routes, support a network of multi-functional open spaces, and promote high-quality streets and spaces. This aligns with the NPPF's emphasis on healthy, inclusive communities and Sport England's strategic priorities.</i>
Design	Design Quality	Support for high-quality design that respects local character and identity.	<i>The Council welcomes support expressed for and seeks to secure high-quality design for all new residential development in the Borough through its Local Plan. The Plan will include robust design policies, supported by design codes where appropriate, to ensure all development contributes positively to local character. Design quality will be secured through pre-application engagement, design review panels where appropriate, and robust use of planning conditions and obligations.</i>

Theme	Sub-Theme / Issue	Summary	Response
Design	Design Quality	Support for integrating natural/green spaces into design, with a focus on Local Nature Recover Strategy (LNRS) enhancement measures.	<i>The Council recognises that integrating high-quality green infrastructure and nature-based solutions into development is essential to deliver biodiversity net gain, support climate change adaptation and mitigation, improve health and well-being, enhance landscape character, and contribute to nature recovery networks. The proposed Policy GI3 (Local Nature Recovery Strategy) will require development to contribute to nature recovery priorities identified in the Hertfordshire LNRS. Furthermore, the proposed Policy GI1 (Hertsmere's Green and Blue Infrastructure) would require development to protect, enhance, and extend green infrastructure networks, and to integrate multifunctional green and blue infrastructure. The Council is committed to ensuring that development integrates accessible, high-quality natural and green spaces designed to support LNRS enhancement measures including habitat creation and restoration, ecological connectivity, priority species and habitats, and climate resilience, delivering measurable environmental improvements and supporting nature recovery across Hertsmere.</i>
Design	Inclusive Design	Concern over / opposition to promotion of inclusive and welcoming design	<i>Inclusive and welcoming scheme design contributes to delivering inclusive, accessible, welcoming and secure environments in Hertsmere, addressing disproportionate barriers.</i>
Design	Inclusive Design	Support for promotion of inclusive and welcoming design	<i>Same as response to "Concern over / opposition to promotion of inclusive and welcoming design"</i>
Design	Public Realm	Concern over impact of development on public realm	<i>Local Plan policy will require that development proposals should seek to improve (and must not adversely impact on the effective functioning and safe use of the Borough's transport network and public realm, including connecting walking and cycling transport infrastructure.</i>
Design	Public Realm	Need for / support for delivery of high quality and well-connected public spaces	<i>Same as response to "Concern over impact of development on public realm"</i>
Design	Design Quality	Concern that development will negatively impact the character and heritage of the area	<i>The Council recognises that new development must be sympathetic to local character, history, and the surrounding built and natural environment, and that heritage assets, must be conserved and enhanced in a manner appropriate to their significance. The Regulation 19 Local Plan's overarching spatial strategy is set out principally through Policy HBF1 (Delivering a Better Future for Hertsmere), supported by the strategic policies contained throughout Parts 1 and 2 of the Plan, requiring high-quality design that respects and enhances local character, distinctiveness, and sense of place, on the conservation and enhancement of heritage assets (Policy HE1-HE34) requiring development to sustain and enhance the significance of heritage assets and their settings, and on landscape character (GI1) requiring development to respect landscape character and visual amenity. The Council will carefully consider all representations raising concerns about impacts on character and heritage and ensure that site allocation policies include robust design requirements and mitigation measures to protect and enhance character and heritage. The Regulation 19 Publication version of the Local Plan will include only those allocations that can be delivered without unacceptable harm to the character and heritage of Hertsmere's settlements, landscapes, and historic environment.</i>

Theme	Sub-Theme / Issue	Summary	Response
Economy & Culture	Commuting	Concerns about impact of proposed employment growth on local infrastructure from workers who are not also residents	<i>The Council recognises that employment growth will generate demand for infrastructure from workers who may not be local residents. The Plan will address this through the Infrastructure Delivery Plan, identifying capacity issues and mitigation requirements for transport, utilities, and social infrastructure. Appropriate developer contributions will be secured to ensure employment development is supported by necessary infrastructure improvements.</i>
Economy & Culture	Delivery	Concerns around how realistic the indicated delivery trajectory of proposed employment site(s) is	<i>The Council has prepared a development trajectory for housing and employment sites, based on evidence of market demand, site availability, and infrastructure capacity. The trajectory will be kept under review through annual monitoring, and where necessary, the Council will work with landowners and developers to address any barriers to delivery. The Plan includes flexibility to respond to changing economic circumstances while meeting identified employment needs.</i>
Economy & Culture	Employment land demand/supply	Recommendation to explore higher levels of growth at Bowmans Cross to deliver more employment land.	<i>The Council will determine the appropriate scale of development at Bowmans Cross based on evidence of employment land need, site capacity, infrastructure constraints, and environmental impacts. The Plan balances the need to meet employment land requirements with ensuring development is deliverable and sustainable. Any changes to proposed levels of growth would need to be justified through updated evidence and viability testing.</i>
Economy & Culture	Employment land demand/supply	Need for more industrial space.	<i>The Council recognises the need for industrial and warehousing space to support economic growth and employment. The Plan is informed by an Economic Study that assesses future employment land needs across different use classes. The Plan will allocate land for industrial uses in appropriate locations with good access to the strategic road network, subject to site availability and constraints, including in relation to environmental and infrastructure.</i>
Economy & Culture	Employment land demand/supply	Lots of empty offices in the Borough (suggesting there is no demand for more office stock).	<i>The Council acknowledges current vacancy rates in office stock. However, planning for employment land must take a long-term view over the plan period and allow for economic cycles and changing market conditions. The Economic Study considers vacancy rates alongside growth projections and structural changes in the economy. The Plan will provide flexibility to respond to changing demand while protecting viable employment sites. In some cases, vacancies reflect instances where current stock is in need of updating or no longer suitable for modern purposes.</i>
Economy & Culture	Employment land demand/supply	Approach to employment land is not consistent with National Policy	<i>The Council's approach to employment land is based on evidence of economic need and follows the methodology set out in national Planning Practice Guidance. The Plan will allocate sufficient employment land to meet identified needs, support a prosperous rural economy, and allow for flexibility to respond to changing circumstances, in full accordance with NPPF Chapter 6 on building a strong, competitive economy.</i>
Economy & Culture	Employment land demand/supply	Support for the local film, television and creative sectors	<i>The Council welcomes support for Hertsmere's important film, television and creative sectors. The Plan recognises these sectors as key strengths of the local economy and will include policies that support their continued growth, including protecting existing studio facilities, supporting appropriate expansion where this can be accommodated sustainably and supporting the development of their supply chain.</i>

Theme	Sub-Theme / Issue	Summary	Response
Economy & Culture	Employment land demand/supply	Concern that further clarity needs to be provided for the quantum of film studio and data centre floorspace that is required across the Plan Period.	<i>The Council will provide clear evidence of the quantum of film studio and data centre floorspace required over the plan period in the Economic Study and supporting evidence base. This will inform employment land allocations and ensure the Plan provides sufficient land in appropriate locations to meet identified needs in these specialist sectors.</i>
Economy & Culture	Employment land demand/supply	Need for more accommodation for smaller businesses.	<i>The Council recognises the importance of providing accommodation for smaller businesses and start-ups. The Plan will include policies that support the provision of flexible employment space, including small business units and co-working spaces, particularly in town centres and mixed-use schemes. This supports economic diversity and provides opportunities for business growth in line with NPPF requirements.</i>
Economy & Culture	Employment land demand/supply	Concern over potential job losses and increased journey times from the loss of supermarkets in Borehamwood.	<i>The Council recognises the importance of protecting retail employment and convenient access to shops and services. The Plan will include policies on town centre uses and loss of retail facilities, requiring evidence that they are genuinely surplus to requirements before allowing alternative uses. Any loss would need to be justified and, where appropriate, mitigated through replacement provision or contributions to sustainable transport improvements. For clarity, the candidate sites in question have all sought the re-provision of existing food and retail uses on site.</i>
Economy & Culture	Employment land hierarchy	Rural Employment Areas are not clear in the plan.	<i>The Council will ensure the Plan clearly identifies and defines Rural Employment Areas on the Policies Map, supported by policy criteria that protect and support rural employment uses. This will provide clarity for decision-making and support a prosperous rural economy in accordance with NPPF paragraph 88.</i>
Economy & Culture	Freight	Concerns about capacity of freight infrastructure to accommodate proposed employment growth	<i>The Council recognises that employment growth, particularly in industrial and logistics sectors, can generate significant freight movements. The Plan will address freight infrastructure capacity through the Transport Study and Infrastructure Delivery Plan, identifying mitigation requirements and working with the Highway Authority and National Highways to ensure the transport network can safely accommodate forecast freight traffic.</i>
Economy & Culture	Rural employment	There is not sufficient support for the rural economy and in particular rural diversification.	<i>The Council is committed to supporting a prosperous rural economy in line with NPPF Chapter 6. The Plan will include policies that support appropriate rural economic development, including farm diversification, rural tourism, equestrian businesses, and conversion of rural buildings for employment or community uses, subject to environmental and amenity safeguards.</i>
Economy & Culture	Sector priorities	Equestrian uses need to feature more heavily in the Plan	<i>The Council recognises that equestrian uses are an important part of Hertsmere's rural economy and character. The Plan will include supportive policies for equestrian development where this is compatible with Green Belt purposes, environmental protection, and residential amenity, in line with national policy on supporting a prosperous rural economy.</i>

Theme	Sub-Theme / Issue	Summary	Response
Economy & Culture	Sector priorities	Investment should be focused on the knowledge-based economy.	<i>The Council recognises the importance of the knowledge-based economy as a driver of economic growth. The Plan will support development that provides modern, high-quality employment space suitable for knowledge-based sectors, including offices, research and development facilities, and flexible workspaces. This will be balanced with provision for other employment sectors to ensure a diverse and resilient local economy.</i>
Economy & Culture	Sector priorities	Recommendation for the Council to have greater regard to planning for higher education, laboratories and scientific facilities as potential drivers for skills as well as economic growth	<i>The Council recognises that higher education, laboratories and scientific facilities can drive skills development and economic growth. The Plan will support proposals for such facilities where they meet identified needs and can be accommodated sustainably, in line with NPPF requirements to support innovation and the knowledge-based economy.</i>
Economy & Culture	Sector priorities	Concern for the declining film industry and the impacts of AI.	<i>The Council notes opinions about structural changes in the film industry. The Plan takes a long-term view of employment land needs and will provide flexibility to allow economic sectors to adapt to technological change. Policies will support the film and creative sectors while allowing for evolution of uses and business models over the plan period.</i>
Economy & Culture	Sector priorities	Concern over the environmental impacts of data centres and their lack of employment opportunities once constructed.	<i>The Regulation 19 Local Plan identifies a need for up to 10.8 hectares of land for data centres. Proposals are addressed through the employment, digital connectivity, sustainable design and environmental policies of the Plan, together with relevant site-allocation requirements.</i>
Economy & Culture	Sector priorities	Concern over lack of support for construction sector	<i>The Council recognises the important role of the construction sector in the local economy. The Local Plan will include strategic policies on economic development and employment land requiring the retention and intensification of existing employment sites and supporting the delivery of new high-quality employment development, including through employment site allocations. This will help ensure the retention, provision and emplacement of employment sites, premises, and infrastructure suitable for construction sector businesses. Major development proposals will also be required to demonstrate support for local employment, skills, and supply chains, for example through measures including employment and skills plans and local procurement of materials and services where practicable and competitive.</i>
Economy & Culture	Town centres	Need to recognise changes in shopping patterns, in particular the increase in internet shopping.	<i>The Council recognises that shopping patterns have changed significantly, with growth in online shopping affecting high street retail. The Plan responds to these changes by promoting diverse town centre uses, supporting meanwhile uses, and focusing retail policies on maintaining town centre vitality and viability rather than solely protecting retail floorspace. This flexible approach is consistent with NPPF Chapter 7.</i>
Economy & Culture	Town centres	Need for more diversity in the range and quality of shops in the Borough.	<i>The Council shares the aspiration for diverse, quality retail provision. The Plan will support town centre regeneration and encourage a mix of uses including independent retailers, cafes, restaurants, cultural and community facilities. Planning policies will create the framework for vibrant town centres, while market forces and business decisions will determine the specific mix of occupiers.</i>

Theme	Sub-Theme / Issue	Summary	Response
Economy & Culture	Town centres	Concern that the reduction in car parking within town centres through the development of car parks will impact traders in the town centre.	<i>The Council recognises that town centre car parking supports access for shoppers and traders. Any reduction in car parking provision will be balanced against the need to optimise development potential, improve sustainable transport access, and regenerate town centres. The Plan will require transport assessments to demonstrate that development proposals maintain adequate parking provision while prioritising sustainable travel modes, in line with NPPF paragraph 109.</i>
Economy & Culture	Town centres	Recommends that town centre sites are not just considered on housing numbers but also the continued use of retail, employment, parking, public services and community infrastructure.	<i>The Council agrees that town centre development should deliver a balance of uses that support vitality and viability. Site allocation policies for town centre sites will set out requirements for mixed-use development including retail, employment, community facilities, and appropriate parking provision, alongside housing. This approach aligns with NPPF Chapter 7 on ensuring the vitality of town centres.</i>
Economy & Culture	Training	N/A	N/A
Economy & Culture	Sector priorities	Recommendation that the plan makes more reference to rail as a mode of passenger and freight transport, and that it draws on the economic benefits rail connections can bring	The proposed Spatial Strategy considers the Borough's existing infrastructure networks, including access to rail (alongside settlement hierarchy and capacity to accommodate growth). It envisages that most growth, specifically during the first five-years of the plan period will be distributed to the Borough's two higher order settlements of Borehamwood and Potters Bar, making use of sustainable transport connections, including rail, in order to draw on economic benefits and support growth. Policy TR1 (Sustainable Transport and Movement) will be a strategic policy that sets out the Local Plan's overarching approach towards securing transport networks that support successful and sustainable place-making. It will focus upon locating future growth within places that already have good access to travel networks; making the most efficient use of land supply at those locations and will require that development proposals should seek to improve and must not adversely impact on the effective functioning and safe use of the Borough's transport network and public realm. The Council is aware that Hertsmere benefits from strong rail connectivity and will ensure that Policy TR1 and other related policies appropriately recognise and leverage Hertsmere's strategic rail connectivity as a key asset supporting sustainable growth, economic prosperity, low-carbon transport, and high-quality, accessible, and inclusive communities.
Economy & Culture	Employment land demand/supply	The plan should identify specific sites in Potters Bar for larger-format retail and commercial leisure, including hotel and sports/entertainment provision that is currently absent and to reduce the need for residents to travel to Borehamwood, St Albans and London	<i>The Council has prepared a Retail and Town Centres Study as part of the evidence base for the Draft Local Plan, which assesses the capacity and need for additional retail and leisure floorspace across the borough's centres, evaluates the health and vitality of town centres, and provides recommendations for town centre policies and site allocations to support their future vitality, viability and role in serving local communities. The Council will review representations received during Regulation 18 consultation alongside the retail and town centres evidence base to identify if any further allocation is required to meet needs.</i>

Theme	Sub-Theme / Issue	Summary	Response
Employment sites	Freight	Concerns about capacity of transport infrastructure to accommodate commuting to proposed employment sites	<i>The Council has assessed transport impacts of proposed employment sites through the Transport Study. Site allocation policies will include requirements for transport assessments and travel plans, and where necessary, developer contributions towards highway improvements and public transport enhancements to mitigate impacts. The Council will work with the Highway Authority to ensure the transport network can accommodate development without unacceptable impacts on safety or congestion.</i>
Employment sites	General opinion/view	General concern about proposed employment site(s)	<i>The Council has assessed all proposed employment sites through the Housing and Employment Land Availability Assessment, Economic Study, Sustainability Appraisal, and site-specific technical assessments. Site selection is based on evidence of employment land need, accessibility, environmental constraints, and deliverability. All concerns raised will be considered in finalising site allocations for the Regulation 19 Plan.</i>
Employment sites	General opinion/view	General support for proposed employment site(s)	<i>The Council welcomes support for proposed employment site allocations, which are informed by evidence of employment land need and will contribute to the Borough's economic growth and job creation.</i>
Employment sites	General opinion/view	Support for a policy approach that is consistent with the NPPF policy on data centres and seeks to identify appropriate locations for data centres in the Local Plan	<i>The Council will provide clear evidence of the quantum of data centre floorspace required over the plan period in the Economic Study and supporting evidence base. This will inform employment land allocations and ensure the Plan provides sufficient land in appropriate locations to meet identified needs in these specialist sectors.</i>
Employment sites	General opinion/view	Concern that employment sites do not appear to align with the spatial strategy	<i>The Council's spatial strategy seeks to deliver employment land in sustainable locations that support economic growth while minimising environmental impacts. Employment site allocations are informed by the Economic Study, Transport Study, and evidence of site deliverability. The Plan balances employment land provision with the need to direct development to accessible locations in accordance with the NPPF.</i>
Environment	Best and most versatile agricultural land (BMV)	Concerns over the loss of best and most versatile agricultural land and its impact on food security	<i>The Council recognises the importance of protecting best and most versatile agricultural land for food production. The Plan follows the approach set out in NPPF paragraph 180, which requires significant development of agricultural land to use areas of poorer quality (Grades 3b, 4 and 5) in preference to higher quality land. Where development of BMV land is necessary to meet identified needs, this will be justified through evidence, and the Plan will seek to minimise such loss where possible.</i>
Environment	Best and most versatile agricultural land (BMV)	Support for development proposals that avoid best and most versatile agricultural land (BMV)	<i>The Council welcomes support for protecting BMV agricultural land. The Plan prioritises development on previously developed land and lower quality agricultural land where possible, consistent with national policy on conserving and enhancing the natural environment.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Climate change	Concerns about the impact of proposed growth on air quality due to increased traffic volumes	<i>The Council recognises that development can impact air quality through increased traffic generation. The Plan is supported by an Air Quality Assessment that identifies constraints and mitigation requirements. Development will be required to incorporate measures to minimise air pollution, including sustainable transport provision, electric vehicle charging infrastructure, travel plans, and green infrastructure. Development affecting Air Quality Management Areas will require air quality assessments to demonstrate no unacceptable impacts on human health.</i>
Environment	Climate change	Concerns about the impact of proposed growth in terms of causing or worsening climate change effects, including more flooding due to removing permeable green spaces, urban heat island effect due to densification etc	<i>The Council is committed to addressing climate change through the Local Plan. Policies will require development to incorporate measures to reduce carbon emissions, manage flood risk through sustainable drainage systems, provide green infrastructure to manage urban cooling, and protect/enhance green spaces. The Plan's climate change policies are designed to ensure development contributes to climate change mitigation and adaptation in accordance with NPPF Chapter 14.</i>
Environment	Climate change	General opposition to / concern about development due to perceived difficulty in supporting growth with climate mitigation in practice	<i>The Council acknowledges concerns about achieving climate change mitigation alongside growth. The Plan includes robust climate change policies requiring sustainable design, renewable energy generation, sustainable drainage, and green infrastructure. These requirements are informed by viability testing to ensure they can be delivered in practice. The Council will monitor policy effectiveness and take corrective action where necessary to ensure climate objectives are achieved.</i>
Environment	Climate change	Concern about proposed energy standards for new development going beyond those required in Building Regulations, contrary to draft NPPF 2025 policy PM13	<i>The Council will ensure that energy efficiency requirements in the Local Plan are consistent with national policy and Building Regulations. The Plan will be reviewed to align with the final version of the NPPF 2025 and will not set energy efficiency standards that exceed Building Regulations requirements unless justified by local circumstances and supported by evidence, in accordance with national policy.</i>
Environment	Climate change	Support for proposed climate change policies	<i>The Council welcomes support for the Plan's climate change policies, which seek to deliver sustainable development that minimises carbon emissions, manages flood risk, and enhances resilience to climate change.</i>
Environment	Climate change	Recommendation that policies on sustainable development recognise importance of location and design of new development	<i>The Council agrees that location and design are fundamental to delivering sustainable development. The Plan's spatial strategy prioritises development in accessible locations served by sustainable transport, and design policies require high-quality, energy-efficient design that responds to local context. This approach is consistent with the NPPF's definition of sustainable development.</i>
Environment	Climate change	Concern over LETI standards in policy SD2 for sustainable design, as setting very high (Passivhaus) standard which could impact viability and should be tested; as potentially not possible to implement due to commercial or technical constraints, which should be recognised in policy; and as contradicting First Homes Standard in SD4.	<i>The Council has tested the policies in the Local Plan through viability assessment work and will publish a Whole Plan and CIL Viability Assessment at Regulation 19 stage. Policy SD2 sets out a criteria-based approach that recognises site specific circumstances and requires sustainable design measures to be implemented where viable and appropriate, acknowledging that commercial or technical constraints may apply. The policy supports national policy on First Homes and does not conflict with the requirements in Policy SD4.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Climate change	Recommendation that BREEAM is excluded from policy SD2 for buildings under 1,000m ² (not 500m ² as suggested) and that applicants be allowed to present an alternative approach where practical and viable.	<i>Policy SD2 includes flexibility for applicants to demonstrate alternative approaches where this can be justified on viability or practical grounds through the submission of supporting evidence.</i>
Environment	Climate change	Recommendation to include direct reference to Natural England's Green Infrastructure Framework in Policy SD1, as well as to add recognition of role Green Infrastructure has in strengthening climate change resilience to climate change chapter. Policies should further set out appropriate nature-based solutions for climate mitigation and adaptation, such as woodland or wetland creation or peatland restoration.	<i>The Council recognises the crucial role that green infrastructure plays in mitigating and adapting to climate change and will seek to make reference to useful tools that can aid applicants in complying with Policy SD1. Through the policy applicants will be required to outline how proposals seek to strengthen climate resilience in Hertsmere through the preparation of a sustainability statement. While not all natural-base mitigation, such as peat land restoration, will be relevant to Hertsmere, the Council will seek to outline the relevant habitat restoration which will be the most effective across the Borough.</i>
Environment	Climate change	To avoid duplication with national policy, policy SD3 should focus solely on encouraging overheating measures in green and public open spaces and refer to Part O of Building Regulations as the mechanism for addressing overheating in all buildings.	<i>The Council recognises that overheating in buildings is addressed through Part O of the Building Regulations 2010 (as amended) and that planning policies should avoid duplicating requirements set out in other regulatory regimes. The Council will consider whether Policy SD3 should be refocused to emphasise site-wide measures including green infrastructure, urban greening, tree planting, water features, and design of public open spaces to provide cooling and shading, whilst clearly referencing Part O of the Building Regulations as the mechanism for addressing overheating within buildings</i>
Environment	Climate change	Concern over requirement for embodied carbon assessments, due to their cost, and recommendation that policy should only require assessment for a 'representative sample of the buildings' and only where proportionate to stage and complexity of the application.	<i>The Council recognises that reducing embodied carbon from construction materials and processes is essential to achieving net zero carbon emissions and that embodied carbon assessments provide valuable evidence to inform material choices and construction methods but also acknowledges the need to ensure that policy requirements are proportionate, do not impose unreasonable costs, and are appropriate to the scale and nature of development. The Council will ensure that a proportionate approach is taken and will consider the request to amend the policy wording to clarify this.</i>
Environment	Climate change	Support for requirement for new development to contribute to generation of renewable energy and use of heat networks	<i>The Council welcomes support for renewable energy generation and heat networks. Policy SD6 will promote low-carbon heating solutions including heat networks where viable, and renewable energy generation on development sites to reduce reliance on grid electricity and contribute to achieving net zero carbon emissions.</i>
Environment	Climate change	Recommendation that emphasis of policy SD6 is changed from 'prioritising' heat networks to the 'consideration' of such systems where 'practical and viable and where they would result in lower carbon emissions than use of individual heat pumps.	<i>The Council will review the wording of Policy SD6 to ensure it provides appropriate flexibility, requiring consideration of heat networks where practical and viable, while recognising that individual heat pumps may be more appropriate in some circumstances. The policy will be informed by evidence of technical feasibility, viability, and carbon emissions performance.</i>
Environment	Climate change	Recommendation for the Plan to recognise the significant positive contribution that new development can make to providing balance and resilience to the national grid through the generation of renewable energy on site and resulting reduction in quantum of power required from the national grid.	<i>The Council recognises that on-site renewable energy generation can contribute to grid resilience and reduce pressure on the national grid infrastructure. The Plan will include policies encouraging renewable energy generation on development sites where technically feasible and viable, contributing to both local energy security and national decarbonisation objectives.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Climate change	Support for 110 litres per person per day water efficiency target	<i>The Council welcomes support for the 110 litres per person per day water efficiency standard, which will help conserve water resources in a water-stressed area, consistent with national policy and Building Regulations optional standards.</i>
Environment	Climate change	Support for circular economy principles	<i>The Council welcomes support for circular economy principles. The Plan will include policies promoting resource efficiency, waste minimisation, and circular economy approaches in development, supporting the transition to a more sustainable, low-carbon economy.</i>
Environment	Climate change	Support for Policy SD4, carbon neutral development and financial contributions where on-site carbon mitigation requirements cannot be met.	<i>The Council welcomes support for Policy SD4 on achieving carbon neutral development. Where on-site measures cannot fully achieve carbon neutrality, financial contributions will be secured to fund off-site carbon reduction projects, ensuring all development contributes to achieving net zero carbon emissions.</i>
Environment	Climate change	Recommendation that suitable flexibility is incorporated into this policy to recognise the challenges to achieving a net-zero waste target, on the basis that there are some construction waste streams that cannot be recycled.	<i>The Council recognises that achieving net-zero construction waste may not be feasible for all waste streams. The policy will be amended to provide flexibility, requiring developments to minimise construction waste and maximise recycling where technically feasible, while acknowledging that some waste streams cannot currently be recycled. The policy will encourage innovation in waste management and circular economy approaches.</i>
Environment	Climate change	Suggestion of adding a reference to the designated Watling Chase Community Forest and requirement for the provision of significant tree planting to policy, in light of the Climate Emergency.	<i>The Council will consider adding reference to Watling Chase Community Forest in climate change and green infrastructure policies, recognising its role in carbon sequestration, biodiversity, and climate change adaptation. Policies will promote tree planting as part of green infrastructure provision to contribute to the Community Forest and support climate change mitigation.</i>
Environment	Climate change	Recommendation to strengthen wording of Policy SD8 to provide greater clarity on requirements for water efficiency standards and addition of requirement for commercial development to meet BREEAM 'excellent' rating for water efficiency.	<i>The Council will review Policy SD8 to provide clearer requirements for water efficiency standards for residential and non-residential development. The requirement for commercial development to meet BREEAM 'excellent' rating for water efficiency will be considered, subject to viability testing and alignment with national standards.</i>
Environment	Climate change	Recommendation for addition to policy to require water efficiency standards in any refurbishments and / or changes of use in existing building stock.	<i>The Council recognises the importance of improving water efficiency in existing buildings. The Plan will consider including requirements for water efficiency measures in refurbishment and change of use proposals, where reasonable and proportionate, to contribute to overall water conservation objectives.</i>
Environment	Climate change	Recommendation for Policy SD2 and SD4 to be updated to reflect the contribution that water efficiency can make to reducing carbon and Co2 emissions.	<i>The Council will review Policies SD2 and SD4 to explicitly recognise the contribution of water efficiency to reducing carbon emissions through reduced energy consumption for water heating and treatment. This will provide a more integrated approach to sustainability and climate change mitigation.</i>
Environment	Climate change	Recommendation that sustainable design statement policy should require applicants to explain how tree retention, green infrastructure, urban greening and ecological networks have informed scheme design from outset.	<i>The Council agrees that environmental assets should inform design from the outset. Sustainable Design Statement requirements will be strengthened to require applicants to demonstrate how tree retention, green infrastructure, urban greening, and ecological networks have shaped scheme layout, design, and landscaping, ensuring these matters are embedded in the design process rather than added retrospectively.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Climate change	Expectation for the Plan to address water quality impacts and flood risk management in Policy SD7, in line with NPPF, with reference to River Basin Management Plan. Plans should positively contribute to reducing flood risk by working with natural processes and where possible use Green Infrastructure policies and the provision of SUDs to achieve this.	<i>The Council agrees that the Plan should address water quality impacts and flood risk management in line with national policy. The regulation 19 draft Local Plan will seek to provide clarity on how the applicants will be expected to reduce flood risk through implementing the measures set out in River Basin Management Plans and linking flood risk management to GI and SDS policy.</i>
Environment	Climate change	Recommendation of inclusion of environmental capacity as factor when assessing proposal in Policy SD8; stronger wording around mitigation prior to availability of adequate capacity and/or infrastructure; requirements for improvements to be in place before first occupation; and reference to the Shared Standards for Water Efficiency in Local Plans.	<i>The Council agrees that environmental capacity should be a factor when assessing proposals and mitigation measures are key to ensuring that adequate infrastructure capacity is available to deal with new development. The Council will review the policy wording and take into consideration the recommendations. The Council consider that appropriately worded conditions on planning permissions are determined by the decision maker and should be made on a case-by-case basis.</i>
Environment	Climate change	Recommendation that the Plan's sustainable design policies should support its GI policies by giving greater weight to canopy cover, sustainable drainage, natural flood management, urban cooling and nature-based solutions.	<i>The Council will ensure that sustainable design policies are fully integrated with green infrastructure policies, giving appropriate weight to canopy cover, sustainable drainage, natural flood management, urban cooling, and nature-based solutions. This integrated approach will ensure development delivers multiple environmental benefits and contributes to climate change adaptation and mitigation.</i>
Environment	Designated Sites	Concern about the lack of reference to designated sites and particular protected habitats that are specific to Hertsmere.	<i>The Council will ensure that the Plan includes comprehensive references to designated sites and protected habitats specific to Hertsmere, including Local Wildlife Sites, Local Nature Reserves, and habitats of principal importance. Policies will provide clear protection for these sites and require appropriate assessments where development may affect them, in accordance with national policy and biodiversity legislation.</i>
Environment	Designated Sites	Request for increased level of evidence for the sites located within or adjacent to designated sites (local/national)	<i>The Council will ensure that site allocations located within or adjacent to designated sites are supported by appropriate ecological assessments and evidence demonstrating that development can be accommodated without unacceptable harm to designated features. Site-specific policies will include mitigation requirements informed by this evidence, in accordance with the mitigation hierarchy.</i>
Environment	Designated Sites	Concern about methodology and conclusions of Habitats Regulation Assessment (HRA)	<i>The HRA for the Draft Local Plan has been prepared by independent ecological consultants using established methodology and in consultation with Natural England as the statutory nature conservation body, assessing potential impacts including atmospheric pollution, recreational disturbance, water quality and quantity, and urbanisation effects on European sites within and beyond the borough boundary. The Council welcomes constructive feedback on the HRA methodology and conclusions, will carefully consider all representations received during the Regulation 18 consultation, and will work with Natural England and ecological specialists to address any issues identified, ensuring that the HRA is robust, appropriately evidenced, and demonstrates that the Local Plan will not adversely affect the integrity of European protected sites across Hertsmere and the wider area.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Designated Sites	Support for certain conclusions of the Habitats Regulation Assessment (HRA)	<i>The HRA for the Draft Local Plan has been prepared by independent ecological consultants using established methodology and in consultation with Natural England as the statutory nature conservation body, assessing potential impacts including atmospheric pollution, recreational disturbance, water quality and quantity, and urbanisation effects on European sites, and concluding that with appropriate mitigation measures embedded within Local Plan policies, the plan will not adversely affect the integrity of European protected sites. The Council is pleased that certain HRA conclusions are supported and is committed to implementing the mitigation measures identified in the HRA, monitoring their effectiveness, and working with Natural England and other partners to ensure the protection and enhancement of European protected sites across Hertsmere and the wider area.</i>
Environment	Designated Sites	General support for the methodology and approach to the Sustainability Appraisal	<i>The SA for the Draft Local Plan has been prepared iteratively throughout plan preparation by independent consultants, assessing the Draft Local Plan policies and site allocations against a comprehensive framework of sustainability objectives covering topics including climate change, biodiversity, landscape, heritage, housing, economy, health, transport, water, and resources, and identifying recommendations to strengthen the plan's sustainability performance. The Council is pleased with the support for the SA methodology and approach and is committed to taking account of the SA findings and recommendations to ensure that the Local Plan delivers sustainable development, maximises positive social, economic, and environmental outcomes, and minimises adverse effects across Hertsmere.</i>
Environment	Designated Sites	Recommendation that the Sustainability Appraisal should be reviewed to ensure a more robust assessment	<i>The SA for the Draft Local Plan has been prepared iteratively by independent consultants throughout plan preparation, assessing policies and site allocations against a comprehensive framework of sustainability objectives, but the Council welcomes constructive feedback on the methodology, scope, assumptions, and conclusions. The Council will carefully consider all representations received during the Regulation 18 consultation regarding the SA, review whether additional assessment work or clarification is required to ensure robustness, work with SA consultants and statutory consultees including the Environment Agency, Natural England, and Historic England to address any identified deficiencies.</i>
Environment	Designated Sites	Further consultation required with Natural England to assess impacts of allocated sites on designated site(s)	<i>The Council recognises that consultation with Natural England as the statutory nature conservation body is essential to ensure that allocated sites and Local Plan policies adequately protect designated sites. The Council has consulted Natural England throughout preparation of the Draft Local Plan including and is committed to continuing this engagement to ensure that the Local Plan adequately protects the integrity of designated sites across Hertsmere and the wider area.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Designated Sites	Recommendation to take into account the Management Plan for the Chilterns National Landscape and to consult the Conservation Board	<i>The Council recognises that the Chilterns National Landscape (formerly Area of Outstanding Natural Beauty) is a nationally designated landscape of the highest quality whose conservation and enhancement is a statutory duty under Section 85 of the Countryside and Rights of Way Act 2000. Proposed policies requires development to conserve and enhance landscape character including the special qualities of the Chilterns National Landscape, and the Draft Local Plan has been informed by the Landscape Character Assessment and engagement with the Chilterns Conservation Board. The Council is committed to continuing consultation with the Chilterns Conservation Board, taking full account of the Chilterns National Landscape Management Plan in plan preparation and development management decisions, ensuring that allocated sites and policies protect and enhance the natural beauty, special qualities, and setting of the National Landscape, and working in partnership to deliver the objectives of the Management Plan across Hertsmere.</i>
Environment	Designated Sites	Recommendation to include strategic policies to protect and enhance valued landscapes, including the Chilterns National Landscape	<i>The Council recognises that the Chilterns National Landscape (formerly Area of Outstanding Natural Beauty) is a nationally designated landscape of the highest quality whose conservation and enhancement is a statutory duty under Section 85 of the Countryside and Rights of Way Act 2000. Proposed policies requires development to conserve and enhance landscape character including the natural beauty and special qualities of the Chilterns National Landscape, be informed by the Landscape Character Assessment, respond positively to landscape sensitivity, protect key views and skylines, and incorporate landscape enhancement measures, and proposed Policy HQD1 (Delivering High-Quality Design in Hertsmere) requires high-quality design that responds to local character and landscape setting. The Council considers that these proposed policies provide a strategic framework for protecting and enhancing valued landscapes including the Chilterns National Landscape, but will consider whether additional policy wording or supporting text should be included to strengthen landscape protection</i>
Environment	Designated Sites	Recommendation that allocations should include requirement for delivery aligned with landscape policies to avoid significant impacts on protected landscapes	<i>The Council recognises that site allocations must be informed by robust landscape evidence and include appropriate requirements to ensure that development conserves and enhances landscape character, protects the natural beauty and special qualities of the Chilterns National Landscape and other valued landscapes, and avoids significant adverse landscape impacts. Policies requires development to conserve and enhance landscape character including the Chilterns National Landscape, and candidate site policies include site-specific requirements informed by the Landscape Character Assessment, Sustainability Appraisal, and consultation with the Chilterns Conservation Board and other stakeholders. The Council will review site allocation policies to ensure that they include sufficiently detailed and robust requirements for landscape-sensitive design, layout, building heights, screening, mitigation planting, protection of key views, and integration with landscape character, explicitly referencing alignment with landscape policies</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Designated Sites	Recommendation that where a Local Wildlife Site falls within the boundary of a development site or nearby, appropriate mitigation should be put in place (including appropriate buffers / incorporation as part of the landscape design).	<i>The Draft Local Plan includes proposed policies on biodiversity and ecological networks (Policy NE7) requiring development to protect, enhance, and restore biodiversity including through safeguarding designated sites including Local Wildlife Sites, and protected habitats and species, applying the mitigation hierarchy to avoid, mitigate, and compensate for biodiversity impacts. The Council will consider whether site allocations incorporating or adjacent to Local Wildlife Sites should include specific policy requirements for appropriate mitigation, including incorporation of buffer zones.</i>
Environment	Designated Sites	Recommendation that for all allocations posing potential risk to designated sites (e.g. Redwell Wood SSSI), such as Bowmans cross, policy should include requirements around delivery of sufficient alternative natural greenspace to help mitigate adverse impacts. High-quality natural greenspace should also be provided to offer a valuable alternative for recreational activities such as dog walking.	The Council recognise the importance of protecting designated sites from recreational pressures and other impacts of nearby development and will consider requirements for alternative natural greenspace to be secured within site allocation policies, in line with the Habitats Regulations 2021. The Council have assessed the likely impacts of the level of housing growth proposed in the draft Local Plan through a Habitat Regulations Assessment, which will be published alongside the Regulation 19 draft Local Plan.
Environment	Ecology	General concern about the impact of housing development on trees across Hertsmere and the number of trees that will be lost.	<i>The Council recognises the value of trees for biodiversity, climate regulation, and amenity. Policy GI5 will require development to retain existing trees wherever possible, with robust justification required for any losses. Tree loss will be compensated through replacement planting that reflects the size and value of trees lost, and the Council will monitor canopy cover change to ensure net gains are achieved over the plan period.</i>
Environment	Ecology	General support for biodiversity net gain in development	<i>The Council welcomes support for biodiversity net gain, which is now a legislative requirement under the Environment Act 2021. The Plan will include policies requiring at least 10% biodiversity net gain for all development, with gains maintained for at least 30 years, in accordance with national regulations.</i>
Environment	Ecology	Concern for the impact of housing development on wildlife due to the loss of habitats	<i>The Council recognises that development can result in habitat loss. The Plan will require ecological assessments for development proposals likely to affect important habitats or protected species, and will apply the mitigation hierarchy requiring avoidance, mitigation, and compensation for habitat loss. Biodiversity net gain requirements will ensure development delivers overall gains for nature.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Ecology	Requests for swift bricks to be utilised at a ratio of 1:1 in new build developments	<i>Policy GI6 supports species-sensitive urban greening and states that integral swift and bat bricks should be incorporated within new buildings at a ratio of one brick per dwelling."</i>
Environment	Ecology	Recommendation that biodiversity net gain must take place close to the implicated site rather than elsewhere in the borough.	<i>The Council supports the principle of delivering biodiversity net gain on-site or as close as possible to the development site, to ensure local communities benefit from habitat enhancements and to support local ecological networks. Policy GI4 will include a spatial hierarchy for biodiversity net gain delivery, prioritising on-site provision, then off-site provision within the local area, with off-site provision elsewhere in the Borough only where this is not feasible.</i>
Environment	Ecology	General concern that the site is environmentally sensitive.	<i>The Council will ensure that all site allocations are supported by appropriate environmental assessments identifying constraints and mitigation requirements. Where sites are environmentally sensitive, allocation policies will include specific requirements to protect sensitive features and deliver appropriate mitigation and enhancement measures, in accordance with national policy on the natural environment.</i>
Environment	Ecology	HBA SA18 Land north of Barnet Lane development should 'Enhance, expand and link up existing ponds to other ponds or ecologically rich habitats.' in line with the Hertfordshire LNRS.	<i>The Council will ensure that site-specific policies for allocations with ecological features such as ponds include requirements to enhance, expand, and connect these features to wider ecological networks, informed by the Local Nature Recovery Strategy (LNRS). This will support habitat connectivity and contribute to nature recovery priorities identified in the LNRS. The Council has taken these comments into account in preparing the Regulation 19 Local Plan. Policies GI3 (Local Nature Recovery Strategy) and GI4 (Protecting and Enhancing Biodiversity, Habitats and Ecological Networks) provide a strategic approach to nature recovery, habitats, ecological networks and species. Policy GI4 requires proportionate ecological survey and assessment where protected species or habitats may be present, applies the mitigation hierarchy, requires relevant development to secure 20% Biodiversity Net Gain and requires BNG to be integrated into the design-led approach from the earliest stages and delivered on-site wherever possible. The location and type of BNG is also informed by the Hertfordshire Local Nature Recovery Strategy, with support given to measures that align with identified priorities and mapped opportunities. The policy requires development to consider impacts on notable species and the potential for species recovery and enables appropriate management plans to be secured. Policy GI5 also addresses light pollution, including impacts on wildlife, habitats and ecologically sensitive areas.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Ecology	Policy GI4 should be updated to include the following recommendations: 1. strengthened to include more emphasis on delivering enhancement and supporting nature recovery 2. strengthened to read 'must' and further clarify that Biodiversity Net Gain (BNG) must be included in early design stages to avoid ambiguity and ensure this is delivered in practice 3. Where Biodiversity Gain Sites are used, they should be located close to the development 4. BNG units should deliver gains that are significant at a local or landscape scale. Habitat enhancements should be designed to provide significant contributions to nature recovery in line with the latest Local Nature Recovery Strategy (LNRS). 5. Where proposals involve the creation of significant natural areas and habitats which are integral to development, they should be accompanied by a long-term management and monitoring plan, which must be approved by the Local Planning Authority 6. Requirement that proposals likely to impact on important habitat or notable species will need to submit an Ecological Assessment 7. Development proposals must demonstrate how they have had regard to the relevant LNRS priorities, including identifying and, where appropriate, delivering opportunities for habitat creation, enhancement and nature-based solutions 8. Proposals must avoid compromising the delivery of identified LNRS priorities and opportunities, unless it can be clearly demonstrated that there are no reasonable alternative options and any harm is appropriately avoided, mitigated or compensated. Additional points: - All development proposals must consider potential impacts upon notable species (including protected, priority (of principle importance under the Natural Environment and Rural Communities Act) or those which are suffering significant declines). Where adverse impacts can be quantified, they must be compensated for. - Development should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and	

Theme	Sub-Theme / Issue	Summary	Response
		recovery of priority species - Mitigating light impacts - Development involving or adjacent watercourses, ecological corridors and major developments must ensure that an informed assessment of potential Artificial Light at Night (ALAN) impact on wildlife is made and that ALAN is kept to the minimum level required to ensure health and safety. Where areas are identified as important to be kept dark for wildlife, lighting must be avoided.	

Theme	Sub-Theme / Issue	Summary	Response
Environment	Ecology	Recommendation to include a dedicated Local Nature Recover Strategy (LNRS) policy to identify key measures to be included within developments and green space / environmental projects	The Draft Local Plan includes proposed Policy GI4 (Protecting and Enhancing Biodiversity, Habitats and Ecological Networks). This is intended as a strategic policy that will set out the Council's approach towards promoting and securing conservation, restoration and management of habitats as well as the protection of species, working alongside the LNRS as part of a strategic approach to nature conservation and to deliver Biodiversity Net Gain within the Borough. This policy will seek to meet objectives set out in the LNRS, including by setting out the approach towards proposals that could have wider impacts on biodiversity.
Environment	Flooding/Flood Risk	General opposition to / concern about development due to perceived difficulty in supporting growth with flood risk infrastructure in practice	<i>The Council is committed to ensuring all development is safe from flooding and does not increase flood risk elsewhere, in accordance with NPPF Chapter 18. The Plan is supported by a Strategic Flood Risk Assessment that identifies flood constraints and mitigation requirements. Site allocation policies will include requirements for site-specific flood risk assessments, sustainable drainage systems, and flood mitigation measures. Development will only be allocated where it can be demonstrated to be safe and deliverable.</i>
Environment	Flooding/Flood Risk	General concern about flood risk and/or flooding and the removal of land in the flood plain causing increased flooding.	<i>The Council applies the sequential approach to flood risk as required by the NPPF, directing development to areas of lowest flood risk where possible. Where development is necessary in areas at risk of flooding, it will be subject to the sequential and exception tests and must incorporate appropriate mitigation measures including sustainable drainage systems, flood-resistant design, and flood compensation (where appropriate). Development will not be permitted where it would significantly increase flood risk elsewhere.</i>
Environment	Flooding/Flood Risk	Site Specific concern about flood risk]	<i>The Council will ensure that site-specific flood risk concerns are addressed through t site-specific flood risk assessments. Site allocation policies will include requirements for flood mitigation measures informed by detailed assessment. Development will only proceed where it can be demonstrated to be safe for its lifetime, taking account of climate change, without increasing flood risk elsewhere.</i>
Environment	Flooding/Flood Risk	Site requires level 2 SFRA and evidence that the sequential and exceptions tests have been carried out	<i>The Council will ensure that a Level 2 Strategic Flood Risk Assessment is completed where required to inform site allocations. Sites at risk of flooding will be subject to the sequential test, and where appropriate, the exception test, in accordance with NPPF Chapter 18 and national Planning Practice Guidance on flood risk and coastal change.</i>
Environment	Flooding/Flood Risk	Site lies in Source Protection Zone 1	<i>The Council will follow the guidelines set out by the National Planning Policy Framework and the Environment Agency in its further consideration of this site, taking into account the outputs of any emerging Flood Risk Assessment.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Flooding/Flood Risk	Support for the protection of SPZs; recommendation that groundwater is also protected from contamination in all areas; and reference to the EA's Approach to Groundwater Protection, which outlines a number of position statements for development within a Source Protection Zone (SPZ) where the EA would object in principle.	<i>The Council welcomes support from the Environment Agency for its approach and will continue to take into account Environment Agency advice in its further preparation of the Local Plan.</i>
Environment	Flooding/Flood Risk	Recommendation that mitigation should be included for a site allocation as a requirement in the allocation policy.	<i>The Council will continue to take into account Environment Agency advice in its further preparation of the Local Plan, including emerging allocation policy.</i>
Environment	Flooding/Flood Risk	Significant existing infrastructure capacity issues need addressing before new development is delivered.	<i>The Council is committed to ensuring all development is safe from flooding and does not increase flood risk elsewhere, in accordance with NPPF Chapter 18. The Plan is supported by a Strategic Flood Risk Assessment that identifies flood constraints and mitigation requirements, as well as by a comprehensive Infrastructure Delivery Plan (IDP), which has been prepared in collaboration with key infrastructure providers to identify existing capacity constraints and the infrastructure improvements necessary to support planned growth across the borough, relating to a wide range of infrastructure. The infrastructure requirements identified in the Local Plan evidence base reflect a realistic assessment of what is needed to ensure that new development does not place unacceptable pressure on existing services and facilities, including consideration of existing capacity issues. The Council is committed to working proactively with infrastructure providers, developers, and funding bodies to ensure that infrastructure delivery is properly coordinated and phased alongside development and will continue to monitor infrastructure capacity and delivery throughout the plan period to respond to changing circumstances and ensure that growth is supported by the infrastructure necessary to create successful, sustainable communities across Hertsmere. Site allocation policies will further include requirements for site-specific flood risk assessments and flood mitigation measures. Development will only be allocated where it can be demonstrated to be safe and deliverable.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Flooding/Flood Risk	On Policy GI2: - Bullet 1 should be strengthened with more detail and specific expectations for developers on how buffer zones should be designed and managed. e.g. they • should be at least 10m as standard, in line with definition of a riparian zone in Statutory BNG metric, although there may be instances where a smaller buffer is agreed; • should be designed and managed for the benefit of ecology and biodiversity; and • must include a long term landscape and ecological management plan, which includes the management of invasive non-native species (INNS). - Support for Policy GI2 bullet 2, with recommendation that it should read 'investigate and maximise opportunities to enhance or restore river channels and their riparian zones, flood flow pathways, floodplains and other natural flood management features with the objective of returning them to their natural state wherever possible.' - Support for Policy GI2 bullet 3, with recommendation to include a specific reference to de-culverting watercourses where feasible. - Support for Policy GI2 bullet point 4, with suggested re-wording of 'Incorporate measures to enhance the amenity, recreational and historic value of water spaces, including enhancing public access to these spaces. Where access to a watercourse is proposed the development must include appropriate zoning to establish areas for people and areas for wildlife as agreed by the Environment Agency'.	<i>The Council has taken these comments into account in preparing the Regulation 19 Local Plan. Policy GI2 (Hertsmere's Watercourses and Blue Infrastructure) requires an undeveloped buffer of at least 10 metres alongside watercourses, designed and managed for the benefit of ecology and biodiversity and supported by long-term landscape and ecological management arrangements. The policy also requires opportunities to enhance or restore river channels, riparian zones, floodplains and natural flood management features to be maximised, supports de-culverting where feasible, and requires development to enhance the ecological, amenity, recreational and historic value of water spaces. Where public access to a watercourse is proposed, appropriate zoning between areas for people and wildlife is required.</i>
Environment	Flooding/Flood Risk	Recommended change of reference in paragraph 9.2.3 to the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017 instead of the now out of date European Water Framework Directive 2000; clarification within either Policy or Supporting Text that WFD is implemented through River Basin Management Plans (RBMPs); and addition of requirement in Policy that WFD Assessment is carried out for any development which may impact a waterbody, both surface water and groundwater.	<i>The Council has taken these comments into account in preparing the Regulation 19 Local Plan. Policy GI5 (Protection from Environmental Pollution) requires development to have regard to the objectives of the Thames River Basin Management Plan and not result in deterioration of water bodies or prevent the attainment of good status or potential. The supporting text confirms that the Water Framework Directive is implemented through River Basin Management Plans, refers to the Water Environment (Water Framework Directive) (England and Wales) Regulations 2017, and sets out the role and scope of Water Framework Directive Assessments in considering potential impacts on surface water and groundwater.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Flooding/Flood Risk	Recommendation for a standalone water quality policy that: 1. Defines what a watercourse is, 2. Promotes opportunities for de-culverting of watercourses to be actively pursued. 3. Ensures buildings must not introduce permanent overshadowing to the watercourse. 4. Prioritises flood mitigation which restores and works with natural processes and favours Natural Flood Management techniques (NFM).	<i>The Council has considered this recommendation. Rather than introducing a standalone water-quality policy, the Regulation 19 Local Plan addresses these matters through Policies GI2 and GI5. Policy GI2 defines watercourses for the purposes of the policy, supports de-culverting, prevents new buildings from permanently overshadowing watercourses and gives preference to flood mitigation measures that restore and work with natural processes, including Natural Flood Management. Policy GI5 provides the wider policy framework for protecting surface water and groundwater from pollution.</i>
Environment	Flooding/Flood Risk	Recommendation for the Plan to set out a strategic approach on how development should prioritise different environmental outcomes for watercourses in different locations, informed by the Thames River Basin Management Plan (TRBMP) and the Local Nature Recovery Strategy (LNRS). This could include highlighting areas within the Borough where particular watercourses should focus on delivering specific functions, e.g. natural flood management, strengthening wildlife corridors, supporting priority habitats and species, or improving water quality.	<i>The Council has taken these comments into account in preparing the Regulation 19 Local Plan. Policies GI2, GI3 and GI5 provide a coordinated approach to watercourses, nature recovery and water quality. Policy GI2 requires development to respond to the environmental and ecological functions of blue infrastructure, safeguard Local Nature Recovery Strategy priority areas, protect and enhance chalk streams, and maximise opportunities to restore river channels, riparian zones, floodplains and natural flood management features. Policy GI3 provides the strategic relationship with the Hertfordshire Local Nature Recovery Strategy, while Policy GI5 requires development to have regard to the Thames River Basin Management Plan and protect the status of surface water and groundwater.</i>
Environment	Flooding/Flood Risk	Concern that stilts and voids are being promoted as flood plain storage compensation in the minimising and management of flood risk, contrary to other Hertfordshire and North London policy approaches, favouring use of under-croft car parks as a form of water storage.	<i>Proposed Policy SD7 (Minimising and Managing Flood Risk) requires development to avoid areas at risk of flooding, demonstrate that it will be safe over its lifetime, not increase flood risk elsewhere, incorporate appropriate flood risk management measures including Sustainable Drainage Systems (SuDS), and where development is located within the fluvial floodplain provide level-for-level compensatory floodplain storage. The Council will consider whether policy wording or supporting text should clarify the acceptability and design requirements for different forms of compensatory floodplain storage informed by engagement with the Environment Agency and the Lead Local Flood Authority (Hertfordshire County Council), promoting effective and sustainable flood risk management solutions across Hertsmere.</i>
Environment	Flooding/Flood Risk	Recommendation to maintain the policy approach set out in the previous Regulation 18 Local Plan, which classified land within 20m of a main river as flood zone 3, in the absence of Main Rivers modelling for Hertsmere.	<i>The Draft Local Plan has been informed by the Level 1 and Level 2 Strategic Flood Risk Assessment, which assess flood risk from all sources including fluvial (river) flooding, and proposed Policy sd7 (Minimising and Managing Flood Risk) requires development to avoid areas at risk of flooding and apply the sequential and exception tests where necessary. The Council will review whether the policy should include explicit precautionary requirements for development near main rivers where detailed hydraulic modelling is not available, such as classifying land within a specified distance (for example 20 metres) of a main river as higher flood risk, working with the Environment Agency and the Lead Local Flood Authority (Hertfordshire County Council) to ensure that the approach is appropriate, evidence-based, and provides effective protection from fluvial flood risk across Hertsmere.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Flooding/Flood Risk	Recommendation for the Plan to use updated climate change allowances (updated since the preparation of the SFRA) so that developments can take account of future flood risk with climate change impacts in the design process.	Proposed Policy SD7 (Minimising and Managing Flood Risk) requires development to demonstrate that it will be safe over its lifetime taking account of climate change, and site-specific flood risk assessments must use the latest Environment Agency climate change allowances for peak river flows and peak rainfall intensity. The Council will review the Strategic Flood Risk Assessment evidence base and policy wording to ensure that reference is made to the most up-to-date climate change allowances published by the Environment Agency.
Environment	Flooding/Flood Risk	Recommendation of added / amended wording for Policy EC3 to stipulate SUDS requirement for all developments; to require that SUDS should not negatively impact ground water quality; and to require that in all cases the SUDs train should provide sufficient water quality treatment in line with the land use of the drainage catchment and sensitivity of the receiving groundwater body. Further recommendation that appropriate guidance should be referenced in the support text to clarify best practice in relation to SUDS.	Proposed Policy SD8 requires all major development to incorporate SuDS designed to manage surface water run-off, reduce flood risk, improve water quality, and deliver biodiversity benefits, but the Council will consider whether additional policy wording or supporting text should explicitly require that SuDS must protect groundwater quality, provide appropriate water quality treatment through the SuDS treatment train based on development land use and groundwater sensitivity, and reference best practice guidance
Environment	Health Impacts	Concerns about the impact of proposed housing growth on noise, dust and light pollution	<i>The Council recognises that development can increase light pollution, affecting wildlife, dark skies, and residential amenity. The Plan will include policies requiring development to minimise light pollution through appropriate lighting design, limiting upward light spill, and using motion sensors and timers. This aligns with NPPF paragraph 191 on limiting the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation.</i>
Environment	Health Impacts	General concern about the impacts of housing development on the health / wellbeing of residents	<i>The Council is committed to promoting healthy communities through the Local Plan. Policies will require development to support healthy lifestyles through provision of green spaces, active travel infrastructure, access to healthcare and community facilities, and healthy design principles. The Plan's approach is informed by health impact considerations and engagement with public health partners.</i>
Environment	Health Impacts	Concerns of the impact of development on residents' mental health	<i>The Council recognises that the built environment can affect mental health and wellbeing. The Plan will promote design that supports mental health through provision of accessible green spaces, opportunities for social interaction, safe and attractive public realm, and connections to nature. This approach aligns with NPPF paragraph 96 on promoting healthy, inclusive communities.</i>
Environment	Health Impacts	Support for requirement for Health Impact Assessment to focus on major developments with potential for significant health impacts; proposals located within an Air Quality Focus Area; and relevant health-sensitive uses such as hot-food takeaways, betting shops, education facilities, health and social care facilities, leisure and community facilities and publicly accessible open space.	<i>The Council welcomes support for requiring Health Impact Assessments for major developments and health-sensitive uses. This approach will ensure health impacts are identified and mitigated through the planning process, supporting the delivery of healthy places and reducing health inequalities.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Health Impacts	The Council should set out its own HIA requirement to help implement its strategic objective on healthy communities.	<i>The Council will include clear policy requirements for Health Impact Assessments, setting out when they are required, what they should address, and how they will inform planning decisions. This will provide certainty for applicants and ensure health considerations are systematically addressed through the planning process.</i>
Environment	Health Impacts	Recommendation that the Plan's Health and Wellbeing chapter should consider key data and findings of the Council's emerging Playing Pitch Strategy and Built Facilities Strategy and of the Hertfordshire Growth Board's new Healthy and Safe Places Framework	<i>The Council will ensure that the Health and Wellbeing chapter is informed by the Playing Pitch Strategy, Built Facilities Strategy, and Hertfordshire Growth Board's Healthy and Safe Places Framework. This will ensure a comprehensive, evidence-based approach to promoting health and wellbeing through the planning system.</i>
Environment	Health Impacts	Recommendation to include a comprehensive policy on healthy places in the Plan, and for Council to engage with NHS on this ahead of the Regulation 19 stage.	<i>The Council recognises that planning policies and decisions should support healthy, inclusive, and safe communities. The Draft Local Plan addresses health and wellbeing through multiple proposed policies including Policy HQD1 (Delivering High-Quality Design in Hertsmere), which requires high-quality, inclusive design; Policy GI1 (Hertsmere's Green and Blue Infrastructure) which require accessible green and blue infrastructure; Policy TR1 (Sustainable Transport and Movement), which prioritises walking and cycling; and policies on housing, community facilities, air quality, and climate change. The Regulation 19 Local Plan addresses health and wellbeing as a cross-cutting matter through its design, green infrastructure, sustainable transport, community infrastructure and environmental policies. Policy DM6 also requires a Health Impact Assessment for specified forms of development.</i>
Environment	Health Impacts	Concern about the impacts of development on unstable ground and its impact on human health and safety	<i>The Council recognises that development must be safe and suitable for its intended use, and that development on unstable or contaminated land must incorporate appropriate investigation, remediation, and mitigation measures to protect public health and safety. Proposed Policy SD9 (Ground Conditions) requires development on land that is known or suspected to be contaminated or unstable to be supported by appropriate site investigation, risk assessment, and remediation strategy to ensure that the site is suitable for its proposed use and does not pose unacceptable risks to human health, controlled waters, or the environment, and to incorporate appropriate mitigation measures including ground stabilisation where necessary. The Council is committed to ensuring that all development proposals on potentially unstable land are subject to robust assessment in consultation with the Council's Environmental Health team, the Environment Agency, the Coal Authority (where applicable), and other relevant bodies, and that appropriate conditions are imposed to secure investigation, remediation, and verification to protect human health and safety across Hertsmere.</i>
Environment	Health Impacts	Recommendation that specific policy requirements to build for healthy places should include the following, which are priorities for the health system and clearly cross-referenced to other policies with appropriate level of further details in the Supporting Text. We encourage the Council to add/ supplement other general health determinants: All developments should demonstrate how they support healthy places and lives, addressing physical and mental health	<i>The Council recognises that planning policies and decisions should support healthy, inclusive, and safe communities. The Draft Local Plan addresses health and wellbeing through multiple proposed policies, including Policy HQD1 (Delivering High-Quality Design in Hertsmere), Policy HQD2 (Inclusive and Welcoming Design), Policy HQD3 (Public Realm and Connecting Places) which ensure high quality design is delivered in new developments to promote healthy places, Policy SD1 (Responding to the Climate Emergency) which seeks ensure the green and open spaces are protected and enhanced, Policy GI1 (Hertsmere's Green and Blue Infrastructure) which require accessible green and blue infrastructure and Policy TR1 (Sustainable Transport and Movement), which prioritises walking and cycling; and policies on housing, community facilities, air quality, and climate change. The Council will consider whether a standalone comprehensive 'Healthy Places' policy should be included to bring together health and wellbeing considerations in a clearer and more coordinated framework, informed by engagement with the NHS Hertfordshire and other relevant stakeholders.</i>

Theme	Sub-Theme / Issue	Summary	Response
		impacts and help to reduce health inequalities through the planning system. In doing so, they should demonstrate how they meet identified local health needs and support delivery of local health, wellbeing and estate infrastructure strategies. 1. Optimise early and proactive engagement with the director of public health, NHS and health system partners in support of delivering local health needs and priorities. 2. Utilise appropriate design tools and formal assessments to demonstrate how developments enable and support healthy lives across general health determinants. 3. Provide opportunities for people to improve physical activity through active travel modes that ensure developments are well connected to employment, health and leisure facilities and public transport. 4. Encourage safe, secure and public spaces and places that promote community cohesion and optimise inclusive access for the general population and specific groups. 5. Promote sustainable developments that consider the health impact of climate change and help deliver local objectives for net zero and improved air quality. 6. Provide access to a healthy food environment, including managing appropriate locations of food and drink uses, and making space for food growing opportunities (allotments and/or providing sufficient garden space). 7. Make provision for key worker affordable housing, in particular NHS workers, where there is identified local housing need. 8. Provide sufficient opportunities for access to and contact with the natural environment in all developments including community facilities. 9. Deliver improved or new healthcare infrastructure with good accessibility in neighbourhoods of high deprivation or town centre locations.	
Environment	Pollution	Concerns about the impact of proposed growth on light pollution	<i>The Council recognises that development can generate light pollution that impacts residential amenity, wildlife, and dark skies. The Plan will include policies requiring development to minimise light pollution through appropriate lighting design, including use of directional lighting, timers, and lower intensity lighting where appropriate. This aligns with NPPF paragraph 193 on limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Pollution	Concerns around air quality in the Borough, both in terms of its impact on human health and in terms of its impact on habitats and protected species	<i>The Council takes air quality seriously given its impacts on health and biodiversity. The Plan is supported by an Air Quality Assessment that identifies constraints and mitigation requirements. Development will be required to incorporate measures to minimise air pollution, including sustainable transport provision, electric vehicle charging infrastructure, and green infrastructure. Development affecting designated sites will require air quality assessments to demonstrate no adverse impacts on habitats and species.</i>
Environment	Pollution	Site contains historic landfill	<i>The Council notes the presence of historic landfill on the site. Site allocation policies will require appropriate ground contamination assessments and remediation strategies to be submitted with planning applications, in accordance with NPPF paragraph 189 on ensuring sites are suitable for their proposed use, taking account of ground conditions and land instability.</i>
Environment	Pollution	HBCA SA1 Bowmans Cross is predominantly located on Tyttenhanger Landfill. This has not been returned to agricultural use, with large areas active for quarrying mineral and landfill for the disposal of waste, so must be regarded as a Waste Management Facility. Based on the current planning permission, the quarry is unlikely to exhaust mineral reserves before the end of 2032 with restoration planned at the earliest for 2035. For the development to go ahead within the timeframe of the Local Plan it may be technically feasible to enable the phased release of land through amendments to the environmental permit and land engineering to introduce physical separation of the waste mass. This could release phases of land for redevelopment but may be financially prohibitive.	<i>Policy HBCA SA1 acknowledges the site's complex constraints and requires phased delivery coordinated with completion of mineral extraction and landfill operations, comprehensive ground investigation, contamination and landfill gas risk assessment, appropriate remediation, and liaison with the Environment Agency, Hertfordshire County Council as minerals and waste planning authority, and site operators. The Council will carefully consider all representations regarding the site's deliverability, technical feasibility, phasing, and viability, and will continue engagement with landowners, operators, the Environment Agency, and Hertfordshire County Council to ensure that the allocation is realistic, deliverable within the plan period, and appropriately addresses all technical, environmental, and viability constraints.</i>
Environment	Pollution	HBCA SA1 Bowmans Cross is located on Tyttenhanger Quarry (North of Coursers Road). The Environment Agency continue to regulate this closed and restored, but still permitted, landfill. Any physical disturbance, including changes to the land use will impact the risk this site poses and will require a variation before they can be implemented. This site may be compatible with a proposed change of use. However, all arisings from the development would remain controlled waste and need to be sent off site for recovery or disposal. The Environment Agency are also aware of a potential waste activity which has occurred/is occurring to the east of the proposed development, which is currently under investigation. This may require the removal or disturbance of waste from site which could impact the Bowmans Cross	<i>Policy HBCA SA1 requires comprehensive ground investigation, contamination and landfill gas risk assessment, appropriate remediation, management of controlled waste in accordance with environmental regulations, and close liaison with the Environment Agency throughout the planning and development process. The Council is committed to working closely with the Environment Agency, site promoters, and other relevant bodies to ensure that all environmental permit requirements, controlled waste management obligations, and environmental risks including those arising from adjacent sites are fully addressed, and that development proceeds only when it is safe, technically feasible, environmentally acceptable, and compliant with all regulatory requirements across the site.</i>

Theme	Sub-Theme / Issue	Summary	Response
		development and pose risk to air quality, noise, change surface drainage, or the hydrogeological setting.	
Environment	Pollution	HBCA SA1 Bowmans Cross is located close to the North London Anaerobic Digestion Facility. Due to potential safety risks to human health from the operation of the plant and amenity impacts this site will experience due to air quality and odour where emergency releases of gasses are necessary, a substantial buffer of at least 100m should be placed around the site.	<i>HBCA SA1 requires development to be informed by air quality, odour, and health impact assessments, and to incorporate appropriate design, layout, landscaping, and mitigation measures to protect residential amenity. The Council will work closely with the Environment Agency, the Council's Environmental Health team, site promoters, and operators of the North London Anaerobic Digestion Facility to determine appropriate buffer distances based on site-specific risk assessment, odour modelling, and emergency scenario analysis, and will amend the site allocation policy if necessary to specify minimum buffer distances or other safeguarding requirements to ensure that development does not result in unacceptable risks to public health, safety, or amenity. The Regulation 19 Local Plan recognises the existing waste and industrial uses affecting Bowmans Cross. The allocation and Plan-wide policies require pollution, health, amenity and ground-condition impacts to be assessed and addressed through the design and masterplanning of development.</i>
Environment	Pollution	Support for the requirement of submission of Preliminary Risk Assessments with planning applications.	<i>The Council welcomes support for requiring Preliminary Risk Assessments. This ensures that potential contamination risks are identified early and appropriately addressed, protecting human health and the environment in accordance with national policy.</i>
Environment	Pollution	HRA SA3 Land North of Watford Road and East of Kemprow, Radlett is located close to Blackbird Sewage Treatment Works. Therefore, any development must manage amenity impacts. Thames Water recommend inclusion of a Local Plan policy (per NPPF para 200) to protect residents and avoid restricting existing uses.	<i>Policy HRA SA3 requires development to be informed by odour assessment in consultation with Thames Water and the Council's Environmental Health team, and to incorporate appropriate design, layout, landscaping, and mitigation measures to protect residential amenity. The relevant Regulation 19 allocation requires developers to work with the Council and Thames Water to identify appropriate design-focused avoidance or mitigation measures in relation to the neighbouring Blackbirds Farm Sewage Works.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Pollution	Request that air quality and traffic impacts on designated sites should be assessed and mitigation should be proposed to minimise the impact, through the SA and HRA of the Plan. One of the main issues which should be considered is the increased nitrogen emissions as a result of increased traffic generated from development. Impacts on designated sites, local sites and the natural environment can be assessed using the 200m distance criterion and local air quality modelling where required.	<i>The Council acknowledges the impacts that increased traffic generated from new development can have on the natural environment and is assessing the impacts of the spatial strategy through an SA and HRA of the draft Local Plan, which will be published at Regulation 19. The Council will consider relevant mitigation identified to reduce Likely Significant Effects from new development for inclusion in the Plan.</i>
Environment	Waste management	Concerns about the ability to accommodate proposed growth in terms of waste management	<i>The Council has assessed waste management capacity through the Infrastructure Delivery Plan. Development will be required to incorporate adequate waste storage and collection facilities, and the Council will work with waste management providers to ensure capacity can accommodate growth. Policies will promote circular economy principles and waste minimisation in accordance with NPPF paragraph 194 on planning for waste management.</i>
Environment	Ecology	Support for site due to no significant impacts on ecology	<i>The Council recognises that ecological and biodiversity considerations are critical in site allocation and development management decisions, and that development must protect and enhance biodiversity and geodiversity. The Draft Local Plan includes proposed policies requiring development to protect and enhance biodiversity (Policy GI4), deliver biodiversity net gain of at least 10 per cent, protect designated sites and priority habitats, safeguard protected and priority species, incorporate ecological enhancements, and contribute to ecological networks and the Nature Recovery Network, with the site allocation process informed by ecological surveys, Habitats Regulations Assessment, ecological impact assessments, and consultation with Natural England and the local nature partnership to assess ecological constraints and opportunities. The Council will ensure that the Regulation 19 Publication version of the Local Plan includes only those site allocations that can be delivered without unacceptable ecological impacts and that contribute positively to biodiversity conservation, enhancement, and net gain in accordance with national policy and environmental legislation.</i>

Theme	Sub-Theme / Issue	Summary	Response
Environment	Ecology	Concern over ability to deliver BNG	<i>The Council recognises that development proposals must demonstrate measurable biodiversity net gain, with a mandatory minimum 10 per cent gain required under the Environment Act 2021 and associated regulations. The Draft Local Plan includes proposed policies requiring all development to achieve biodiversity net gain of at least 10 per cent calculated using the statutory biodiversity metric (Policy GI4), prioritising on-site delivery through incorporation of native planting, green roofs and walls, sustainable drainage features, wildlife corridors, habitat creation and enhancement, and retention and enhancement of existing habitats and ecological features, with off-site provision or payments to strategic biodiversity projects permitted where on-site delivery is demonstrated to be unviable or insufficient, and with BNG secured and monitored through planning conditions and obligations for a minimum 30-year period. The Council will engage with Natural England, the local nature partnership, ecology specialists, developers, and landowners to identify opportunities for on-site and off-site BNG delivery including strategic habitat creation sites and biodiversity offsetting schemes. The Regulation 19 Publication version of the Local Plan will include robust, clear, and deliverable BNG policy supported by evidence and guidance to ensure that development delivers meaningful, measurable, and lasting biodiversity gains that contribute to nature recovery, ecological resilience, and environmental enhancement across Hertsmere in accordance with national policy and environmental legislation.</i>
Environment	Ecology	Recommendation that policy should make direct reference to enhancing and restoring chalk stream habitats	<i>The Draft Local Plan includes policies on biodiversity and ecological networks (Policy GI4), water environment and quality (Policy GI2), and sustainable drainage (Policy SD8) which require development to protect and enhance biodiversity including priority habitats, watercourses, and aquatic ecosystems. The Council will consider this recommendation in the context of these policies.</i>
General Opinion of Plan	Concern/objection	General concern about / objection to the Local Plan, Spatial Strategy, policies and proposed allocations	<i>The Council has prepared the Local Plan in accordance with national policy and based on robust evidence. All representations received will be carefully considered in preparing the Regulation 19 version of the Plan. The Plan seeks to balance meeting identified development needs with protecting the environment, heritage and residential amenity, in line with the NPPF's requirements for sustainable development.</i>
General Opinion of Plan	Concern/objection	Concern about the Local Plan for not being sufficiently specific to local considerations	<i>The Council is developing Settlement Visions to provide locally specific policy guidance for each main settlement. These will be informed by community engagement and will address local character, infrastructure needs and design requirements. Site allocation policies will include site-specific requirements tailored to local circumstances.</i>
General Opinion of Plan	Concern/objection	General concern about how the impacts of data centre development have been accounted for in the plan.	<i>The Regulation 19 Local Plan identifies a need for up to 10.8 hectares of land for data centres. Proposals are addressed through the employment, digital connectivity, sustainable design and environmental policies of the Plan, together with relevant site-allocation requirements.</i>

Theme	Sub-Theme / Issue	Summary	Response
General Opinion of Plan	General Comment	Promotion of the requirement for development to be compliant with Neighbourhood Plan provisions, including through use of planning conditions, obligations and monitoring	<i>The Council supports Neighbourhood Plans as an important part of the development plan. Compliance with Neighbourhood Plans, where they form part of the statutory development plan for a place, are secured through national policy and legislation.</i>
General Opinion of Plan	General Comment	General opinion or comment on the plan	<i>The Council welcomes all feedback on the Plan. All representations received will be carefully considered in preparing the Regulation 19 version of the Local Plan.</i>
General Opinion of Plan	General Comment	Recommendation that the following technical terms used in the context of heritage are included in a Plan glossary: Significance, setting, listed buildings, conservation areas, scheduled monuments, registered parks and gardens, and designated and non-designated heritage assets.	<i>The Council agrees that a comprehensive glossary is important for accessibility and clarity. The Regulation 19 Plan will include a glossary defining key technical terms including those relating to heritage assets, to assist readers in understanding policy requirements.</i>
General Opinion of Plan	General Comment	Request for reference within policy or supporting text to explain that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing growth, to help demonstrate that the plan is positively prepared and deliverable.	<i>The relevant Regulation 19 allocation requires developers to work with the Council and Thames Water to identify appropriate design-focused avoidance or mitigation measures in relation to the neighbouring Blackbirds Farm Sewage Works.</i>
General Opinion of Plan	Support	General support for the Local Plan, Spatial Strategy, policies and proposed allocations	<i>The Council welcomes support for the Local Plan, Spatial Strategy, policies and proposed allocations.</i>
General Opinion of Plan	Support	Support for Historic Environment policies	<i>The Council welcomes support for the Plan's Historic Environment policies, which seek to conserve and enhance the Borough's heritage assets in accordance with the NPPF.</i>
General Opinion of Plan	General Comment	Recommendation that local plan should make clear Local Nature Recovery Strategies are to inform appropriate development and contribute to nature recovery as opposed to restricting them.	The Council will ensure that the Local Plan includes positive policy wording that presents the Hertfordshire Local Nature Recovery Strategy as an evidence base and strategic framework that informs and enables appropriate, well-designed, and nature-positive development, guides strategic delivery of biodiversity net gain and green infrastructure towards priority locations and habitats that contribute to landscape-scale nature recovery and ecological connectivity, supports developers, landowners, and planning decision-makers in identifying opportunities to align development and land management with nature recovery objectives, and ensures that the planning system contributes positively to achieving local and national commitments for biodiversity recovery, climate resilience, and environmental improvement whilst facilitating sustainable development that meets community needs and supports economic prosperity across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
General Opinion of Plan	General Comment	Recommendation to allow for sufficient flexibility in policy wording on site allocation policies to accommodate changes in circumstances	The Council will look to ensure that the Local Plan will includes clearly written site allocation policies that provide certainty to developers, landowners, infrastructure providers, and communities about the Council's expectations and requirements. The policies will set out clear strategic principles, development quanta, infrastructure requirements, and environmental safeguards necessary to deliver sustainable, high-quality development, but will also incorporate appropriate sufficient flexibility to accommodate detailed technical findings, viability considerations, design innovation, and changing circumstances that may emerge during detailed design and planning application stages
Green Belt/grey belt	Green Belt/grey belt	General acknowledgement that building on the Green Belt may be necessary to meet housing need	<i>The Council acknowledges that, given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is necessary to deliver sustainable development. The Plan follows the approach set out in the NPPF, prioritising brownfield land and optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated.</i>
Green Belt/grey belt	Green Belt/grey belt	Support for delivering more housing on land proposed for Green Belt release, to make more effective use of the release / of this land and deliver more affordable homes	<i>The Council seeks to optimise the use of land proposed for Green Belt release to maximise housing delivery, including affordable homes, while respecting site constraints and local character. Site capacities will be informed by masterplanning, design analysis and infrastructure capacity.</i>
Green Belt/grey belt	Green Belt/grey belt	Concern that the proposed approach to new homes in the countryside/ Green Belt is too loose and will risk undermining the settlement-focused spatial strategy / risk incremental and cumulative development in the countryside and Green Belt.	<i>The Council's spatial strategy focuses development in settlements to support infrastructure, services and sustainable transport. Policies on development in the countryside and Green Belt will be tightly drawn to prevent inappropriate development and incremental harm to Green Belt purposes, in accordance with NPPF Chapter 13. Only development consistent with Green Belt purposes or meeting specific rural needs will be permitted outside settlement boundaries.</i>
Green Belt/grey belt	Green Belt/grey belt	Opposition to the proposed requirements for the percentage of affordable housing on Green Belt sites.	<i>The Plan's affordable housing requirements on Green Belt sites are based on evidence of need in our Housing Needs Assessment and of viability testing through the Whole Plan Viability Assessment, as well as the requirements of the NPPF. grey belt development will need to follow the Golden Rules, including on affordable housing.</i>
Green Belt/grey belt	Green Belt/grey belt	General concern / opposition to building housing on the Green Belt as it is contrary to national policy and should be protected	<i>The Council's spatial strategy seeks to minimise Green Belt loss through prioritising brownfield land, optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated. However, given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is necessary. The Plan follows the approach set out in NPPF Chapter 13 on protecting Green Belt land.</i>

Theme	Sub-Theme / Issue	Summary	Response
Green Belt/grey belt	Green Belt/grey belt	Preference for building on land outside of the Green Belt at higher densities	<i>The Council's spatial strategy seeks to minimise Green Belt loss through prioritising brownfield land, optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated. However, given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is necessary. The amount of brownfield land which has been put forward for development, and which is deemed to be available, suitable and achievable for development is insufficient to meet identified need for housing and employment land, even if densities are optimised. The Plan follows the approach set out in NPPF on protecting Green Belt land and optimising densities.</i>
Green Belt/grey belt	Green Belt/grey belt	Preference for a brownfield first approach to development and PDL before developing on the Green Belt	<i>The Plan follows the approach set out in the NPPF, prioritising brownfield and previously developed land and optimising development densities and only releasing Green Belt where insufficient other development land can be found that is available, suitable, and achievable for development and where exceptional circumstances can be demonstrated.</i>
Green Belt/grey belt	Green Belt/grey belt	Concern on / opposition to Green Belt assessment methodology and/or conclusions	<i>The Hertsmere Green Belt Assessment is an independent study which follows the approach set out in the NPPF and the latest Planning Practice Guidance. The study evaluates the existing Green Belt across Hertsmere and as required by the NPPF, seeks to identify potential grey belt.</i>
Green Belt/grey belt	Green Belt/grey belt	Concern on / opposition to building on the Green Belt due to threat to green space / open space for residents	<i>The Hertsmere Green Belt Assessment follows the approach set out in the NPPF and latest Planning Practice Guidance. Not all Green Belt is green space or providing open space which can be used by residents. The Green Belt Assessment judges whether any of the areas and assets listed in NPPF footnote 7 would provide a strong reason for refusing or restricting development on the assessment area. The features in Footnote 7 of the NPPF relate to biodiversity, local green space, irreplaceable habitats, historic environment, and flood risk. Presence of some Local Green Space on a parcel of Green Belt Land being assessed is deemed to potentially provide a strong reason for refusing or restricting development with possibility of mitigation. Where a parcel of Green Belt land being assessed is entirely Local Green Space, this potentially provides a strong reason for refusing or restricting development with little or no possibility of mitigation. The other assets and features in footnote 7 are evaluated similarly.</i>
Green Belt/grey belt	Green Belt/grey belt	Concern on / opposition to building on the Green Belt due to threat to habitats	<i>The Hertsmere Green Belt Assessment follows the approach set out in the NPPF and latest Planning Practice Guidance. Not all Green Belt is providing valuable habitat. The Green Belt Assessment judges whether any of the areas and assets listed in NPPF footnote 7 would provide a strong reason for refusing or restricting development on the assessment area. The features in Footnote 7 of the NPPF relate to biodiversity, local green space, irreplaceable habitats, historic environment, and flood risk. Presence of or adjacency to irreplaceable habitats on a parcel of Green Belt Land being assessed is deemed to potentially provide a strong reason for refusing or restricting development with possibility of mitigation. Where a parcel of Green Belt land being assessed has extensive or total presence of irreplaceable habitats, this potentially provides a strong reason for refusing or restricting development with little or no possibility of mitigation. The other assets and features in footnote 7 are evaluated similarly.</i>

Theme	Sub-Theme / Issue	Summary	Response
Green Belt/grey belt	Green Belt/grey belt	Concern that the approach taken to designating 'Grey belt' and 'Potential Grey belt' in the Green Belt Assessment would fundamentally undermine the purpose (taken together) of the remaining Green Belt, contrary to the NPPF and WMS (2024).	<i>The Hertsmere Green Belt Assessment is an independent study which follows the approach set out in the NPPF and the latest Planning Practice Guidance. The study evaluates the existing Green Belt across Hertsmere and as required by the NPPF, seeks to identify potential grey belt. The Assessment contains a dedicated section which identifies if the release or development of the assessment area/s would fundamentally undermine the five Green Belt purposes (taken together) of the remaining Green Belt when considered across the area of the plan. This part of the Assessment also clearly identifies areas that are identified to be fundamentally important to the Green Belt across the area of the plan as a whole area.</i>
Green Belt/grey belt	Green Belt/grey belt	Opposition to Borehamwood being categorised as the only 'large built-up area' in the Green Belt Assessment as this is contrary to aim of Government, the settlement hierarchy and the position established in two appeals that Radlett should be consider a 'large built-up area' due to its population size.	<i>The Hertsmere Green Belt Assessment is an independent study which follows the approach set out in the NPPF and the latest Planning Practice Guidance. There are no set definitions of large built-up area (LBUA) in the NPPF or Planning Policy Guidance, leaving the way open for different interpretations. It should be noted that some Green Belt Assessments are using a population threshold of 75,000 (Radlett's population is around 10,000) and some planners contend that London is the only LBUA in the Metropolitan Green Belt. The Hertsmere GBA uses a more considered approach based on the existing settlement hierarchy, making the judgement that only the tier 1 settlement should be a LBUA. This approach was accepted by the neighbouring authorities.</i>
Green Belt/grey belt	Green Belt/grey belt	Opposition to the approach to defining 'large built-up area' in the Green Belt Assessment and view that Potters Bar, Radlett and Bushey should also be defined as a 'large built-up area'.	<i>The Hertsmere Green Belt Assessment is an independent study which follows the approach set out in the NPPF and the latest Planning Practice Guidance. There are no set definitions of large built-up area (LBUA) in the NPPF or Planning Policy Guidance, leaving the way open for different interpretations. It should be noted that some Green Belt Assessments are using a population threshold of 75,000 (Radlett's population is around 10,000) and some planners contend that London is the only LBUA in the Metropolitan Green Belt. The Hertsmere GBA uses a more considered approach based on the existing settlement hierarchy, making the judgement that only the tier 1 settlement should be a LBUA. This approach was accepted by the neighbouring authorities.</i>
Green Belt/grey belt	Green Belt/grey belt	Concern that all sites adjoining or close to the built-up areas of Potters Bar, Bushey and Radlett, as well as Borehamwood, have not been assessed against purpose a) of the Green Belt purposes.	<i>There are no set definitions of large built-up area (LBUA) in the NPPF or Planning Policy Guidance. The existing settlement hierarchy has been used to define which settlements are LBUs. Paragraph 2.4.7 specifies that purpose A has been applied to Borehamwood, Watford and Greater London, the other settlements are towns or villages.</i>
Green Belt/grey belt	Green Belt/grey belt	Concern that the narrow definition of 'near to' in the Green Belt Assessment has undermined the assessment of the contribution that land parcels make to purpose a)	<i>The Hertsmere Green Belt Assessment is an independent study which follows the approach set out in the NPPF and the latest Planning Practice Guidance. There are no set definitions of 'near to' in the NPPF or Planning Policy Guidance, leaving the way open for different interpretations. The definition that has been applied in the Green Belt Assessment is outlined in paragraph 2.4.6 of the report and the Council consider this definition consistent with other Green Belt Assessments. This approach has been accepted by the neighbouring authorities.</i>

Theme	Sub-Theme / Issue	Summary	Response
Green Belt/grey belt	Green Belt/grey belt	Concern that the acceptance of the conclusions of neighbouring plan areas Green Belt Assessments has significantly impacted the conclusions of the Hertsmere Green Belt Assessment, as neighbouring assessments were conducted before December 2024 and therefore cannot have been derived from an analysis that took in the new concept of Grey belt and/or the new Government approach to Green Belt	<i>The Hertsmere GBA has been undertaken using the up-to-date policy and guidance.</i>
Green Belt/grey belt	Green Belt/grey belt	Opposition to the conclusion of the Green Belt Assessment in asserting that the land north of Bushey Heath and Bushey is not contributing strongly to purpose a)	<i>The Green Belt Assessment uses the illustrative features in the PPG to assess all purposes and applies these to the relevant settlements.</i>
Green Belt/grey belt	Green Belt/grey belt	Concern over the conclusion of the Green Belt Assessment regarding the contribution that land around Radlett makes to purpose b) and that most of the land to the south and west of Radlett would also meet this purpose strongly in preventing coalescence between Radlett and Bushey/Bushey Heath and North Bushey.	<i>The Green Belt Assessment uses the illustrative features in the PPG to assess all purposes. For purpose B south and west of Radlett, it has been judged that there would be no loss of visual separation between towns for the settlements in question.</i>
Green Belt/grey belt	Green Belt/grey belt	Opposition to the approach in the Green Belt Assessment to assessing the contribution to purpose b) as this is too narrow and contrary to national policy and guidance as it relegates ideas of visual separation and perceived separation to secondary considerations.	<i>The Council agrees that the existence of villages between towns is a consideration for purpose B, although there is no dispute that the merging of towns and villages in their own right is not a consideration for purpose B. The Council also agrees that perceived separation is a consideration in purpose B. Both considerations have been taken into account within the purpose B assessment, and this is outlined in the methodology contained within section 2.5 of the Green Belt Assessment.</i>
Green Belt/grey belt	Green Belt/grey belt	Opposition to the conclusions of the Green Belt Assessment shown in Figure 3.5 in terms of the land shown as grey belt to the north west, north and east of Radlett.	<i>This land is assessed as grey belt according to the application of the Government's definition.</i>
Green Belt/grey belt	Green Belt/grey belt	Opposition to the definition of 'provisional grey belt' and the description of land shown on Figure 3.3 as 'Potentially provides a strong reason for refusing or restricting development with possibility of mitigation'	<i>The term provisional grey belt is used when an NPPF footnote 7 constraint is present or adjacent, but where it is impossible to judge whether that would provide a strong reason for refusing or restricting development in advance of their being a development proposal to judge against.</i>
Green Belt/grey belt	Green Belt/grey belt	Support for Green Belt assessment methodology / conclusions	<i>The Council welcomes support for the Hertsmere Green Belt assessment.</i>
Green Belt/grey belt	Green Belt/grey belt	Support for Green Belt release in this area	<i>The Council welcomes support for its approach. The Council acknowledges that, given the extent of Green Belt designation in Hertsmere and the development needs, particularly housing need, to be met, some Green Belt release is necessary to deliver sustainable development. The Plan follows the approach set out in the NPPF, prioritising brownfield land and optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated.</i>

Theme	Sub-Theme / Issue	Summary	Response
Green Belt/grey belt	Green Belt/grey belt	General concern that more sites are proposed in the Green Belt than on brownfield.	<i>The Plan seeks to minimise Green Belt loss through prioritising brownfield land, optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated. However, given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is necessary. The amount of brownfield land which has been put forward for development, and which is deemed to be available, suitable and achievable for development is insufficient to meet identified need for housing and employment land, even if densities are optimised. Therefore, Green Belt land has been proposed to be released to meet remaining need, where possible in line with the approach as set out in the NPPF and Planning Practice Guidance.</i>
Green Belt/grey belt	Green Belt/grey belt	General concern about the release of Green Belt.	<i>The Council's spatial strategy seeks to minimise Green Belt loss through prioritising brownfield land, optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated. However, given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is necessary. The Plan follows the approach set out in NPPF Chapter 13 on protecting Green Belt land.</i>
Green Belt/grey belt	Green Belt/grey belt	Recommendation for the methodology of the Green Belt Assessment to take into consideration the methodology of neighbouring authorities' assessments, to avoid inconsistencies where land parcels relate closely to neighbouring Green Belts.	<i>It was necessary for the Hertsmere Green Belt Assessment to consider small amounts of land outside Hertsmere's boundary as assessment areas need to be drawn to the next physical boundary. This is not attempting to define Enfield's position on Green Belt /grey belt and there is no suggestion that London Borough of Enfield Council should use Hertsmere's evidence base for their own Local Plan. Hertsmere Borough Council will continue to seek discussions on potential sites near to the shared boundary as a part of maintaining effective cooperation on both authorities' Local Plans.</i>
Green Belt/grey belt	Green Belt/grey belt	Concern about the release of Green Belt for the development of large-scale solar and energy infrastructure.	<i>The draft Local Plan does not propose the release of Green Belt land for the development of large scale solar and energy infrastructure. The release of Green Belt land for this type of development would be for the determination of a planning application, which would be determined in accordance with the development plan. The draft Local Plan will set the framework for the determination planning applications for energy infrastructure in Policy SD6: Energy Infrastructure.</i>
Green Belt/grey belt	Green Belt/grey belt	Concern over the way that the GBA conclusions have been applied to site selection.	<i>A stage 2 Green Belt Assessment has been undertaken to contribute towards the site selection process. Green Belt considerations have been weighed against other constraints and opportunities when considering a site for allocation in the draft Local Plan.</i>
Green Belt/grey belt	Green Belt/grey belt	Recommendation for an exemption to Policy H10 for sites that constitute previously developed land and/or grey belt as defined by the NPPF; benefit from an extant planning consent; are on the Brownfield Land Register; and/or are allocated in the development plan	<i>The Council acknowledges that there will be some exemptions to requirements of H10, however this purpose of the policy is to allow small scale housing development that contribute towards meeting the Borough's local housing needs. National policy exemptions such as land identified as grey belt through the determination process (which constitutes previously developed land and land with extant planning permission) will still apply for applications made to develop sites in the Green Belt.</i>
Green Belt/grey belt	Green Belt/grey belt	Site should be classified as full grey belt rather than provisional	<i>Provisional grey belt is where there is a footnote 7 constraint present or adjacent that could possibly be addressed in the design process, to be judged when proposals are submitted.</i>

Theme	Sub-Theme / Issue	Summary	Response
Green Belt/grey belt	Green Belt/grey belt	Suggestion that green belt land should be maintained and cannot qualify as grey belt	<i>The Draft Local Plan has undertaken a comprehensive Green Belt Assessment to evaluate the contribution that different Green Belt parcels make to the five Green Belt purposes, to identify areas of land that make weaker contributions and may be suitable for release to meet development needs where exceptional circumstances exist, and to inform decisions on whether any Green Belt land meets the emerging definition of grey belt and could be prioritised for development in accordance with the draft NPPF 2025. The Council will review the evidence base including the Green Belt Assessment to ensure that any proposed Green Belt releases are fully justified by exceptional circumstances, make the weakest contribution to Green Belt purposes, represent the most sustainable options for meeting development needs, and minimise harm to the overall extent and integrity of the Green Belt. The Council will ensure that the Regulation 19 Publication version of the Local Plan demonstrates a robust and justified approach to Green Belt that protects land serving important Green Belt functions whilst making necessary provision for development needs where exceptional circumstances exist and in accordance with national policy.</i>
Green Belt/grey belt	Green Belt/grey belt	Concern that designation of grey belt land is not consistent with national policy and should not be allowed	<i>The Draft Local Plan has undertaken a comprehensive Green Belt Assessment to evaluate the contribution that different Green Belt parcels make to the five Green Belt purposes, to identify areas of land that make weaker contributions and may be suitable for release to meet development needs where exceptional circumstances exist, and to inform decisions on whether any Green Belt land meets the emerging definition of grey belt and could be prioritised for development in accordance with the draft NPPF 2025. The Council will review the evidence base including the Green Belt Assessment to ensure that any proposed Green Belt releases are fully justified by exceptional circumstances, make the weakest contribution to Green Belt purposes, represent the most sustainable options for meeting development needs, and minimise harm to the overall extent and integrity of the Green Belt. The Council will ensure that the Regulation 19 Publication version of the Local Plan demonstrates a robust and justified approach to Green Belt that protects land serving important Green Belt functions whilst making necessary provision for development needs where exceptional circumstances exist and in accordance with national policy.</i>
Green Belt/grey belt	Green Belt/grey belt	Support for alternative means to meet housing need following examination of available brownfield sites to prevent loss of green belt land	<i>The Council recognises that substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs. The Council has undertaken a comprehensive Strategic Housing and Economic Land Availability Assessment (SHELAA) to identify all available, suitable, and achievable sites including brownfield land, underutilised urban sites, and sites within existing settlements, has prioritised the allocation of such sites to meet housing need, has explored opportunities to increase housing density, optimise site capacity, support residential conversions and changes of use, and promote urban regeneration, and has only considered Green Belt release where exceptional circumstances exist due to the inability of brownfield and urban sites alone to meet the objectively assessed housing need calculated using the Government's standard method.</i>

Theme	Sub-Theme / Issue	Summary	Response
Green Belt /grey belt	Green Belt /grey belt	Preference for building on 'grey belt' land rather than open countryside / farmed land	<i>Local Plan policies and allocations are based on national policy and guidance on green belt and grey belt and support building on green belt land only under specific conditions. The Green Belt Assessment supporting the Local Plan seeks to identify grey built and assess the appropriateness of development on it. Where grey belt is identified, it does not automatically follow that it should be allocated for development, released from the Green Belt or for development proposals to be approved in all circumstances. Appropriateness for development will be considered in the round against other evidence. For green belt land not considered as grey belt, national protection of green belt land remains.</i>
Heritage	Conservation Areas	Concern over the impact of development on conservation areas and their setting	<i>The Council recognises that conservation areas are designated heritage assets of special architectural or historic interest, and that development must conserve and enhance the significance of conservation areas and their settings, avoid harm to heritage significance, and ensure that proposals are sympathetic to local character, scale, materials, and townscape quality, in accordance with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Policies HE1 (Hertsmere's Historic Environment), HE2 (Designated Heritage Assets) and HE3 (Non-Designated Heritage Assets) require development to conserve and where possible enhance the significance of heritage assets including conservation areas and their settings, be informed by Heritage Impact Assessments where appropriate, respect the character, appearance, scale, massing, materials, and details of the conservation area, preserve or enhance key views, streetscape, and landscape setting, and avoid harm to heritage significance unless clear and convincing justification is provided and public benefits outweigh the harm. The Council is committed to ensuring that all development proposals affecting conservation areas or their settings are subject to careful assessment in consultation with the Council's Conservation Officer and Historic England where appropriate, that site allocations and policies appropriately address heritage impacts, and that high-quality, heritage-sensitive design is secured to preserve and enhance the special character and appearance of Hertsmere's conservation areas.</i>
Heritage	Heritage Impact Assessments	Recommendation that HIAs for proposed allocations should be completed for Regulation 19 to inform site assessment, selection and site capacity testing, to provide justification for proposed allocations, and to identify any site-specific criteria required for allocation policies	<i>The Draft Local Plan candidate site policies identify where Heritage Impact Assessments or archaeological assessments will be required at the planning application stage and include site-specific requirements to conserve and enhance heritage assets and their settings. The Council will engage with Historic England, the Council's Conservation Officer, and other heritage stakeholders to determine which allocations would benefit from Heritage Impact Assessments prior to Regulation 19, ensure that the evidence base robustly justifies the proposed allocations, and incorporate appropriate heritage protection and enhancement requirements into site allocation policies to safeguard Hertsmere's heritage assets.</i>
Heritage	Heritage Impact Assessments	Site requires a Heritage Impact Assessment (HIA) to assess the potential effects of development on the significance of heritage assets and to inform appropriate mitigation through the design and layout of the site. Any necessary mitigation and enhancement measures identified should be secured through the site-specific policy wording.	The Council will screen for potential heritage impacts on site allocations, carrying out HIA on all sites where potential impacts are identified. HIA will inform allocation policies on mitigation requirements.

Theme	Sub-Theme / Issue	Summary	Response
Heritage	Listed buildings	Concern over the impact of development on listed buildings and their setting	<i>The Plan seeks to minimise the impact of development on listed buildings and their setting. Planning policies within the Local Plan will conserve and enhance Hertsmere's historic environment and ensure that proposals for development that affects a heritage asset or its setting will be supported by a proportionate Heritage Statement and proposals will be assessed in accordance with legislation, national policy and the development plan, having regard to the significance of the asset and the scale of any harm or loss. Substantial harm to, or total loss of significance of, a designated heritage asset will not be supported unless the harm or loss is necessary to achieve substantial public benefits that outweigh it, or the relevant tests in national policy are met.</i>
Heritage	Other heritage assets	Concern over the impact of development on heritage assets other than listed buildings and conservation areas	<i>The Plan seeks to minimise the impact of development on non-designated heritage assets and their setting. The Council will support the identification of additional non-designated heritage assets through local listing, neighbourhood planning, conservation area appraisal, development management and other evidence-based processes. Where a proposal would directly or indirectly harm or result in the loss of significance of a non-designated heritage asset, a balanced judgement will be made having regard to the scale of harm or loss, the significance of the asset and the public benefits of the proposal.</i>
Heritage	Other heritage assets	Recommendation that the village of Elstree is protected to prevent harming the historic character.	<i>The Draft Local Plan includes proposed policies on the historic environment Policies HE1 (Hertsmere's Historic Environment), HE2 (Designated Heritage Assets) and HE3 (Non-Designated Heritage Assets) require development to sustain and enhance the significance of heritage assets and their settings and preserve and enhance the character and appearance of conservation areas including Elstree Conservation Area. Site allocations within or adjacent to Elstree will be required to demonstrate through Heritage Impact Assessments and conservation area appraisals that development would preserve or enhance the special character, appearance, and historic significance of the village. The Council will ensure that the Regulation 19 Publication version of the Local Plan includes policies and site allocation requirements that provide strong protection for Elstree's historic character, conservation area, listed buildings, locally listed buildings, archaeological heritage, and distinctive village identity, ensuring that development in and around Elstree is sensitively designed and appropriately scaled to conserve and enhance the village's special heritage significance and character.</i>
Housing	Housing need	Concern over lack of clarity over housing targets, housing requirements and housing need	<i>The Plan will seek to clarify the definition of housing targets, housing requirement and housing need. The housing requirement is the number of homes to be delivered each year by the Local Plan, and the housing need is the minimum number of homes needed in an area and is calculated using the Standard Method. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from assessing land availability, establishing a housing requirement figure and preparing policies to address this such as site allocations in line with the Planning Practice Guidance.</i>

Theme	Sub-Theme / Issue	Summary	Response
Housing	Housing need	Concern that affordable housing is not affordable in reality.	The Council is aware that it is still the case that not everyone is able to access affordable housing that is affordable and within their means. The Plan will define what is meant by genuinely affordable housing in the Hertsmere context, and how it will be the focus for delivery. In the Hertsmere context, "genuinely affordable housing" means housing that is available at social rent levels. All other housing products below market levels, whether for sale or rent, are defined as intermediate housing and should not be conflated with genuinely affordable housing.
Housing	General opinion / view	Concern that Hertsmere cannot accommodate more housing.	The Council recognises that it has a statutory duty under the Planning and Compulsory Purchase Act 2004 and the National Planning Policy Framework to plan positively to meet objectively assessed housing needs. The Draft Local Plan housing requirement is based on the standard method calculation which takes account of projected household growth and affordability pressures. The Council has undertaken a comprehensive Housing and Economic Land Availability Assessment (HELAA) to identify all available, suitable, and achievable sites, explored opportunities to maximise housing delivery on brownfield land, underutilised urban sites, sites within existing settlements, and through increased densities and optimisation of site capacity. Hertsmere, will ensure that allocated sites are supported by adequate infrastructure, services, and environmental mitigation to accommodate growth sustainably, and will ensure that the Regulation 19 Publication version of the Local Plan is supported by robust evidence demonstrating that the housing requirement is based on the appropriate methodology, that the spatial strategy and site allocations represent the most sustainable and appropriate approach to meeting housing needs having considered reasonable alternatives, and that development can be delivered in a manner that is consistent with environmental, heritage, infrastructure, and community objectives and contributes to creating sustainable, inclusive, and well-designed communities across Hertsmere.
Housing	General opinion / view	Support for the housing policies within the Plan	The Council welcomes support for the housing policies within the draft Local Plan.
Housing	Housing need	Objection to acceptance of payment in lieu instead of onsite delivery of affordable housing	The Plan will emphasise on on-site delivery of affordable housing on major sites, unless exceptional circumstances are demonstrated. The alternative, of offering a cascade approach would only be used where it is not possible to deliver on-site affordable housing, prioritising off-site delivery on an alternative site, or a final option for a payment in lieu of exceptional circumstances only.
Housing	Housing need	Agreement that the standard method is the starting point for calculating housing need	<i>The Standard Method is the starting point for calculating the Council's housing requirement as required by NPPF and Planning Practice Guidance. The Council has used the Standard Method to calculate its housing need and this is set out in the Hertsmere LHNA Update 2025.</i>

Theme	Sub-Theme / Issue	Summary	Response
Housing	Housing need	Concern on / opposition to the results of government's standard method for determining housing need	<i>The Government's Standard method is the first step in calculating the housing requirement for the Plan. The Council has set out how the housing need for the Hertsmere Local Plan has been calculated in the Hertsmere LHNA Update (2025). The housing requirement for the Plan will be set out in Chapter 3 of the draft Local Plan. The housing requirement has been calculated to ensure that the Local Plan seeks to meet all of the Borough's local housing needs, in line with the requirements of the National Planning Policy Framework.</i>
Housing	Housing need	Support for a higher housing target / requirements to meet OAN in full	<i>The Council welcomes support for higher housing targets that meet the Borough's Objectively Assessed Need (OAN) in full.</i>
Housing	Housing need	Support for delivery of affordable housing to meet need	<i>The Council welcomes support for the delivery of affordable housing to meet local needs.</i>
Housing	Housing need	Concern regarding developers claiming that their scheme is not sufficiently financially viable and thus cannot deliver agreed percentage of affordable housing after consent has been granted, seeking penalties for developers or Compulsory Purchase of sites in such circumstances.	The Plan will reflect development viability through its Whole Plan Viability Assessment, identifying what percentage of affordable provision can be supported without endangering delivery of new homes. In line with the NPPF, where our policies have set out the contributions expected from development, planning applications that comply with them will be assumed to be viable and it will be up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. Where a developer seeks to alter affordable housing commitments after planning permission is granted, this will have to happen through a viability review, in line with national policy and guidance. Penalties are not part of this nationally agreed process, as it is important to ensure sites remain deliverable if circumstances change. In line with the NPPF and the Planning and Compulsory Purchase Act, HBC as a local authority can use compulsory purchase powers, where appropriate and where this can help to bring more land forward for meeting development needs and/or secure better development outcomes but needs to be mindful of the financial implications.
Housing	Housing need	Local housing needs of specific groups to be explored in housing need evidence should include consideration of housing need of local key workers (e.g. NHS staff)	<i>The South West Hertfordshire Local Housing Needs Assessment 2024 assesses the needs of essential workers (as defined in Annex 2 of the NPPF) which identifies that 17.7% of Hertsmere's residents are essential workers. It identifies that on the basis of incomes essential local workers could be a potential target for affordable home ownership products. The affordable housing policy within the draft Local Plan will set out a requirement to for the split of affordable housing between social rent, affordable rent and affordable home ownership. This will seek to meet the needs of essential workers (including NHS staff) across Hertsmere.</i>

Theme	Sub-Theme / Issue	Summary	Response
Housing	Housing need	Concern over affordable housing requirements affecting viability	<i>The affordable housing requirements recommended in the Hertsmere LHNA Update 2025 are subject to viability testing by the Whole Plan Viability Assessment, which identifies what percentage of affordable housing provision on new development sites can be supporting without impacting the viability of housing developments.</i>
Housing	Housing need	Affordable housing requirement is not justified when compared with the evidence in the LHNA and should be higher	<i>The affordable housing requirement in the draft Local Plan has been determined through consideration of affordable housing need within Hertsmere, which is set out in the Hertsmere LHNA Update 2025, and the results of the Whole Plan Viability Assessment 2026.</i>
Housing	Housing need	Recommendation that, in accordance with the NPPF, identifying and addressing the health requirements of existing and new development should be based on identified needs in the joint strategic needs assessment and support delivery of relevant health strategies, such as the health and wellbeing board's joint local health and wellbeing strategy and the integrated care board's infrastructure plan.	<i>HCC is responsible for public health functions and are currently identifying a new suite of Joint Strategic Needs Assessments for Hertfordshire. The Infrastructure Delivery Plan supporting the Local Plan has been informed by ongoing engagement with HCC and the Integrated Care Board and will identify health infrastructure requirements based on the JSNA, Joint Local Health and Wellbeing Strategy and the ICB's infrastructure plan.</i>
Housing	Housing need	Concern over the cost / affordability of housing	<i>The SW Herts LHNA 2024 assesses affordability, with the AECOM LHNA Update 2025 providing more detail on the affordability of affordable rented tenures and the cost of housing to rent and purchase in the sub areas</i>
Housing	Housing need	Support for delivery of family housing to meet need	<i>The Council welcomes support for the delivery of family housing to meet needs. The SW Herts LHNA 2024 models the mix of housing for Hertsmere over the plan period. This supports the delivery of family-sized housing, with 96% of market housing recommended as 2+ bedroom, 82% of affordable home ownership properties as 2+ bedroom, and 77% of general needs affordable rented housing.</i>
Housing	Housing need	Support for delivery of downsizer / rightsizer housing to meet need	<i>The Council welcomes support for the delivery of downsizer/rightsizer housing.</i>
Housing	Housing need	Support for Traveller accommodation to meet need	<i>The Council welcomes support for the delivery of gypsy and traveller accommodation to meet the identified needs of the traveller community. The identified need for gypsy and travellers is outlined in the Hertsmere Gypsy and Traveller Accommodation Assessment (GTAA) 2026. Which Identified a need for 132 gypsies and traveller pitches across the plan period.</i>

Theme	Sub-Theme / Issue	Summary	Response
Housing	Housing need	Recommendation for supporting text of Policy H1 to state that the standard method is the starting point for calculating the Council's housing need, to ensure that the Local Plan is positively prepared and capable of meeting identified needs in full, and to indicate how this will be achieved.	<i>The Government's Standard method is the first step in calculating the housing requirement for the Plan. The Council has set out how the housing need for the Hertsmere Local Plan has been calculated in the Hertsmere LHNA Update (2025). The housing requirement for the Plan will be set out in Chapter 3 of the draft Local Plan. The housing requirement has been calculated to ensure that the Local Plan seeks to meet all of the Borough's local housing needs, in line with the requirements of the National Planning Policy Framework.</i>
Housing	Housing need	Concern on / opposition to provision of Traveller accommodation	<i>The Council has a statutory duty under the Housing Act 1985 to meet the accommodation needs of gypsies and travellers in their area and must maintain a delivery supply of sites for pitches. The Council will set out in the draft Local Plan how they intend to meet the needs of gypsies and travellers identified in the GTAA 2026.</i>
Housing	Housing need	Concern on / opposition to the provision of affordable / social housing	<i>The Council has a statutory duty to meet the needs of local area, and this includes the need for affordable homes and social housing. The Plan proposes to deliver a 80% social rent and 20% affordable home ownership split of affordable housing to meet the needs identified in the LHNA Update 2025.</i>
Housing	Housing need	Concern on / opposition to the provision of Houses in Multiple Occupation (HMOs)	<i>Households eligible only for the 'shared accommodation' rate of Local Housing Allowance (generally single person households aged under 35) are likely to have limited options in the rental market, with Houses in Multiple Occupation (HMOs) an important option for often younger, single, low income households.</i> <i>As of December 2025, the HMO Register for Hertsmere recorded 174 licensed HMOs, with over half of these (57.5%, or 100 properties) located in Potters Bar. A further 55 (31.6%) were located in Borehamwood, with 12 (6.9%) in Bushey, 4 (2.3%). This kind of geographical spread is not unusual due to access to services and generally larger private rented sectors in larger settlements. This relates only to licensed HMOs with 5 or more bedrooms. There is likely to be a further, often larger, stock of smaller non-licensed HMOs, which it is not within the scope of this study to explore the scale of. The Council may wish to explore this further if it is a key concern, including the scale, geographical concentration, impacts, and potential management options.</i> <i>Numerous market segments might be expected to live in HMOs, including university students, young professionals (often with pre-existing relationships), independent working individuals (contracted separately with the landlord), benefit-funded individuals, vulnerable people using HMOs as a transitional arrangement or placement, and asylum seekers living in HMOs on a temporary or long-term basis. As there is no university in Hertsmere it is likely that students are a limited group using HMOs in the borough, with the other client groups likely all represented within the occupancy mix.</i>

Theme	Sub-Theme / Issue	Summary	Response
Housing	Housing need	Concern that new housing should be for existing residents of the Borough and not be provided to accommodate overspill / immigration from elsewhere	HBC's Local Plan, in line with national policy and guidance, has to plan to meet its housing requirement. A local authority's housing requirement is based on identified housing land supply and the standard method housing need, which in turn is founded on a baseline of local housing stock and affordability of housing. Housing affordability is taken into account to ensure homes are built where people want to live. People may want to live in an area in which they do not reside currently, for example to be near to work, but be unable to find appropriate accommodation that they can afford. People who are allowed to reside in the UK are free to rent or buy a home where they choose. As household numbers naturally grow through demographic change, and as more people wish to make their home in Hertsmere, this is reflected in local house prices and rents and thus affordability.
Housing	Housing need	Support for seeking to meet the needs of vulnerable residents	<i>The need for housing for vulnerable residents is outlined in the South West Hertfordshire Local Housing Needs Assessment 2024 and policies within the draft Local Plan will seek to meet this need through the provision of accommodation for older people and supported and specialised accommodation.</i>
Housing	Housing need	Concern over underoccupied / empty / second homes	<i>The Council acknowledges the concerns about empty and second homes, based on the 2021 Census as an estimate, there were 2,243 empty dwellings in Hertsmere. This equates to 5.0% of the housing stock at the time, as compared to the rate across Hertfordshire (4.2%), and 6.0% nationally. The Council does not consider this issue to be a matter than needs to be addressed by this Local Plan but if the percentage of second/empty homes was to increase across the plan period then this would be an issue for the next Local Plan.</i>
Housing	Housing need	Council should consider increasing housing requirement to help deliver unmet need arising from neighbouring authorities	<i>Through duty to cooperate discussions, the Council has not been made aware of any unmet needs arising for neighbouring authorities. The Council understands that neighbouring authorities are seeking to meet their local housing needs through their respective local plans.</i>
Housing	Housing need	Concern on / opposition to HBC's approach to setting a housing requirement	HBC's Local Plan, in line with national policy and guidance, has to plan to meet its housing requirement, to be found legally 'sound' at examination. The requirement is based on identified housing land supply, associated constraints, and the standard method housing need, which in turn is founded on a baseline of local housing stock and affordability of housing. Housing stock provides a stable and predictable baseline that ensures all areas, as a minimum, are contributing a share to meet the national total need for housing, proportionate to the size of their current housing market. Consideration of affordability is included to ensure homes are built where people wish to live and are able to find work.
Housing	Housing need	Support for a higher housing requirement to provide a larger supply buffer as contingency to ensure that need is met	<i>The housing requirement for the Local Plan includes a 20% buffer as required by paragraph 73(b) of the NPPF, due to the results of the Housing Delivery Test. This national policy mechanism has been applied to ensure that sufficient housing is delivered in the first 5 years of the plan period to meet local housing needs.</i>
Housing	Housing need	Further clarity requested on the definition of 'genuinely affordable housing'.	Policy at Regulation 19 will define what is meant by genuinely affordable housing in the Hertsmere context, and how it will be the focus for delivery.

Theme	Sub-Theme / Issue	Summary	Response
Housing	Housing need	Concern that the Plan does not provide sufficient evidence that HBC has explored all reasonable options for meeting housing need within the Borough	<i>The Interim Sustainability Appraisal (2026) defines the growth scenarios and tests different spatial options for delivering housing growth across the Borough. The results of the assessment have been considered in conjunction with the result of the Green Belt Assessment (2026) and Settlement Hierarchy and Services Paper (2026) to determine the most appropriate spatial strategy for the draft Local Plan.</i>
Housing	Housing supply	Opposition to the approach taken to small housing sites in the Plan, seeming to trade a higher quantum/density of housing over design quality and sustainability.	<i>The Council will maximise the opportunities for housing from small urban sites in line with the Spatial Strategy and to ensure a mix of development sites in its housing supply. Design and sustainability policies within the Plan will ensure that high quality and sustainability is maximised and that housing delivery does not compromise design quality. Appropriate densities will be secured in line with the requirements of the NPPF to ensure the effective use of land.</i>
Housing	Housing supply	Recommendation for mechanism to be put in place for additional sites to be supported if housing delivery position in the Borough changes in future, to ensure that housing need can be met, as long as sites are consistent with the plan's spatial vision and strategy.	<i>The Council does not deem it necessary to include such a mechanism in the Local Plan, as the Council is seeking to meet its annual housing requirement, as outlined in the housing trajectory and to maintain a positive housing land support position for the duration of the plan period, in line with national policy, guidance and legislation.</i>
Housing	Housing supply	Recommendation that Policy H2 is amended to provide flexibility to allow windfall and grey belt sites to come forward where they can demonstrably satisfy national policy and the contributions they make to the identified housing land supply. It is essential that the Council deliver a spatial strategy with sufficient flexibility to ensure that this policy is implemented effectively.	<i>The Council deems its existing spatial strategy to be sufficiently flexible and comprehensive to meet identified needs. Furthermore, additional provisions already exist within the National Planning Policy Framework to approve development proposals that accord with both an up to date development plan and the decision-making policies in the Framework, in line with the presumption in favour of sustainable development.</i>
Housing	Housing supply	Concerns around how realistic the indicated delivery trajectory of proposed housing development is	<i>The Plan's housing trajectory has been prepared using information on delivery provided by promoters and land owners for candidate sites. To provide certainty over the housing trajectory the Council will undertake further engagement which landowners, site promoters and developers during the Regulation 19 consultation to provide a robust evidence base for housing supply across the plan period.</i>
Housing	Housing supply	Concern around past Council performance in delivering housing creating need for higher current housing requirement	<i>The Council's delivery of housing over the past 3 years has contributed to the calculation of the housing requirement for the Plan. The results of the Housing Delivery Test have resulted in a 20% buffer being added to the first 3 years of the plan to ensure that sufficient housing is delivered to meet local housing needs. The Council is seeking a stepped housing trajectory in the first 5 years of the plan period to ensure that housing delivery can be scaled up during this period.</i>
Housing	Housing supply	Support for strengthening the housing trajectory with an additional supply of small sites to ensure flexibility	<i>The Council is seeking to meet the requirements of paragraph 73 of the NPPF for 10% of the Plan's housing requirement to be delivered on sites no larger than one hectare. The Council is proposing a regeneration focused Spatial Strategy to ensure a sufficient supply of deliverable sites across the plan period.</i>

Theme	Sub-Theme / Issue	Summary	Response
Housing	Housing supply	Concerns around the general sustainability of proposed housing development	<i>The Regulation 19 Local Plan will propose design requirements for new housing development to require a high-quality standard to meet the diverse needs of Hertsmere's residents. Sustainability policies will set sustainability requirements to respond to the climate and ecological emergency, reduce water and energy consumption and promote sustainable construction practices.</i>
Housing	Housing supply	Concern for Council's housing land supply position	<i>The draft Local Plan seeks to improve the Council's housing land supply position from the point of adoption to avoid speculative development across Hertsmere. The Council is seeking a stepped housing trajectory in the first 5 years of the plan period to ensure that housing delivery can be scaled up during this period and the Housing Delivery Test results can be improved, which will contribute to a better housing land supply position for the Borough.</i>
Housing	Housing supply	Concern for/opposition to the approach within the housing policies of the Plan	<i>The draft Local Plan provides a positive framework for the delivery of much needed housing across Hertsmere while protecting the historic and natural environment. The Council is seeking to deliver a range of development sites across the Borough to meet local housing needs as well as securing a high quality of design from new housing developments. The housing policies within the Local Plan aim to deliver a range of housing types to meet the needs of all the Borough's residents, including the needs of older people, supported and specialist accommodation, gypsy and travellers, self and custom-build housing and affordable homes.</i>
Housing	Housing supply	The inclusion of windfall sites in the plan provides an opportunity to reduce sites in and around main settlements.	<i>The draft Local Plan allocates a sufficient number of new housing sites to meet local housing needs. While the Council recognises that housing can be delivered through windfall development, historically windfall development has contributed a very modest amount towards housing delivery. The Council is therefore not seeking to rely on windfall sites to meet its housing requirement.</i>
Housing	Housing supply	General concern that the housing numbers proposed at Bowmans Cross have been under-estimated and that this will cause the loss of Radlett's Green Belt to deliver homes to meet need.	<i>The Council is seeking to determine an appropriate number of homes to be delivered at Bowmans Cross through engagement with the land promoter, statutory bodies and Council officers in line with the draft Local Plan's Spatial Strategy. The Regulation 19 draft Local Plan will identify the number of homes to be delivered at Bowmans Cross within the plan period, however the delivery of the new settlement will extend beyond the plan period and the delivery of later phases of the development will be a consideration for the next Local Plan.</i>
Housing	Housing supply	Recommendation for Hertsmere to reduce the housing requirement to around 11,260 across the borough, and to 4,755 in Borehamwood.	<i>The Council have developed the draft Local Plan 'housing requirement and Spatial Strategy taking into consideration a range of technical evidence and considers the housing requirement, the distribution of housing and the Spatial Strategy to be effective, justified and consistent with national policy. The proposed number of homes at Borehamwood is consistent with the Spatial Strategy and settlement hierarchy and has been informed by the Settlement Hierarchy and Services Paper (2026).</i>
Housing	Housing supply	Supportive of the delivery of self and custom build homes	<i>The Council welcomes support for the delivery of self and custom-build housing.</i>

Theme	Sub-Theme / Issue	Summary	Response
Housing	Housing supply	Recommendation that Regulation 19 Plan should include similar text to 2021 Regulation 18 consultation in relation to nomination rights for SADC and to acknowledge that the proportion of nomination rights for SADC agreed in due course will be significant.	<i>Nominations rights for affordable housing are primarily treated as part of the local authority's Housing Strategy, rather than a matter governed directly by the Local Plan. Councils seeking to nominate tenants to affordable housing in another local authority area follow established procedures grounded in statutory guidance, local allocation schemes, and formal agreements with Registered Providers (RPs). Cross-borough nominations are often formalised through policies or London-wide frameworks (e.g., London Affordable Housing Nominations Policy) and should be in line with the Hertsmere Housing Allocations Policy (2025).</i>
Housing	Housing supply	Concern that if the Council does not allocate sufficient deliverable sites to meet the housing requirement in the early part of the plan period there is a risk that the housing delivery test will be failed and the presumption in favour of sustainable development (para 11d) will still be engaged.	<i>The draft Local Plan seeks to improve the Council's housing land supply position from the point of adoption to avoid speculative development across Hertsmere. The Council is seeking a stepped housing trajectory in the first 5 years of the plan period to ensure that housing delivery can be scaled up during this period and the Housing Delivery Test results can be improved, which will contribute to a better housing land supply position for the Borough.</i>
Housing	Housing supply	Concern over how the Council have calculated their housing land supply and housing trajectory to meet the housing requirement stated in the Plan.	<i>The Plan's housing trajectory has been prepared using information on delivery provided by promoters and land owners for candidate sites. To provide certainty over the housing trajectory the Council will undertake further engagement which landowners, site promoters and developers during the Regulation 19 consultation to provide a robust evidence base for housing supply across the plan period.</i>
Housing	Housing supply	Recommendation for Policy H4 to allow viability to be considered in specific circumstances, so that the policy remains effective and development can still come forward, and to allow for a cascade mechanism to be included in any S106 agreement.	<i>The National Planning Policy Framework sufficiently outlines provisions as regards scheme specific viability assessments.</i>
Housing	Housing supply	Objection to policy H10 on basis that the additional Green Belt policy is not necessary or justified and risks duplicating national policy requirements. This is inconsistent with the Government's intention to streamline local plans and avoid unnecessary repetition of national policy.	<i>The Council will take this recommendation into account, alongside the new National Planning Policy Framework published in its final version after the conclusion of this Regulation 18 consultation, alongside consideration of other policies within the Plan for which the national policy and / or legislative context may have recently changed.</i>
Housing	Housing need	Support for higher housing capacity on specific site.	<i>The Council welcomes support for higher housing capacities on specific sites. The Local Plan will allocate sites for housing development to help support meeting the Borough's housing needs, with capacities based on comprehensive site assessments, including consideration of site constraints and achievable densities informed by local character, design principles, sustainable development objectives, and viability considerations. The Council will consider evidence submitted for specific sites at Regulation 18 to assess whether policy should be updated to indicate the potential for higher housing numbers, whilst still ensuring the delivery of sustainable, well-designed development that meets policy requirements.</i>

Theme	Sub-Theme / Issue	Summary	Response
Housing	Housing supply	Support for housing supply target method	<i>The Regulation 19 Local Plan housing requirement is based on the Government's standard method as set out in national planning guidance. The method uses existing housing stock as its baseline and applies an affordability adjustment. The Regulation 19 Local Plan sets a housing requirement of 975 dwellings per annum and identifies housing supply through the Housing and Employment Land Availability Assessment, site allocations and housing trajectory. Strategic cross-boundary matters continue to be addressed through ongoing cooperation with neighbouring authorities.</i>
Housing	Housing need	Neighbouring authority does not have capacity to assist HBC in meeting any shortfall identified	<i>The Council confirm that the Draft Local Plan spatial strategy has been developed on the basis that Hertsmere's housing needs will be met in full within the borough through sustainable development that balances meeting objectively assessed housing needs with appropriate protection for environmental assets including the Green Belt. The Council will continue to engage constructively with neighbouring authorities on cross-boundary strategic matters.</i>
Infrastructure (other than transport)	Delivery / Funding	Concerns that proposed developer contributions to support infrastructure investment are too high / would threaten viability	The Draft Local Plan has been subject to comprehensive viability testing through a Whole Plan Viability Assessment, which demonstrates that the policy requirements and infrastructure contributions can be delivered whilst maintaining development viability across the borough. This approach accords with the National Planning Policy Framework (NPPF) 2024. The infrastructure requirements identified in the Infrastructure Delivery Plan are necessary to ensure sustainable development and properly support new communities, with contributions directly related to the impacts of development and necessary to make proposals acceptable in planning terms. The Council recognises that site-specific circumstances may affect viability and will work constructively with applicants where genuine viability issues are demonstrated, whilst maintaining the expectation that policy requirements should be met wherever possible. The Council remains committed to monitoring plan implementation and will consider evidence through the plan review process if requirements are genuinely preventing viable development from coming forward.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Delivery / Funding	In accordance with PPG, viability assessments should make initial assumptions that applicable developments will provide both land and funding for the construction of new infrastructure.	The Draft Local Plan's approach fully reflects this principle, with the Whole Plan Viability Assessment testing development typologies on the basis that necessary infrastructure will be delivered through a combination of on-site provision and financial contributions secured via Section 106 planning obligations and the Community Infrastructure Levy. The policy framework, including site-specific allocations, will clearly set out infrastructure requirements expected from development, providing certainty for applicants whilst ensuring that growth is supported by the necessary physical, social, and green infrastructure identified in the Infrastructure Delivery Plan. The Council will continue to work proactively with developers and infrastructure providers to ensure that infrastructure delivery is appropriately phased and integrated with development delivery, creating sustainable communities across Hertsmere.
Infrastructure (other than transport)	Delivery / Funding	Recommendation that the Local Plan should include a specific section setting out the process to determine the appropriate form of developer contributions to health infrastructure.	The Draft Local Plan establishes the proposed overall framework for infrastructure delivery through proposed Policy DM2 (Infrastructure Funding and Planning Obligations) and SC11, which sets out how development would be required to provide or contribute towards necessary infrastructure, including healthcare facilities, in accordance with the National Planning Policy Framework (NPPF) 2024. The Infrastructure Delivery Plan (IDP) supporting the Draft Local Plan has been prepared in collaboration with the Integrated Care Board and identifies healthcare infrastructure requirements arising from planned growth, including the need for expanded or new primary care facilities in specific locations. The process for determining the appropriate form and level of contributions to health infrastructure is guided by the IDP evidence and will be secured through Section 106 planning obligations on a site-specific basis. The Council will continue to work closely with the NHS and Integrated Care Board throughout the planning application process to ensure that health infrastructure requirements are properly assessed and that appropriate contributions are secured to meet the needs of growing communities.
Infrastructure (other than transport)	Delivery / Funding	Recommendation that the Council engage with the relevant Integrated Care Board (ICB) to add further detail within the Local Plan and supporting evidence base (Infrastructure Delivery Plan) regarding the process for determining the appropriate form of contribution towards the provision of healthcare infrastructure.	The Council has worked collaboratively with the ICB during the preparation of the Draft Local Plan to identify healthcare capacity constraints and infrastructure requirements, and this engagement will continue throughout the plan-making process to ensure that the evidence base remains robust and up to date. The Council recognises the importance of providing clarity on the process for determining the appropriate form of developer contributions towards healthcare infrastructure, including the methodology for calculating impacts and the circumstances in which on-site provision, off-site improvements, or financial contributions would be appropriate. The Council will work with the ICB to review and strengthen the IDP where appropriate, to include more detailed information on healthcare infrastructure requirements and the approach to securing contributions through Section 106 planning obligations.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Delivery / Funding	Concerns that proposed developer contributions to support infrastructure investment are too low and would not be sufficient to deliver the infrastructure required to support proposed growth	The Draft Local Plan is supported by a comprehensive Infrastructure Delivery Plan (IDP), which has been prepared in collaboration with key infrastructure providers including Hertfordshire County Council, the Integrated Care Board, utility companies, and other stakeholders to identify the full range of infrastructure requirements arising from planned development, assess costs, establish delivery timescales, and identify funding sources. Developer contributions secured through Section 106 planning obligations and the Community Infrastructure Levy represent a significant but not the sole source of infrastructure funding, with other sources including central government funding programmes, local authority capital programmes, and investment by statutory undertakers and service providers also contributing to delivery. The level of contributions sought from development has been carefully calibrated through the Whole Plan Viability Assessment to ensure that requirements are realistic and achievable whilst maintaining development viability, in accordance with the National Planning Policy Framework (NPPF) 2024. The Council is committed to working proactively with infrastructure providers and developers to maximise funding opportunities, prioritise critical infrastructure, and ensure efficient delivery, and will continue to monitor infrastructure delivery and funding through the plan period, updating the IDP as necessary to respond to changing circumstances and ensure that growth is properly supported by the infrastructure necessary to create sustainable, thriving communities across Hertsmere.
Infrastructure (other than transport)	Delivery / Funding	Importance of ensuring new and improved social infrastructure is delivered by (and alongside) new development.	The Draft Local Plan establishes a proposed comprehensive framework for infrastructure delivery through proposed Policy DM2 (Infrastructure Funding and Planning Obligations) and SC11, which requires development to provide or contribute towards necessary social infrastructure including education facilities, healthcare provision, community facilities, sports and recreation facilities, and public open space, in accordance with the National Planning Policy Framework (NPPF) 2024. The Infrastructure Delivery Plan (IDP) identifies specific social infrastructure requirements arising from planned growth and establishes delivery timescales to ensure that infrastructure is provided in phase with development to meet the needs of growing communities. The policy framework enables the Council to secure infrastructure delivery through planning conditions and Section 106 planning obligations, which can require both on-site provision and financial contributions, as well as phasing mechanisms to ensure that infrastructure is delivered at appropriate trigger points during the development process. Site-specific allocations include requirements for social infrastructure provision tailored to local needs and development scale, and the Council will work proactively with developers, infrastructure providers, and local communities throughout the planning application and development management process to ensure that social infrastructure is properly planned, funded, and delivered in a timely manner to support the creation of cohesive, well-served communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Delivery / Funding	Concern over level of infrastructure upgrades required to facilitate development	The Draft Local Plan is supported by a comprehensive Infrastructure Delivery Plan (IDP), which has been prepared in collaboration with key infrastructure providers to identify existing capacity constraints and the infrastructure improvements necessary to support planned growth across the borough. The infrastructure requirements identified in the IDP reflect a realistic assessment of what is needed to ensure that new development does not place unacceptable pressure on existing services and facilities, and that new and existing communities benefit from adequate infrastructure provision. The costs of necessary infrastructure upgrades will be met through a combination of developer contributions secured via Section 106 planning obligations and the Community Infrastructure Levy, central government funding programmes, local authority investment, and funding from statutory undertakers and utility companies. The Council is committed to working proactively with infrastructure providers, developers, and funding bodies to ensure that infrastructure delivery is properly coordinated and phased alongside development and will continue to monitor infrastructure capacity and delivery throughout the plan period to respond to changing circumstances and ensure that growth is supported by the infrastructure necessary.
Infrastructure (other than transport)	Delivery / Funding	Concern over timing of infrastructure upgrades required to facilitate development	The Draft Local Plan recognises that the timely delivery of infrastructure is critical to ensuring that development is sustainable and that new communities are properly supported from occupation. The Infrastructure Delivery Plan (IDP) identifies not only the infrastructure requirements arising from planned growth but also establishes indicative delivery timescales and phasing to ensure that provision is aligned with development delivery. Proposed Policy DM2 and SCI1 (Infrastructure Funding and Planning Obligations) sets out the proposed framework for securing infrastructure through Section 106 planning obligations, which can include phasing requirements and trigger points to ensure that critical infrastructure is delivered at appropriate stages during the development process, in accordance with the National Planning Policy Framework (NPPF) 2024. Site-specific allocations include requirements for infrastructure provision, and the Council will work proactively with developers, infrastructure providers, and statutory bodies throughout the planning application and development management process to agree appropriate phasing mechanisms that ensure infrastructure is delivered in advance of, or alongside, the development it serves.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	General opinion/view	General concern that existing infrastructure cannot support growth.	The Draft Local Plan has been prepared with a comprehensive understanding of existing infrastructure constraints and future requirements through the Infrastructure Delivery Plan (IDP), which has been developed in collaboration with key infrastructure providers including Hertfordshire County Council, the Integrated Care Board, utility companies, and other statutory bodies to assess current capacity across all infrastructure types and identify the improvements necessary to accommodate planned development. The Council recognises that existing infrastructure in some areas is operating at or near capacity, which is precisely why the Draft Local Plan includes robust policies to ensure that development provides or contributes towards the infrastructure improvements required to make growth sustainable, in accordance with the National Planning Policy Framework (NPPF) 2024. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the proposed framework for securing necessary infrastructure through developer contributions via Section 106 planning obligations and the Community Infrastructure Levy, ensuring that development meets its infrastructure obligations and does not place unacceptable pressure on existing services and facilities. The IDP identifies specific infrastructure projects required to support growth, including transport improvements, education facility expansions, healthcare provision enhancements, utilities upgrades, and green infrastructure delivery, with funding secured through a combination of developer contributions, government funding programmes, and investment by infrastructure providers. The Council is committed to ongoing monitoring of infrastructure capacity and delivery throughout the plan period, working proactively with partners to ensure that infrastructure provision keeps pace with development.
Infrastructure (other than transport)	Delivery / Funding	Recommendation that site specific obligations, including infrastructure requirements, should be consistent with national policy	The Council will ensure that infrastructure requirements and other planning obligations in the Plan are clearly justified by evidence, proportionate to the scale and impacts of the proposed development, necessary to mitigate specific impacts or deliver essential infrastructure arising from the development, and consistent with the tests in national policy and legislation, including the Community Infrastructure Levy (CIL) Regulations.
Infrastructure (other than transport)	General opinion/view	General support for infrastructure delivery to support growth	The Draft Local Plan recognises that timely provision of high-quality infrastructure is fundamental to creating sustainable, thriving communities. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes a comprehensive framework for securing necessary infrastructure including transport, utilities, education, healthcare, and green infrastructure, in accordance with the National Planning Policy Framework (NPPF) 2024. The Infrastructure Delivery Plan (IDP) identifies specific requirements, delivery timescales, and funding mechanisms including developer contributions via Section 106 obligations and the Community Infrastructure Levy, alongside government funding and investment by infrastructure providers. The Council is committed to working collaboratively with developers, infrastructure providers, and stakeholders to ensure infrastructure is delivered in coordination with development and will continue to monitor delivery and update the IDP to ensure growth is supported by the infrastructure necessary to deliver sustainable, inclusive communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	General opinion/view	Promotion of on-site infrastructure provision over off-site contributions	Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes that development should provide necessary infrastructure on-site where this is feasible and effective in meeting identified needs, in accordance with the National Planning Policy Framework (NPPF) 2024. Site-specific allocation policies include requirements for on-site infrastructure provision tailored to the scale and nature of development, and the Council will work proactively with developers to maximise on-site delivery wherever viable and practical. Off-site contributions will be sought where on-site provision is not feasible, where strategic infrastructure upgrades serving wider areas are required, or where pooling contributions from multiple developments enables more effective infrastructure delivery.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that environmental requirements on sites should be embedded before layouts are fixed and should be secured through enforceable mechanisms, such as an integrated green infrastructure strategy, ecological management plan, and arboricultural management framework.	Proposed Policy GI4 (Protecting and Enhancing Biodiversity, Habitats and Ecological Networks) require development to incorporate high-quality green infrastructure, deliver measurable biodiversity net gain in accordance with the Environment Act 2021, protect existing environmental assets including trees and hedgerows, and integrate sustainable drainage systems. Site-specific allocation policies require major developments to submit integrated green infrastructure strategies, ecological management plans, arboricultural impact assessments and management frameworks, and landscape strategies as part of planning applications, with long-term management and maintenance secured through planning conditions and Section 106 planning obligations. The Council will work proactively with developers and environmental partners to ensure requirements are robustly secured and effectively delivered, supporting the Draft Local Plan's commitment to environmental protection and enhancement across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Promotion of on-site infrastructure provision relating to climate change adaptation and mitigation over off-site contributions.	Proposed Policy SD1, SD2 and SD7, requires development to incorporate measures to reduce carbon emissions, enhance energy efficiency, integrate renewable and low-carbon energy generation, and incorporate nature-based solutions including sustainable drainage systems, green roofs, and tree planting. Site-specific allocation policies also require on-site delivery of green infrastructure, sustainable drainage, and biodiversity enhancement. The Council will work proactively with developers to maximise on-site delivery of climate infrastructure, ensuring development contributes to Hertsmere's transition to a low-carbon, climate-resilient future.
Infrastructure (other than transport)	Green/blue infrastructure	Support for an increase in green infrastructure to increase habitats across the borough and improve biodiversity in Hertsmere	The Council welcomes this support for increasing green infrastructure to enhance habitats and improve biodiversity across the borough. Policies GI1, Green and Blue Infrastructure Network, GI3, Local Nature Recovery Strategy, GI4, Biodiversity, Habitats and Ecological Networks, GI6, Urban Greening, Trees and Landscaping, and GI7, Open Space set out requirements for development to deliver measurable biodiversity net gain in accordance with the Environment Act 2021, protect and enhance existing habitats and wildlife corridors, and integrate high-quality green infrastructure that creates new habitats and strengthens ecological connectivity. The Council is committed to working collaboratively with developers, environmental partners, and local communities to deliver a borough-wide ecological network that supports thriving wildlife populations, enhances landscape character, and provides accessible, high-quality green spaces for all residents across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Green/blue infrastructure	Support for green infrastructure policies in the plan	The Council welcomes support for the green infrastructure policies in the Draft Local Plan. Proposed policies GI1, Green and Blue Infrastructure Network, GI3, Local Nature Recovery Strategy, GI4, Biodiversity, Habitats and Ecological Networks and supporting policies establish a comprehensive framework for protecting, enhancing, and expanding green infrastructure, requiring development to deliver biodiversity net gain, integrate high-quality green spaces, and create connected ecological networks. The Draft Local Plan recognises that green infrastructure provides multiple benefits including biodiversity enhancement, climate resilience, flood mitigation, and accessible recreation opportunities. The Council is committed to ensuring green infrastructure is embedded within development and that Hertsmere's natural environment is protected and enhanced for current and future generations.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that wording of Policy GI3 is amended as it currently implies that golf courses may be considered for release for development. This should be informed by the emerging evidence base and in particular the Playing Pitch Strategy, which current identifies a high demand for golf courses and would indicate that none of the golf courses in the borough are surplus to requirement.	The Council recognises the important recreational, health and wellbeing, biodiversity, and landscape value that golf courses provide, and notes the evidence in the Playing Pitch Strategy which identifies high demand for golf provision across Hertsmere. Proposed Policy GI3 is intended to protect sports and recreation facilities in accordance with the National Planning Policy Framework (NPPF) 2024. The policy framework ensures that golf courses and other sports facilities are safeguarded unless compelling evidence demonstrates they are genuinely surplus to requirements, taking account of current and future demand identified in the Playing Pitch Strategy. The Council is committed to protecting valuable sports and recreation facilities that contribute to healthy, active communities and the borough's green infrastructure network across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Objection to the Plan if at Regulation 19 a generic approach is taken to development of golf courses and is contrary to the findings in the Council's evidence base, as inconsistent with paragraph 104 of the NPPF.	Proposed Policy SCI3 (delivering Sports, Recreation and Play Spaces) and Policy GI3 (Open Spaces) align with the National Planning Policy Framework (NPPF) 2024 which requires robust evidence that facilities are surplus to requirements based on an up-to-date assessment of need before development is permitted. The Council's Playing Pitch Strategy identifies high demand for golf provision across Hertsmere, and this evidence will inform the application of policy to ensure golf courses are protected unless credible, site-specific evidence demonstrates they are genuinely surplus to requirements. Each proposal affecting sports and recreation facilities will be assessed on its individual merits against policy criteria and relevant evidence, and the Council is committed to protecting valuable sports and recreation facilities that contribute to healthy, active communities and the borough's green infrastructure network in accordance with national policy and the Draft Local Plan evidence base.
Infrastructure (other than transport)	Green/blue infrastructure	Concern that green infrastructure is treated as mitigation rather than as a strategic constraint that shapes the location and scale of growth.	Green infrastructure, biodiversity networks, landscape character, and environmental assets have been considered strategically throughout the plan-making process as fundamental constraints and opportunities that shape the location, scale, form, and design of development. Site allocations and policies will provide for the protection, enhancement, and expansion of multifunctional green infrastructure networks that support biodiversity, climate resilience, health and wellbeing, place-making, and sustainable communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI1 should include stronger quantitative requirements, including for five UK Infrastructure Standard-compliant trees per dwelling for major residential development and five such trees per 1,000 square metres of non-residential floorspace where appropriate and deliverable, and should cross-refer to GI5 and make clear that the amount, quality and long-term functionality of green infrastructure are matters of policy, not optional enhancements.	The Council recognises the importance of establishing clear, measurable standards to ensure development delivers high-quality green infrastructure. Proposed Policy GI1 requires development to incorporate appropriate green infrastructure including tree planting, and the Council will consider whether additional quantitative standards would provide beneficial clarity and ensure consistent delivery across the borough, recognising that site-specific constraints may affect achievability in some locations. The Council notes the recommendation for cross-referencing proposed Policy GI5 (Biodiversity Net Gain) and will review whether policy wording could be strengthened to clarify that provision of appropriate amounts and quality of green infrastructure is a policy requirement.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI1 should be strengthened to require applicants to demonstrate how their proposal connects to surrounding habitats and green spaces, and how any on-site provision contributes to wider ecological connectivity rather than functioning as isolated landscape pockets.	The Council recognises the importance of creating a coherent, borough-wide ecological network rather than isolated landscape pockets, ensuring that green infrastructure delivers maximum biodiversity value and supports wildlife movement and habitat resilience. Proposed Policy GI1 already requires development to incorporate green infrastructure that enhances ecological connectivity, and proposed Policy GI4 (Protecting and Enhancing Biodiversity, Habitats and Ecological Networks) requires proposals to deliver measurable biodiversity net gain, which inherently encourages connected habitat creation. The Council will consider whether additional policy wording would provide beneficial clarity by explicitly requiring applicants to demonstrate through ecological assessments and green infrastructure strategies how on-site provision connects to and enhances surrounding habitats, wildlife corridors, and the wider ecological network.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI1 should state that green infrastructure assets must be subject to enforceable management arrangements, including maintenance responsibilities, funding mechanisms and monitoring where appropriate.	The Council recognises that effective long-term management, maintenance, and monitoring are essential to ensure green infrastructure delivers intended benefits including biodiversity enhancement, climate resilience, and community wellbeing. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) already provides the framework for securing long-term management through Section 106 planning obligations and planning conditions. The Council will consider whether additional policy wording explicitly requiring management plans setting out maintenance responsibilities, funding mechanisms, and monitoring arrangements would provide beneficial clarity. The Council is committed to working with developers to secure effective long-term stewardship of green infrastructure assets, ensuring they continue to deliver environmental, social, and climate benefits for communities across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI1 should reference Natural England's Green Infrastructure Framework with an ambition to integrate GI standards, in particular the Green Infrastructure Strategy Standard	Proposed Policy G1 will already require development to protect, enhance and extend green infrastructure networks, including contributing to improved accessibility, connectivity, quality, and multifunctionality of green infrastructure. The Council will consider this recommendation and where appropriate aim for alignment with the principles of Natural England's Green Infrastructure Framework and relevant standards.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that the Council take part in the Nature Towns and Cities Accreditation scheme	The Council is committed to nature recovery, climate action, and sustainable development, as can be seen through the emerging policies for the Local Plan, including strategic policies on biodiversity and ecological infrastructure, green infrastructure and climate change. The Council consider the scheme in the context of its existing corporate duties, priorities and strategies.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI2 should be amended to make clear that buffer zones alongside waterways must function as semi-natural habitat and must not be treated as private gardens, incidental open space, roads, parking, or left-over drainage margins.	Proposed Policy GI2 will already require appropriate protection and enhancement of watercourses and associated buffer zones, and the Council will consider whether additional policy wording would provide beneficial clarity regarding the design, function, and management of buffer zones.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI2 should explicitly recognise the role of riparian trees, wet woodland and other tree-led nature-based solutions to support the integration of tree planting with sustainable drainage and natural flood management.	The Council recognises that tree planting alongside watercourses provides multiple benefits including flood risk reduction, water quality improvement, biodiversity enhancement, and climate resilience. Proposed Policy GI2 already requires protection and enhancement of watercourses and associated green infrastructure, and the Council will consider whether additional policy wording would provide beneficial clarity by explicitly recognising riparian tree planting and wet woodland as integral components of sustainable drainage and natural flood management.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI2 should state that proposals must protect hydrology, soil conditions and natural drainage patterns, especially where nearby woodland, wet habitats or veteran trees may be affected.	Proposed Policy GI1, Green and Blue Infrastructure Network, GI3, Local Nature Recovery Strategy, GI4, Biodiversity, Habitats and Ecological Networks, GI6, Urban Greening, Trees and Landscaping, and GI7, Open Space require sustainable drainage systems that respect natural drainage patterns. The Council will consider whether additional policy wording would provide beneficial clarity by explicitly requiring assessment and protection of existing hydrology, soil conditions, and drainage patterns.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI2 should include requirements to deliver Local Nature Recovery Strategy (LNRS) measures	Policy GI2 will require that development proposals identify and respond positively to the unique attributes of waterways, including investigating and maximising opportunities to enhance or restore river channels, flood flow pathways, floodplains and other natural flood management features and incorporating measures to enhance the ecological, amenity, recreational and historic value of water spaces. The Council will review whether it would be beneficial to explicitly reference a requirement to deliver LNRS measures in the policy. Note that the Draft Local Plan also already includes proposed Policy GI4 (Protecting and Enhancing Biodiversity, Habitats and Ecological Networks). This is intended as a strategic policy that will set out the Council's approach towards promoting and securing conservation, restoration and management of habitats as well as the protection of species, working alongside the LNRS as part of a strategic approach to nature conservation and to deliver Biodiversity Net Gain within the Borough. Therefore, this policy may be more appropriate as the vehicle to seek to meet objectives set out in the LNRS, including by setting out the approach towards proposals that could have wider impacts on biodiversity.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI3 should do more to distinguish between natural greenspace and general amenity or formal recreational space, and should require prior identification of existing trees, hedgerows, woodland edges, notable trees and habitat networks so that these assets shape the design and management approach.	Policies GI1, Green and Blue Infrastructure Network, GI3, Local Nature Recovery Strategy, GI4, Biodiversity, Habitats and Ecological Networks, GI6, Urban Greening, Trees and Landscaping, and GI7, Open Space require protection of existing environmental assets, and the Council will consider whether additional policy wording in Policy GI3 would provide beneficial clarity by distinguishing natural greenspace from formal recreational provision in open space requirements.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI3 should be informed by a larger GBI study	At Regulation 19 stage Policy GI3 and GI4 will be informed by an up-to-date Green and Blue Infrastructure Study for the borough, as well as an Open Space Assessment, both of which are currently under preparation.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation to include an Accessible Greenspace Standard within the plan	The Local Plan will be supported by an up-to-date Open Space Assessment, Outdoor Sports and Playing Pitch Study and Green and Blue Infrastructure Strategy for the borough, all of which will inform updated local open space standards for new developments to ensure that open space provision is accessible, high-quality, multifunctional, well-maintained, and meets the needs of all ages and abilities. The local standards will also be informed by recognised national open space standards. The Council will consider, in line with this evidence, whether to include a specific Accessible Greenspace Standard as part of policy and guidance.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Green Infrastructure should be planned strategically and consider local capacity and typology	The Local Plan will be supported by a borough level Green and Blue Infrastructure Strategy and an Open Space Assessment, as well as other environmental evidence and an Infrastructure Delivery Plan, which collectively will assess existing green infrastructure provision by type, quantity, quality, accessibility, distribution, and functionality, identify strategic green infrastructure networks, ecological corridors, and priority enhancement areas, assess deficiencies in provision against local standards and community needs, and identify opportunities for green infrastructure enhancement, creation, and improved connectivity and multifunctionality at a strategic level.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that consideration needs to be given to ensuring quality of design and future management of sites. Measures to enhance / improve greenspace quality could be included in the Infrastructure Delivery Plan	The Local Plan will include strategic policies on design quality requiring development to achieve high-quality design that responds to local character, creates attractive and distinctive places, and incorporates high-quality public realm, landscaping, and green infrastructure, as well as policies requiring protection, enhancement, and provision of multifunctional, accessible, high-quality open space. Future management will be secured through developer contributions as set out in policy and in the Infrastructure Delivery Plan.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that the Plan should ensure that new development contributes to the delivery of the government's target that every household is located within 15 minutes of good quality green infrastructure, as outlined in the Environmental Improvement Plan 2023	The Local Plan will be supported by an up-to-date Open Space Assessment, Outdoor Sports and Playing Pitch Study and Green and Blue Infrastructure Strategy for the borough, all of which will inform updated local open space standards for new developments to ensure that open space provision is accessible, high-quality, multifunctional, well-maintained, and meets the needs of all ages and abilities. The local standards will also be informed by recognised national open space standards.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI4 should clearly distinguish between irreplaceable habitats, general biodiversity enhancement and biodiversity net gain, and include a specific criterion stating that development resulting in the loss or deterioration of ancient woodland, ancient trees or veteran trees will be refused unless wholly exceptional reasons exist and a suitable compensation strategy is secured, while making clear that compensation is not a substitute for avoiding harm.	Proposed Policy GI4 (Protecting and Enhancing Biodiversity, Habitats and Ecological Networks) provides protection for irreplaceable habitats and biodiversity assets, and establishes the framework for biodiversity net gain in accordance with the Environment Act 2021. The Council will consider whether additional policy wording would provide beneficial clarity by including a specific criterion that development resulting in loss or deterioration of ancient woodland, ancient trees, or veteran trees will be refused unless wholly exceptional reasons exist and a suitable compensation strategy is secured. The Council is committed to protecting irreplaceable habitats and ensuring that development delivers measurable biodiversity enhancement across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI4 should be amended to establish 20% BNG as the policy expectation, or at minimum state that the Council will seek to exceed the statutory minimum where justified, and state that proposals involving woodland creation, strategic habitat corridors or other long-term habitats will be expected to secure longer management periods. The policy should also require BNG to be designed in line with the Local Nature Recovery Strategy.	Policies GI1, Green and Blue Infrastructure Network, GI3, Local Nature Recovery Strategy, GI4, Biodiversity, Habitats and Ecological Networks, GI6, Urban Greening, Trees and Landscaping, and GI7, Open Space require development to deliver measurable BNG in line with statutory requirements, with a minimum of 20% net gain as established by the Environment Act 2021. The Council will consider whether setting a higher policy expectation, or stating that the Council will seek to exceed the statutory minimum where justified by site circumstances and viability, would provide beneficial ambition whilst recognising that viability considerations may affect achievability on some sites. The Council acknowledges that proposals involving woodland creation, strategic habitat corridors, or other long-term habitats require management periods beyond the statutory 30-year minimum to deliver meaningful ecological benefits and will consider strengthening policy wording to require extended management periods where appropriate. The Council agrees that BNG should be designed in alignment with the Local Nature Recovery Strategy to ensure strategic, landscape-scale biodiversity enhancement that contributes to coherent ecological networks across Hertsmere and the wider area.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI5 should state explicitly that development proposals must retain existing trees wherever possible and must demonstrate why any losses are unavoidable; require a more complete arboricultural evidence base; should recognise ancient and veteran trees as irreplaceable habitats; should protect notable trees as part of the future veteran resource; require applicants to identify such trees early; and encourage surveys to check and update the Ancient Tree Inventory.	Policies GI1, Green and Blue Infrastructure Network, GI3, Local Nature Recovery Strategy, GI4, Biodiversity, Habitats and Ecological Networks, GI6, Urban Greening, Trees and Landscaping, and GI7, Open Space requires development to protect existing trees and provide arboricultural assessments, and the Council will consider whether additional policy wording would provide beneficial clarity by explicitly requiring applicants to retain existing trees wherever possible and demonstrate why any losses are unavoidable. The Council supports requiring comprehensive arboricultural evidence including surveys identifying ancient, veteran, and notable trees at the earliest design stages to ensure these assets shape development layouts and encourages applicants to undertake surveys that can contribute to updating the Ancient Tree Inventory. The Council is committed to ensuring robust tree protection and retention.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation that Policy GI5 should require a net increase in canopy cover, prioritise planting in areas of low canopy and poor access to nature, include a commitment to monitor canopy change over the plan period, consider adding a requirement for major schemes to meet a minimum Urban Greening Factor, make clear that replacement planting must reflect the size and value of the trees lost and must not be used to justify avoidable removal of mature, ancient or veteran trees.	Proposed Policy GI6 would require tree retention and replacement planting, and the Council will consider whether additional policy wording would provide beneficial clarity by requiring development to achieve a net increase in canopy cover, prioritising tree planting in areas identified as having low canopy cover or poor access to nature and committing to monitor canopy change over the plan period to track progress. The Council will also consider introducing a requirement for major schemes to meet a minimum Urban Greening Factor and strengthening policy wording to make clear that replacement planting must reflect the size, age, and ecological value of trees lost. The Council is committed to expanding and protecting tree canopy cover to support healthy, climate-resilient communities across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Opposition to the use of the Urban Green Factor in Policy GI5 as it does not take into account site specific factors.	Proposed Policy GI6 requires development to incorporate appropriate green infrastructure including tree planting and landscaping, with the aim of delivering biodiversity enhancement, climate resilience, and accessible green space. The Council notes that the Urban Greening Factor can provide a transparent, measurable framework for assessing the quantum and quality of green infrastructure provision but acknowledges that flexibility may be required to respond to site-specific circumstances, constraints, and design opportunities. The policy framework allows for site-specific considerations to be taken into account in the assessment of planning applications, ensuring that green infrastructure requirements are appropriately tailored whilst maintaining robust standards for environmental quality. The Council will keep this matter under review to ensure that policy requirements deliver high-quality green infrastructure outcomes whilst remaining deliverable and responsive to site-specific context across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Support for inclusion of Urban Greening Factor in Policy GI5	The Council welcomes support for the use of an Urban Greening Factor. Policy GI6 (Urban Greening, Trees and Landscaping) requires qualifying major development to seek to achieve the applicable Urban Greening Factor.
Infrastructure (other than transport)	Green/blue infrastructure	Objection to Policy GI4 setting out a 10% biodiversity net gain to be delivered on all sites as it is a legislative requirement.	The Council recognises that the Environment Act 2021 establishes a mandatory minimum 20% BNG requirement for most development, and that this is a statutory requirement that applies regardless of local plan policy. However, the Council considers it appropriate to include the BNG requirement within Policy GI4 to provide clarity and transparency for applicants, decision-makers, and communities about the environmental standards expected in Hertsmere, to confirm the Council's commitment to delivering biodiversity enhancement, and to provide a policy framework that can set local expectations including the potential to exceed the statutory minimum where appropriate and deliverable. The inclusion of BNG within local plan policy ensures that biodiversity enhancement is embedded within the broader policy framework for environmental protection and green infrastructure delivery and provides a basis for the Council to encourage higher standards where site circumstances and viability allow, supporting the Draft Local Plan's objectives for environmental protection and enhancement across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Green/blue infrastructure	Objection to Policy GI6 because no substantive evidence has been received to support the need for allotments.	The Council's evidence base includes an assessment of open space provision across the borough, which identifies existing and future requirements for different types of open space including allotments, taking account of population growth and community needs. Proposed Policy GI8 (Communal Gardens and Food Growing) would seek to protect existing allotment provision and require new provision where justified by evidence of need, recognising the health, wellbeing, food-growing, community cohesion, and biodiversity benefits that allotments provide.
Infrastructure (other than transport)	Green/blue infrastructure	Concern about the pressure that development at higher densities will put on the existing open space, recreational areas and parks.	The Council recognises the importance of ensuring that development provides adequate open space and recreational facilities to meet the needs of new and existing communities. The Draft Local Plan includes proposed Policy GI1 (Hertsmere's Green and Blue Infrastructure) and proposed Policy GI7 (Open), which would protect existing provision and require new development to deliver open space in accordance with evidence-based standards set out in the Open Space Assessment. Where on-site provision is not feasible or sufficient, Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) enables the Council to secure financial contributions through Section 106 planning obligations to enhance existing open spaces, parks, and recreational facilities to accommodate increased use. Higher density development is supported by Policy HQD1 (Delivering High-Quality Design in Hertsmere), which requires high-quality design that incorporates accessible green space, and the Council is committed to ensuring that development delivers sufficient open space provision, whether on-site or through enhancement of existing facilities, to support the health, wellbeing, and recreational needs of growing communities across Hertsmere.
Infrastructure (other than transport)	Green/blue infrastructure	Recommendation for using the natural history of the area to celebrate local character, through highlighting the natural environment and providing high-quality greenspace	The Council recognises that Hertsmere's distinctive landscape character, biodiversity, and natural heritage contribute significantly to local identity and sense of place, and that development should respond positively to and enhance these characteristics. Proposed Policy HQD1 (Delivering High-Quality Design in Hertsmere) would require development to respond to local distinctiveness and landscape character, and proposed Policy GI1 (Hertsmere's Green and Blue Infrastructure) would require high-quality green infrastructure that enhances biodiversity and provides accessible green space for communities. The Council supports development that celebrates and enhances Hertsmere's natural heritage through interpretive features, native planting that reflects local ecology and landscape character, retention and enhancement of historic landscape features, and provision of high-quality greenspaces that connect people with nature and local natural history. The Council is committed to ensuring that development strengthens local character by integrating the borough's distinctive natural environment into design, creating places that are rooted in their landscape context and provide opportunities for residents and visitors to experience and enjoy Hertsmere's natural heritage.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Social Infrastructure	Recommendation that the plan would be strengthened by the inclusion of a clearer explanation of how education contributions will be calculated based on the pupil yields generated by developments, available capacity, resulting shortfall in places, and cost per place applied to derive expected contributions.	The Council recognises the importance of transparency in setting out infrastructure requirements and how planning obligations will be calculated to ensure that development delivers necessary infrastructure including education facilities. Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing infrastructure delivery through Section 106 planning obligations and other mechanisms, including education provision. The Council works in partnership with Hertfordshire County Council as the local education authority to assess education capacity and requirements arising from development, and contributions are calculated using established methodologies based on pupil yield multipliers for different dwelling types and sizes, assessed capacity at existing schools, projected shortfall in places, and the County Council's cost per place for new school provision or expansion. The Council will consider whether additional detail explaining the methodology for calculating education contributions would provide beneficial clarity and transparency within the Draft Local Plan or supporting documents, ensuring that applicants, decision-makers, and communities understand how contributions are derived and applied to deliver necessary education infrastructure across Hertsmere.
Infrastructure (other than transport)	Social Infrastructure	Recommendation that the Plan / its evidence should confirm that the cost per pupil place is based on the DfE school place scorecards. This will help to ensure that the education contributions required are considered fair, consistent and defensible.	Education contributions in Hertsmere are calculated in partnership with Hertfordshire County Council as the local education authority, which uses cost multipliers informed by the DfE school place scorecards and other relevant guidance to ensure that costs per pupil place reflect current building costs and educational standards. Policy SC11 provides the framework for securing education and other social infrastructure generated by development, having regard to the latest Infrastructure Delivery Plan and the plans, strategies and requirements of infrastructure providers, including Hertfordshire County Council.
Infrastructure (other than transport)	Social Infrastructure	Support for the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development, consistent with Regulation 122 of the CIL Regulations.	The Council welcomes this support for the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development. The Council works in partnership with Hertfordshire County Council as the local education authority to assess education needs arising from development and to ensure that contributions are compliant with Regulation 122 and proportionate to the impacts of each development. The Council is committed to using planning obligations to secure necessary education infrastructure that supports sustainable communities and ensures that development delivers the facilities and services required by new and existing residents across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Social infrastructure	Provision needs to be made for burial space (providing for the different needs of different parts of the local community)	The Council recognises that adequate burial and cremation facilities are an important community infrastructure requirement that must be planned for to meet current and future needs, including the diverse cultural and religious requirements of Hertsmere's communities. The Draft Local Plan's proposed infrastructure policies, including Policy DM2 (Infrastructure Funding and Planning Obligations), provide a framework for planning and delivering necessary community infrastructure, and the Council will work with relevant stakeholders to assess current and projected burial capacity across the borough and identify requirements for new or extended burial provision over the plan period.
Infrastructure (other than transport)	Social infrastructure	Local Plan should provide greater certainty about the location and delivery of new schools.	The Council recognises the importance of ensuring that adequate education infrastructure is planned and delivered to support new development and meet the needs of growing communities. The Council works in partnership with Hertfordshire County Council as the local education authority to assess education capacity and requirements arising from planned growth, and proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing necessary infrastructure delivery including education provision. The Draft Local Plan allocates strategic sites where new or expanded school provision may be required, and site-specific policies identify infrastructure requirements including education facilities where these have been identified through capacity assessments. The Council will consider whether additional detail regarding the location, timing, and delivery mechanisms for new schools should be included within the Draft Local Plan or supporting Infrastructure Delivery Plan to provide greater certainty and transparency for applicants, decision-makers, and communities about how education needs arising from planned growth will be met across Hertsmere.
Infrastructure (other than transport)	Social infrastructure	Importance of ensuring new and improved social infrastructure is delivered by (and alongside) new development.	The Council recognises that sustainable development requires timely delivery of necessary infrastructure to support new and existing communities. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing infrastructure delivery through Section 106 planning obligations, conditions, and other mechanisms, ensuring that development contributes appropriately to the infrastructure required to make it acceptable in planning terms. The Draft Local Plan's site allocations include specific infrastructure requirements identified through ongoing engagement with infrastructure providers, and the Infrastructure Delivery Plan identifies the type, scale, cost, and timing of infrastructure needed to support planned growth. The Council works closely with infrastructure providers including Hertfordshire County Council, health commissioners, utility companies, and National Highways to coordinate delivery and ensure that infrastructure is provided at the right time to support sustainable communities. The Council is committed to ensuring that social infrastructure is planned, funded, and delivered effectively alongside development to create healthy, inclusive, and well-connected communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Social infrastructure	General opposition to / concern about development due to perceived difficulty in supporting growth with social infrastructure in practice	The Council recognises that infrastructure delivery is fundamental to sustainable development and that communities need confidence that new development will be supported by necessary facilities and services including schools, healthcare, transport, open spaces, and community facilities. The Draft Local Plan has been prepared alongside an Infrastructure Delivery Plan that assesses the infrastructure requirements arising from proposed development, identifies capacity constraints, and sets out how and when necessary, infrastructure will be delivered in partnership with infrastructure providers including Hertfordshire County Council, health commissioners, utility companies, and transport authorities. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) provides the framework for securing developer contributions through Section 106 planning obligations to fund and deliver required infrastructure, ensuring that development mitigates its impacts and provides necessary facilities. The Council is committed to working proactively with infrastructure providers and developers to coordinate delivery, phasing development appropriately where necessary to align with infrastructure provision, and monitoring implementation to ensure that infrastructure is delivered alongside growth to support sustainable, well-served communities across Hertsmere.
Infrastructure (other than transport)	Social infrastructure	Concern that the plan would lead to a loss of existing social infrastructure	The Council recognises the importance of protecting existing community facilities including schools, healthcare facilities, community centres, sports and recreation facilities, and other social infrastructure that serve local communities. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) and related policies, including proposed Policy GI7 (Open Space), provide protection for existing social infrastructure and community facilities, and require evidence that facilities are genuinely surplus to requirements, are no longer viable, or can be appropriately replaced before permission is granted for alternative uses. The Draft Local Plan seeks to plan positively for new social infrastructure to support growth whilst safeguarding existing provision that continues to serve community needs, ensuring that development enhances rather than diminishes the range and quality of facilities available to residents. The Council is committed to protecting valued social infrastructure and will resist proposals that would result in the loss of facilities unless robust evidence demonstrates that they are no longer needed or that equivalent or improved provision will be made available, ensuring that communities across Hertsmere retain access to essential services and facilities.
Infrastructure (other than transport)	Social infrastructure	The next iteration of the Local Plan should identify strategic allocations that can deliver the social infrastructure needs of the community, based on the identified need and demand in the Infrastructure Delivery Plan (April 2026). Such site allocations and associated safeguarding policies should also seek to clarify requirements for delivery of new social infrastructure, including delivery timescales, minimum site area required, and any preferred site characteristics.	The Draft Local Plan includes strategic site allocations where specific infrastructure requirements have been identified through engagement with infrastructure providers, and proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing delivery. The Council is committed to proactive planning for social infrastructure to ensure that land is safeguarded and facilities are delivered at the right time and in the right locations to meet the needs of growing communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Social infrastructure	Recommendation that the requirement for developer contributions towards social infrastructure are confirmed at planning application stage for large sites.	The Council recognises the importance of establishing clear infrastructure requirements and financial contributions early in the planning process to provide certainty for applicants, infrastructure providers, and communities, and to ensure that necessary facilities are planned and delivered effectively. For large strategic sites, the Council engages with applicants and infrastructure providers at pre-application stage to identify likely infrastructure requirements and contributions, providing early clarity and enabling effective masterplanning and phasing. The Council is committed to ensuring that infrastructure requirements and developer contributions are clearly established and confirmed at planning application stage, particularly for major and strategic sites, enabling timely delivery of necessary social infrastructure including schools, healthcare facilities, community centres, and transport improvements to support sustainable development across Hertsmere.
Infrastructure (other than transport)	Social infrastructure	Recommendation for health infrastructure to be recognised within the definition of essential infrastructure in the Local Plan, with expectation that development proposals will make provision to meet cost of healthcare infrastructure made necessary by development.	The Council recognises that healthcare facilities are fundamental to sustainable communities and that new development generates additional demand for primary care, community health services, and hospital capacity that must be planned for and funded appropriately. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing infrastructure delivery including healthcare provision, and the Council works in partnership with Integrated Care Boards and NHS England to assess healthcare capacity and requirements arising from planned growth. The Council will consider whether explicitly recognising health infrastructure within the definition of essential infrastructure in the Draft Local Plan would provide beneficial clarity and reinforce the expectation that development proposals will contribute appropriately towards healthcare facilities. The Council is committed to ensuring that healthcare infrastructure is planned, funded, and delivered effectively to support healthy communities and meet the needs of new and existing residents across Hertsmere.
Infrastructure (other than transport)	Social infrastructure	Recommendation for Local Plan to consider significant cumulative impact of smaller housing developments and associated need for mitigation through social infrastructure provision.	The Council recognises that while individual small-scale developments may have limited impacts, the cumulative effect of multiple smaller sites can place significant pressure on existing infrastructure including schools, healthcare facilities, transport networks, open spaces, and community services. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) provides the framework for securing developer contributions from developments of all scales where they generate demonstrable impacts on infrastructure capacity, and the Council works with infrastructure providers to assess cumulative needs arising from planned growth including smaller windfall sites. The Council will consider whether the Draft Local Plan or supporting evidence should provide greater clarity on how cumulative impacts of smaller developments will be assessed and mitigated.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Social Infrastructure	Plan will result in loss of equestrian uses.	The Council recognises that equestrian facilities and land contribute to the rural economy, provide recreational opportunities, support rural character, and form part of the borough's diverse land use. The Draft Local Plan seeks to balance the need to deliver housing and employment growth to meet identified needs whilst protecting valued community facilities, open spaces, and rural character through policies protecting open space and recreational facilities. Where site allocations involve land currently in equestrian use, the Council has assessed the contribution of those sites to meeting development needs and considers that the benefits of allocating sites for housing or other development outweigh the loss of equestrian use, particularly where alternative equestrian facilities exist or can be provided. The Council will consider representations regarding specific sites where equestrian uses may be affected and will assess whether any additional policy protection or mitigation is appropriate to support continued equestrian activity where it contributes to the rural economy and community needs across Hertsmere.
Infrastructure (other than transport)	Social Infrastructure	Recommendation that a site allocation policy should require on-site provision of sports facilities to meet increased demand generated by development, as supported by Open Space, Sport and Recreation Strategy to provide a strategic framework for sport and recreation provision.	The Council will consider the requirements for on-site sports provision to be a policy requirement for allocations where the Outdoor Sports and Playing Pitch Study (2026) has identified a need for on-site provision and continue to engage with Sports England in relation to open space and sports provision on site allocations. Policy SCI3 (Delivering Sports, Recreation and Play Spaces) will also seek to enhance and retain existing provision as well as requiring proposals containing new sports provision to be supported by an appropriate maintenance and management strategy to ensure the ongoing management of open space and sports provision in the long term.
Infrastructure (other than transport)	Social Infrastructure	Support for requiring provision of sufficient, quality community facilities.	The Council recognises that community facilities are essential to creating sustainable, healthy, and inclusive communities. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing necessary community facilities through planning obligations, conditions, and direct provision on allocated sites, ensuring that development contributes appropriately to the infrastructure required to support growing communities. The Draft Local Plan's site allocations identify specific requirements for community facilities where these have been identified through engagement with service providers and assessment of capacity, and proposed policies including Policy GI1 (Hertsmere's Green and Blue Infrastructure) and Policy GI7 (Open Space) protect and enhance existing provision. The Council is committed to ensuring that new development delivers sufficient, high-quality community facilities that are well-designed, accessible, and meet the diverse needs of residents, supporting the creation of vibrant, cohesive, and well-served communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Social Infrastructure	Concern that proposed policy SCI1 is not effective in its current form. Further flexibility is required to ensure redundant sites can still be used to provide alternative social or community uses, or to help fund improve healthcare services if chosen for disposal as surplus to requirement. Proposed Modification to Draft Policy SCI1: "Where healthcare facilities are formally declared surplus to the operational healthcare requirements of the NHS or identified as surplus as part of a published estates strategy or service transformation plan, there will be no requirement to retain any part of the site in an alternative community use."	<i>The Council recognises the importance of ensuring that redundant sites can still be used to provide alternative social and community uses or to help fund improving healthcare services. Policy SCI1 (Safeguarding and Securing Social and Community Infrastructure) is worded so that the disposal of land surplus to requirement will not be resisted if it can be demonstrated that the disposal is part of a public sector disposal or it is clearly evidenced that there is no current or future need for the provision. The wording of Policy SCI1 will be clarified to ensure flexibility and consideration will be given the recommended wording of the policy as contained within the representation.</i>
Infrastructure (other than transport)	Social Infrastructure	Suggestion for addition to paragraph 8.1.5 to recognise that an exception to the general presumption against the loss of community infrastructure may be made where a proposal can be justified as part of public sector disposal of the use to help improve service provision but needs to be qualified. It should be stated that this does not apply to community infrastructure that includes sport and recreation facilities.	The Council recognises the need to enable public service providers including the NHS, local authorities, and other public bodies to rationalise estates and reinvest disposal proceeds into improved facilities and services, whilst maintaining appropriate protection for valued community infrastructure. The Council acknowledges that sport and recreation facilities, including playing fields and outdoor sports facilities, are afforded specific protection under paragraph 104 of the NPPF and Sport England guidance, requiring evidence that facilities are surplus to requirements, would be replaced by equivalent or better provision, or that the benefits of alternative development clearly outweigh the loss. The Council will consider whether additional explanatory text in paragraph 8.1.5 would provide beneficial clarity by recognising that public sector disposal to improve service provision may justify loss of some community infrastructure whilst making clear that sport and recreation facilities remain subject to specific protective policies
Infrastructure (other than transport)	Social Infrastructure	Recommendation that scope of policy SCI3 should be broader than play space as implied by paragraph 8.3.3, as it will need to cover sport and recreation as well. While a policy focus, as set out in paragraphs 8.3.3 and 8.3.8, upon securing on-site provision for play space and some forms of recreation provision may be appropriate, this will not be appropriate for sports facilities.	Proposed Policy SCI3 and supporting paragraphs seek to ensure that development delivers appropriate provision based on evidence-based standards set out in the Open Space Assessment and Playing Pitch Strategy, recognising that larger strategic sports facilities serving wider catchments may be more appropriately delivered through off-site contributions to enhance existing facilities or create new strategic provision rather than on-site delivery. The Council will review the policy wording and supporting text to ensure that Policy SCI3 clearly distinguishes between requirements for on-site play space and informal recreation provision, which are appropriate for most residential developments, and requirements for sports facilities, which may be met through on-site provision, off-site contributions, or a combination depending on site scale, identified needs, and strategic facility requirements, ensuring flexible and effective delivery of sport and recreation infrastructure across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Social Infrastructure	Recommendation of added reference to new development being designed to encourage active movement, having regard to the Healthy Street approach and the Active Design guidance in policy SCI3. Key design policies especially should consider how developments should be designed to encourage activity in broader terms, as the scope of this approach should not just be focused on informal play.	The Council recognises that creating healthy, active communities requires development to be designed to encourage physical activity, active travel, social interaction, and access to nature through well-connected streets, attractive walking and cycling routes, accessible green spaces, and layouts that prioritise pedestrians and cyclists. Proposed Policy HQD1 (Delivering High-Quality Design in Hertsmere) requires development to achieve high-quality design that responds to context and creates attractive, safe, and accessible environments, and proposed Policy TR1 (Sustainable Transport and Movement) requires development to prioritise walking, cycling, and public transport. The Council will consider whether explicit reference to the Healthy Streets approach and Active Design guidance within Policy SCI3 and other key design policies would provide beneficial clarity and reinforce the expectation that development should incorporate design principles that encourage physical activity across all age groups
Infrastructure (other than transport)	Social Infrastructure	Objection to a site allocation as it is currently in uses as a sports ground and is not recommended for release and disposal in the Hertsmere Playing Pitch Strategy (2019) Action Plan. The strategy is currently under review, and any recommendations should be taken into consideration when allocating the site. Allocation of site will only be supported if there was a policy requirement for a replacement playing field site to be provided with equivalent or better facilities in terms of quantity and quality in a suitable location prior to any development on the site. The Council should consider making a related site allocation in the emerging Local Plan for a replacement playing field site to provide certainty that the replacement site could be delivered in planning terms.	The Council recognises the need to comply with national policy on the protection of sports facilities and playing fields. The Council notes that the Playing Pitch Strategy is currently under review to provide an updated evidence base on playing pitch supply, demand, quality, accessibility, and future requirements arising from population growth and development. The Council take into account the findings and recommendations of the updated Playing Pitch Strategy to inform the Regulation 19 Publication version of the Local Plan and will update policy requirements as required.
Infrastructure (other than transport)	Social Infrastructure	General concern about how improved infrastructure will be delivered alongside growth.	The Council recognises that infrastructure delivery is fundamental to sustainable development and that communities need confidence that necessary facilities and services including transport, education, healthcare, utilities, open spaces, and community facilities will be provided to support new development. The Draft Local Plan has been prepared alongside an Infrastructure Delivery Plan (April 2026) that identifies the type, scale, cost, timing, and funding sources for infrastructure required to support planned growth, based on engagement with infrastructure providers including Hertfordshire County Council, Integrated Care Boards, utility companies, Highways England, and transport authorities. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for securing developer contributions through Section 106 planning obligations to fund necessary infrastructure, and site-specific policies identify key infrastructure requirements for strategic allocations. The Council is committed to working proactively with infrastructure providers and developers to coordinate delivery, phasing development appropriately where necessary to align with infrastructure provision, and monitoring implementation to ensure that infrastructure is delivered at the right time to support sustainable communities. The Council will continue to update the Infrastructure Delivery Plan throughout the plan period to respond to changing circumstances and ensure effective infrastructure delivery across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Social Infrastructure	Recommendation that an additional policy or addition to the proposed draft policy SCI2 is included in the Regulation 19 draft Local Plan along the following lines: "The Council will support the providers and promoters of new and improved educational facilities within the Borough, by affording great weight in planning decisions to the need to create, expand or alter these facilities."	The Council recognises the critical importance of ensuring adequate education provision to meet the needs of existing and growing communities, and that educational facilities are essential social infrastructure. Proposed Policy SCI2 establishes the framework for delivering education infrastructure and protecting existing educational facilities, and the Council works in partnership with Hertfordshire County Council as the local education authority to assess capacity and requirements arising from planned growth. The Council will consider whether additional policy wording explicitly affirming that great weight will be afforded to the need to create, expand, or alter educational facilities would provide beneficial clarity and reinforce the Council's commitment to supporting education provision.
Infrastructure (other than transport)	Social Infrastructure	Recommendation that subsection is added to Policy SCI2 to greater align with paragraph 100 of the NPPF. For example: "The Council will adopt a proactive, positive and collaborative approach to working with school promoters through pre-application discussions and planning applications to support the delivery of new and expanded educational facilities."	The Council recognises the importance of working constructively with school promoters, including local education authorities, academy trusts, and free school providers, to facilitate the timely delivery of new and expanded educational facilities through pre-application engagement and planning application processes, ensuring that education infrastructure is delivered to meet the needs of growing communities. The Council will consider whether additional policy wording explicitly confirming that the Council will adopt a collaborative approach would provide beneficial clarity.
Infrastructure (other than transport)	Social Infrastructure	Support for Policy SCI3 as sports facilities facilitate participation and physical activity for health improvement, mental health and development of individuals and team skills.	The Council welcomes this support for proposed Policy SCI3. The Council is committed to ensuring that development delivers accessible, high-quality sport and recreation facilities that support active lifestyles and meet the diverse needs of all residents across Hertsmere.
Infrastructure (other than transport)	Social Infrastructure	No mention of how the police and fire services will be able to cover the housing increase, especially after funding cuts to local services.	The Council recognises that emergency services including police and fire are essential infrastructure that must have adequate capacity and resources to serve existing and growing communities safely and effectively. The Draft Local Plan has been prepared in consultation with emergency service providers including Hertfordshire Constabulary and Hertfordshire Fire and Rescue Service to assess the implications of planned growth on service delivery and infrastructure requirements, and this engagement informs the Infrastructure Delivery Plan (April 2026), which identifies necessary infrastructure to support development. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) provides the framework for securing developer contributions through Section 106 planning obligations towards infrastructure made necessary by development, which may include contributions towards police and fire service facilities, equipment, or other infrastructure where evidence demonstrates that development creates additional demand that requires mitigation. The Council is committed to continuing engagement with emergency service providers throughout the plan period to ensure that capacity and infrastructure requirements are identified and addressed, and that development contributes appropriately towards the facilities and resources needed to maintain effective emergency service provision across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Social Infrastructure	Requirement for the Borough Council and County Council to collaborate to address matters relating to education, including identifying an appropriate and sustainable secondary school site to serve the west of the borough and ensuring that the identified school site in Borehamwood is deliverable	The Council recognises that effective partnership working between the Borough Council as local planning authority and the County Council as local education authority is essential to ensure that adequate education infrastructure is planned and delivered to meet the needs arising from planned growth, in accordance with the duty to cooperate. The Council works closely with Hertfordshire County Council through ongoing engagement to assess education capacity, identify requirements for new or expanded school provision, and ensure that sites allocated for education use are appropriate, deliverable, and available when needed. The Draft Local Plan and Infrastructure Delivery Plan (April 2026) have been informed by this collaborative work, and the Council is committed to continuing this partnership throughout the plan period to address education needs including secondary school provision in the west of the borough and delivery of the identified school site in Borehamwood.
Infrastructure (other than transport)	Utilities infrastructure	General concern about existing drainage infrastructure being able to cope with increased run-off.	The Council recognises that sustainable drainage and flood risk management are critical to ensuring that development does not increase flood risk elsewhere and that drainage infrastructure has adequate capacity to manage surface water from new development. Proposed Policy SD8 (Water Supply and Wastewater) requires all major development to incorporate SuDS to manage surface water run-off, reduce flood risk, improve water quality, and deliver biodiversity and amenity benefits, with drainage strategies demonstrating that surface water discharge rates will not exceed existing greenfield run-off rates and that adequate attenuation is provided. The Draft Local Plan has been informed by the Strategic Flood Risk Assessment and ongoing engagement with the Lead Local Flood Authority (Hertfordshire County Council), Thames Water, and the Environment Agency to assess drainage capacity and flood risk, and the Infrastructure Delivery Plan identifies necessary drainage infrastructure improvements. The Council is committed to ensuring that development incorporates effective SuDS, does not increase flood risk, and where necessary contributes towards strategic drainage infrastructure improvements to ensure that existing and new communities are protected from flooding and that drainage systems have adequate capacity across Hertsmere.
Infrastructure (other than transport)	Utilities infrastructure	Support for increased provision of high-speed broadband to support jobs and businesses and improve home-working conditions.	The Council recognises that high-quality digital infrastructure including high-speed broadband and full fibre connectivity is essential to support economic growth, enable flexible and home working, facilitate access to services, and ensure that businesses and residents can participate fully in the digital economy. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for ensuring that necessary infrastructure including digital connectivity is planned and delivered alongside development. The Council is committed to supporting the expansion of high-quality digital infrastructure across Hertsmere and is working proactively with telecommunications providers to facilitate network deployment.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Utilities infrastructure	Concern over existing infrastructure capacity to accommodate new housing e.g. electricity, water, gas and wastewater	The Council recognises that adequate utilities infrastructure is essential to support new development and that existing networks must have sufficient capacity or be upgraded to serve growing communities safely and reliably. The Draft Local Plan has been prepared in consultation with utilities providers including Thames Water, Affinity Water, National Grid, UK Power Networks, and Cadent Gas to assess existing capacity constraints and infrastructure requirements arising from planned growth, and this engagement informs the Infrastructure Delivery Plan (April 2026), which identifies necessary infrastructure improvements including water supply reinforcement, wastewater treatment capacity upgrades, and electricity network enhancements. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for ensuring that development is supported by adequate utilities infrastructure, requiring developers to engage with providers at early stages to identify capacity issues and secure necessary upgrades, with contributions secured through planning obligations or conditions where appropriate. The Council is committed to continuing engagement with utilities providers throughout the plan period to ensure that infrastructure capacity constraints are identified and addressed, and that necessary improvements are delivered in a timely manner to support sustainable development across Hertsmere.
Infrastructure (other than transport)	Utilities infrastructure	Recommendation that Council should safeguard all existing NGET transmission assets; support future reinforcement and expansion; ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion; safeguard existing and potential access routes required for delivery and removal of Abnormal Indivisible Loads (AILs); resist development or highway alterations that would prejudice, constrain or render impracticable AIL access; and encourage early engagement with NGET to identify and resolve potential impacts at earliest possible stage of planning process.	The Council recognises that electricity transmission infrastructure is critical national infrastructure that must be protected from inappropriate development and that planned growth requires adequate energy infrastructure capacity. Proposed Policy DM2 (Infrastructure Funding and Planning Obligations) establishes the framework for ensuring adequate infrastructure provision, and the Council consults NGET on planning applications that may affect transmission assets or access routes. The Council will consider whether additional policy wording or supporting text should be included in the Draft Local Plan at the next stage.
Infrastructure (other than transport)	Utilities infrastructure	Freehold land, often held as "operational" for future operational use, is critical to allow for future expansion of NGET infrastructure already within the existing site, and this is particularly important given the context of NGET's role and responsibilities relating to the Great Grid Upgrade and UK's transition toward net zero	The Council recognises that energy infrastructure is critical national infrastructure that plays a fundamental role in delivering the UK's climate change commitments and that adequate land must be safeguarded to enable network expansion and reinforcement to meet future demand. The Council will work with NGET to ensure that operational land held by NGET is safeguarded as appropriate.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Utilities infrastructure	Recommendation that the relevant water company is consulted to ensure adequate water supply and wastewater infrastructure provision, in line with the requirements set out in Policy SD8.	The Council recognises that adequate water supply and wastewater treatment capacity are essential to support new development and that early engagement with water and wastewater undertakers is necessary to identify infrastructure constraints and secure timely delivery of necessary improvements. The Council has undertaken a Water Cycle Study to ensure that sufficient water supply is identified for new development and this will be published with the Regulation 19 draft Local Plan. The Council is committed to continuing consultation with water companies throughout the development management process, requiring applicants to engage with providers at pre-application and application stages to identify capacity issues and secure necessary infrastructure delivery.
Infrastructure (other than transport)	Social Infrastructure	Recommendation that there should be no net loss of local services, including retail	The Council recognises that protecting and enhancing access to local services and facilities including shops, community facilities, healthcare, education, leisure, and cultural facilities is essential to support sustainable communities, reduce the need to travel, promote social inclusion and wellbeing, and maintain the vitality and viability of town centres and local neighbourhoods. The Draft Local Plan includes policies to support the vitality and viability of town centres and local centres (Policies EC14 and EC15), protect and enhance community facilities (Policy DM2), resist the loss of valued facilities and services unless specific criteria are met demonstrating that retention is not viable or alternative provision is made, and require major developments to provide or contribute to necessary social and community infrastructure to support new and existing communities. The Council will undertake a review and ensure that the Regulation 19 Publication version of the Local Plan includes strong, clear, and effective policies to protect existing local services and retail provision, support the enhancement and expansion of services where needed, and ensure that development contributes to vibrant, sustainable, and well-served communities across Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Social Infrastructure	Recommendation that any construction associated with growth arising from the Local Plan should not impact existing residents negatively	The Council recognises that construction activity can have temporary adverse impacts on existing communities including noise, dust, air quality, traffic congestion, highway safety, access disruption, and amenity impacts, and that these impacts must be appropriately managed, mitigated, and minimised through planning conditions, construction management plans, and regulatory controls to protect the health, safety, and quality of life of existing residents. The Draft Local Plan includes policies requiring high-quality design that respects amenity (Policy JBF1, Delivering a Better Future for Hertsmere and supporting policies) protects environmental quality including air quality and minimises pollution, requires sustainable construction practices (SD1 and supporting policies) and ensures that development proposals are accompanied by appropriate assessments and mitigation measures to address environmental, amenity, and operational impacts. Major developments will require the submission and approval of Construction Management Plans / Construction Environmental Management Plans setting out measures to control construction traffic routing, hours of operation, noise, dust, vibration, pollution, site access, waste management, and neighbour liaison. The Council will work with developers, contractors, and enforcement services to ensure that construction activity associated with growth is appropriately managed and that existing residents are protected from unacceptable impacts during the construction phase of developments allocated or permitted under the Local Plan.
Infrastructure (other than transport)	General opinion/view	Recommendation that housing should not be developed before key infrastructure is delivered	The Council recognises that ensuring adequate infrastructure provision, including transport, education, healthcare, utilities, green infrastructure, community facilities, and digital connectivity, is essential to support sustainable development, mitigate the impacts of growth on existing communities and services, and ensure that new developments are well-integrated, accessible, and create high-quality places. The Draft Local Plan is supported by an Infrastructure Delivery Plan (IDP) which identifies the infrastructure required to support the proposed growth, assesses the capacity of existing infrastructure, sets out the timing, cost, funding sources, and delivery responsibilities for necessary infrastructure improvements and new provision, and informs the Plan's policies on infrastructure delivery, developer contributions, and phasing of development. The Plan's policies on infrastructure provision and planning obligations (policies SC11, DM2 and DM3) will require developments to deliver or contribute to necessary infrastructure in a timely manner and the Council will continue to work with infrastructure providers, statutory bodies, and developers to coordinate and secure timely infrastructure delivery to support the sustainable growth of Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Infrastructure (other than transport)	Green/blue infrastructure	Support for green infrastructure in development proposed	<i>The Council recognises that green infrastructure, provides essential environmental, social, economic, and health benefits. The Draft Local Plan includes proposed policies requiring new development to incorporate high-quality green infrastructure (Policy GI1), protect and enhance existing green spaces, trees, and hedgerows (Policy GI6), deliver biodiversity net gain (Policy GE1), provide sustainable drainage systems (Policy SD8), and ensure that major developments provide accessible open space and play facilities appropriate to the scale and character of development (Policy GI7). The Council will ensure that site allocation policies include specific requirements for green infrastructure provision tailored to the characteristics, opportunities, and constraints of each site, will work with developers and stakeholders to maximise the quality, connectivity, multifunctionality, and long-term management of green infrastructure, and will ensure that the Regulation 19 Publication version of the Local Plan strongly supports the provision of green infrastructure as an integral component of sustainable, healthy, and resilient development across Hertsmere.</i>
Infrastructure (other than transport)	Social Infrastructure	Concern local plan does not identify how healthcare infrastructure will be planned and delivered	<i>The Draft Local Plan includes proposed strategic policies on infrastructure delivery (Policies SC11, DM2 and DM3) requiring development to be supported by adequate infrastructure capacity including healthcare, with infrastructure requirements identified through the Infrastructure Delivery Plan prepared in consultation with the NHS Central East Integrated Care Board, other healthcare providers, and relevant stakeholders, and with healthcare infrastructure secured through planning obligations, Community Infrastructure Levy, and coordination with healthcare commissioners and providers. The Council will ensure that the Regulation 19 Publication version of the Local Plan and accompanying Infrastructure Delivery Plan clearly demonstrate how healthcare infrastructure will be planned, funded, and delivered to support new development and meet the needs of Hertsmere's growing and changing population.</i>
Infrastructure (other than transport)	Social Infrastructure	Concern that plan does not take advantage of national funding and programme opportunities with regard to health infrastructure	<i>The Draft Local Plan Infrastructure Delivery Plan identifies infrastructure requirements arising from planned development including healthcare capacity needs, sets out anticipated delivery mechanisms and funding sources including developer contributions, public sector investment, and partnership arrangements, and has been prepared in consultation with infrastructure providers including the NHS Integrated Care Board to align planned development with healthcare service planning and capital investment programmes. The Council will continue to work with NHS commissioners and healthcare providers to identify relevant national funding programmes, capital investment opportunities, NHS estate strategies, and government initiatives that could support healthcare infrastructure delivery, and to align Local Plan delivery with NHS planning cycles, capital programmes, and funding bids.</i>
Infrastructure (other than transport)	Social Infrastructure	Request for Policy SC13 to be revised to ensure play provision and access to sports is provided equally across both the male and female gender as well as giving consideration to ensuring appropriate distribution across age and ability	<i>Policy SC13 will require new residential development to provide or contribute towards sports, recreation and play provision that is accessible and inclusive to all, which includes people of all genders. Provision will be informed by an up-to-date Outdoor Sports and Playing Pitch Study and Indoor Sports Study which will ensure that needs are being met across the borough, giving proper consideration to people of different ages and ability.</i>

Theme	Sub-Theme / Issue	Summary	Response
Local Plan Process/Planning Process	Consultation Process	General support for the consultation process on the Local Plan	The Council welcomes this support for the consultation process on the Local Plan. The Council is committed to ensuring meaningful and inclusive community engagement throughout the plan-making process, providing opportunities for residents, businesses, stakeholders, and interested parties to participate in shaping the future development of Hertsmere, and ensuring that the Local Plan reflects the needs, priorities, and aspirations of the local community. The Council will continue to engage with the community and stakeholders as the Local Plan progresses through the Regulation 19 stage, submission to the Planning Inspectorate, examination in public, and adoption, ensuring transparency, accessibility, and responsiveness throughout the process to deliver a sound, legally compliant, and community-supported Local Plan for Hertsmere.
Local Plan Process/Planning Process	Consultation Process	General concern about / objection to the consultation process on the Local Plan	The Council is committed to ensuring meaningful, inclusive, and legally compliant community engagement throughout the plan-making process, providing fair and accessible opportunities for residents, businesses, stakeholders, and interested parties to participate in shaping the future development of Hertsmere. The Council has undertaken consultation on the Draft Local Plan including public exhibitions, online consultation materials, stakeholder engagement, and opportunities to submit written representations, seeking to ensure that all interested parties have been able to make their views known. The Council remains committed to transparency, inclusivity, and responsiveness throughout the plan-making process, and will ensure that the Regulation 19 Publication stage and subsequent stages provide appropriate opportunities for participation, with all representations given due consideration in preparing a sound, legally compliant, and community-informed Local Plan for Hertsmere.
Local Plan Process/Planning Process	Consultation Process	Request for consultation process to be more open, transparent, accessible, inclusive and/ or more widely publicised to local residents.	The Council is committed to ensuring meaningful, inclusive, and accessible community engagement throughout the plan-making process, reaching as wide an audience as possible, and providing clear and accessible information and opportunities for participation. The Council has undertaken consultation on the Draft Local Plan including public exhibitions, online consultation portal, social media, press releases, direct notification to registered stakeholders, and opportunities to submit written representations, but recognises that there may be opportunities to improve the openness, transparency, accessibility, inclusivity, and reach of future consultation stages. The Council will carefully consider all feedback regarding how the consultation process can be enhanced and is committed to ensuring that the Regulation 19 Publication stage and subsequent consultation stages are as open, transparent, accessible, and inclusive as possible, reaching all sections of the community and enabling full and informed participation in the plan-making process for Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Local Plan Process/Planning Process	Consultation Process	Lack of policy wording means it is difficult to comment on the draft Plan.	The Council acknowledges that the policies are presented in outline form at this stage, with further refinement, additional detail, and clarification to be incorporated in the Regulation 19 Publication version of the Draft Local Plan. The purpose of the Regulation 18 consultation has been for consultees to provide comments on the principles, approach and content of the Draft Local Plan. The Council will carefully consider all feedback received and there will be a further opportunity to comment on the full and detailed policy wording at the Regulation 19 Publication stage before the Plan is submitted for examination.
Local Plan Process/Planning Process	Consultation Process	Concern about the number of consultation processes on the Local Plan and the amount of involvement in planning expected of residents	The Council has considered previous feedback in its current draft Plan. However, the context has changed since earlier versions, including changes to national planning policy, housing need, and wider economic and social changes, making a new Plan necessary in line with government requirements. The Council appreciates the time and effort offered by residents in responding to consultation efforts, and wishes to take local views into account, while also having to comply with government requirements regarding plan making and engagement on each plan published.
Local Plan Process/Planning Process	Council decision-making	Appeal for the Council to prioritise the wishes of existing residents in decision-making	The Council wishes to and is obliged to take into account views of existing residents as well as to plan for future needs, which include those of existing as well as future residents. The Council is also obliged by national policy and legislation to plan for housing and other needs which will arise during the Plan period. The Council will take residents' and other representations received into account when writing the Regulation 19 version of the Local Plan. However, HBC will still be bound by national policy and legislation, as well as by the results of technical evidence (in terms of available housing land supply, environmental constraints, identified needs etc), which limits what the Council is able to propose in its Local Plan. Equally, the Council is bound to assess and approve planning applications based on material considerations in line with planning policy and legislation, particularly where the Council has struggled in the past to meet its identified needs for housing and/or economic development. Objections from residents and councillors can only lead to a refusal if they are justified through material planning considerations. Where a refusal is deemed unreasonable, applicants can appeal the decision.
Local Plan Process/Planning Process	Council decision-making	General concern about Council's approach to decision-making	<i>The Council makes planning decisions in accordance with the statutory development plan and material considerations, as required by planning legislation. The planning system balances competing interests and must consider national policy, local evidence, and the merits of individual proposals. The Council's approach to decision-making is subject to scrutiny through the planning appeals process and judicial review, ensuring accountability and legal compliance.</i>

Theme	Sub-Theme / Issue	Summary	Response
Local Plan Process/Planning Process	Council decision-making	Concern regarding experience / competence of officers making planning decisions	<i>Planning decisions are made by qualified planning officers with relevant professional experience and qualifications. Officers provide recommendations based on material planning considerations, national policy, and local plan policies. Significant decisions are determined by the Planning Committee, comprising elected members who receive training on planning matters. The Council's decision-making processes follow national regulations and guidance, and decisions can be appealed if they are considered unreasonable.</i>
Local Plan Process/Planning Process	Council decision-making	Concern regarding planning committee's political allegiances affecting planning decisions	<i>Planning Committee members are required to make decisions based on material planning considerations, national policy, and the development plan, regardless of political affiliation. Members receive training on their roles and responsibilities and must follow the Members' Code of Conduct. Planning decisions that are not made in accordance with proper procedures can be challenged through the appeals process or judicial review. The Council is committed to ensuring that planning decisions are made fairly, transparently, and in accordance with planning law.</i>
Local Plan Process/Planning Process	Council decision-making	General support for Council's approach to decision-making	<i>The Council welcomes support for its approach to planning decision-making. The Council is committed to making decisions that balance competing interests, follow national policy and local evidence, and deliver sustainable development that meets the needs of existing and future residents.</i>
Local Plan Process/Planning Process	Decision-making process	General support for how the local plan will be used to inform decisions	<i>The Council welcomes support for the Local Plan's role in informing planning decisions. Once adopted, the Local Plan will form part of the statutory development plan and will be the starting point for determining planning applications, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.</i>
Local Plan Process/Planning Process	Decision-making process	General concern for how the local plan will be used to inform decisions	<i>The Local Plan will be used to inform planning decisions in accordance with the Planning and Compulsory Purchase Act 2004. Once adopted, planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise. The Plan provides clear policies against which proposals will be assessed, providing certainty for applicants and communities. The Council is committed to implementing the Plan effectively through its decision-making processes.</i>
Local Plan Process/Planning Process	Decision-making process	Requirement that MOD should be consulted on any wind energy infrastructure applications that exceed 11m or have a rotary blade diameter of greater than 2m and any solar energy infrastructure applications in the vicinity of aerodromes and airports.	<i>Policy TR7 protects the operational integrity and safety of safeguarded civil and military aerodromes, including the safeguarding context associated with RAF Northolt. Relevant proposals are subject to the applicable statutory safeguarding and consultation requirements.</i>

Theme	Sub-Theme / Issue	Summary	Response
Local Plan Process/Planning Process	Decision-making process	Recommendation that policy should not duplicate requirements for planning applications already set out in the Local Validation Checklist	<i>The Council recognises that Local Plan policies should set out clear policy requirements, principles, and criteria against which planning applications will be assessed, whilst avoiding unnecessary duplication of procedural or validation requirements that are more appropriately set out in the Local Validation Checklist, planning application guidance, or other supplementary documents. The Council will ensure that the Regulation 19 Publication version of the Local Plan provides clear policy direction and requirements without unnecessary duplication, that the Local Validation Checklist and other guidance documents appropriately set out submission and validation requirements, and that there is clear signposting between policies and supporting guidance to assist applicants, decision-makers, and other users of the Plan in understanding policy requirements and application procedures across Hertsmere.</i>
Local Plan Process/Planning Process	Evidence	Concern about the evidence to support the plan	<i>The Council recognises that Local Plans must be based on a robust, proportionate, and up-to-date evidence base that addresses the key issues and opportunities facing the area, informs policy development and site allocations, and demonstrates that the Plan's strategy and policies are justified, effective, and consistent with national policy. The Draft Local Plan has been informed by a comprehensive evidence base including the Housing and Economic Land Availability Assessment (HELAA), Housing and Economic Development Needs Assessment (HEDNA), Infrastructure Delivery Plan, Green Belt Study, Sustainability Appraisal, Habitats Regulations Assessment, Transport Assessment, Strategic Flood Risk Assessment, and topic-specific studies covering heritage, landscape, ecology, air quality, viability, and other material considerations. The Council will carefully consider all representations raising concerns about the adequacy, robustness, methodology, or conclusions of evidence base documents, will review whether any evidence requires updating, additional work, or independent review to ensure it is fit for purpose and supports the Plan's strategy and policies</i>

Theme	Sub-Theme / Issue	Summary	Response
Local Plan Process/Planning Process	Evidence	General opposition to policies because they do not reference and/ are missing key evidence	<i>The Council recognises that Local Plan policies must be underpinned by a robust, proportionate, and up-to-date evidence base that addresses the key issues and opportunities facing the area, informs policy development, demonstrates that policies are justified by appropriate analysis and reasonable alternatives have been considered, and ensures that policies are effective and deliverable. The Draft Local Plan has been informed by a comprehensive evidence base covering housing and economic needs, site availability and deliverability, infrastructure requirements, Green Belt assessment, sustainability appraisal, habitats regulations assessment, transport, flood risk, heritage, landscape, ecology, air quality, viability, and other material considerations, with policies developed based on this evidence and supported by explanatory text that references key evidence documents. The Council will review whether policy wording, supporting text, or evidence base documents require amendment, clarification, or additional work to ensure that all policies are appropriately evidenced and justified, and will ensure that the Regulation 19 Publication version of the Local Plan includes clear cross-references between policies and supporting evidence, and that any identified evidence gaps are addressed to ensure that the Plan is robustly evidenced and capable of being found sound at examination.</i>
Local Plan Process/Planning Process	Evidence	Support for infrastructure delivery plan (IDP) in identifying infrastructure requirements.	<i>The Council welcomes the support for the Infrastructure Delivery Plan (IDP) in identifying infrastructure requirements. The Council recognises that strategic planning for infrastructure is essential to support sustainable growth, ensure that development is supported by adequate physical, social, and green infrastructure, and demonstrate that the Local Plan strategy is deliverable and effective. The Council is committed to working closely with infrastructure providers including Hertfordshire County Council, the Integrated Care Board, utility companies, emergency services, and other stakeholders to ensure that infrastructure is planned, funded, and delivered in a timely and coordinated manner to support sustainable growth, and will continue to update and refine the Infrastructure Delivery Plan as the Local Plan progresses through examination and implementation, ensuring that infrastructure delivery remains on track and responsive to changing needs and circumstances across Hertsmere.</i>
Local Plan Process/Planning Process	Evidence	Recommendation that a separate cost input for health infrastructure in the whole plan viability assessment would ensure that healthcare mitigation is appropriately weighted when evaluating the potential planning obligations necessary to mitigate the full impact of a development. This should be reflected and updated accordingly within both the draft IDP and the Local Plan to ensure accuracy and alignment with the current NHS organisational structure.	<i>The Draft Local Plan whole plan viability assessment has been prepared in accordance with national planning guidance to test whether the cumulative impact of policy requirements and infrastructure contributions would render development unviable, with infrastructure requirements and anticipated funding mechanisms including developer contributions identified in the Infrastructure Delivery Plan. The Council will carefully consider this recommendation that health infrastructure costs should be separately identified and costed within the whole plan viability assessment and ensure that the Local Plan is supported by a robust evidence base that provides a sound justification for the employment land requirement</i>

Theme	Sub-Theme / Issue	Summary	Response
Local Plan Process/Planning Process	Evidence	Opposition to the approach taken in the Economic Study 2026 as it omits a number of key considerations such as the lack of an employment land uptake model; downward adjustments on future long-term need because of short term high vacancy rate; lack of incorporation of strategic scale logistics need; and recommendation of a labour demand model.	<i>The Draft Local Plan employment land requirement has been informed by the Economic Study 2026, which assesses future employment land needs using standard methodologies including labour demand forecasting based on econometric projections of job growth, past employment land take-up trends, and consideration of qualitative factors such as market signals, economic strategies, sector-specific requirements, strategic employment locations, and consultation with businesses, commercial agents, and economic development stakeholders. The Council will carefully consider this representation raising concerns about the methodology and assumptions underpinning the Economic Study 2026</i>
Local Plan Process/Planning Process	Plan-making process (general)	General support for the proposed plan making process	<i>The Council welcomes the support for the proposed plan-making process. The Council is committed to preparing a sound, legally compliant, and community-supported Local Plan through a transparent, inclusive, and evidence-based plan-making process that meets the requirements of national legislation and policy, engages effectively with the community and stakeholders, and delivers a strategic vision and policy framework for sustainable development across Hertsmere to 2041. The plan-making process has included evidence gathering, strategic options assessment, Regulation 18 consultation on the Draft Local Plan, and will progress through consideration of representations, preparation of the Regulation 19 Publication version, submission to the Planning Inspectorate, examination in public, and adoption. The Council will continue to ensure that the plan-making process is conducted with transparency, rigour, and inclusivity, that all representations are carefully considered and inform refinement of the Plan, that the evidence base is comprehensive and robust, and that the community and stakeholders have meaningful opportunities to participate at each stage, delivering a Local Plan that meets the development needs of Hertsmere whilst protecting and enhancing the environment, heritage, and quality of life for current and future generations.</i>

Theme	Sub-Theme / Issue	Summary	Response
Local Plan Process/Planning Process	Plan-making process (general)	General concern about / objection to the proposed plan making process	<i>The Council is committed to preparing a sound, legally compliant, and community-supported Local Plan through a transparent, robust, and inclusive plan-making process that meets the requirements of national legislation and policy, engages effectively with the community and stakeholders, and is capable of examination against the tests of soundness. The plan-making process has included evidence gathering, strategic options assessment, Sustainability Appraisal, Habitats Regulations Assessment, and Regulation 18 consultation on the Draft Local Plan, and will progress through consideration of representations, preparation of the Regulation 19 Publication version, submission to the Planning Inspectorate, examination in public, and adoption. The Council will carefully consider all feedback raising concerns about the plan-making process, including concerns about methodology, evidence base, consultation approach, assessment of alternatives, legal compliance, procedural matters, or alignment with the duty to cooperate, and will reflect on whether any improvements, additional work, or adjustments are necessary to ensure full compliance with legal and procedural requirements and best practice. The Council remains committed to transparency, rigour, and responsiveness throughout the plan-making process, ensuring that all representations are given due consideration, that the evidence base is comprehensive and robust, and that the Local Plan is prepared in accordance with statutory requirements and capable of being found sound and legally compliant at examination.</i>
Local Plan Process/Planning Process	Plan-making process (general)	General concern about / objection to the proposed plan period	<i>The Draft Local Plan covers the period from 2026 to 2041, providing a 15-year planning horizon from the anticipated adoption date, which is consistent with national policy requirements. The Council considers that 15 years provides an appropriate timeframe to plan for housing and economic development needs, infrastructure delivery, environmental protection, and community facilities across Hertsmere. Where appropriate the Council will ensure that policies include appropriate flexibility and trigger points for early review to ensure the Plan remains effective and responsive to changing circumstances throughout the plan period.</i>
Local Plan Process/Planning Process	Plan-making process (general)	General opposition to the Local Plan, asserting that the process has not been completed in a legal manner	<i>The Council is committed to preparing a sound and legally compliant Local Plan in accordance with all statutory requirements and procedural regulations. The plan-making process has included appropriate evidence gathering, assessment of reasonable alternatives, Sustainability Appraisal, Habitats Regulations Assessment, consultation in accordance with the Statement of Community Involvement and Regulation 18 requirements, and cooperation with neighbouring authorities and prescribed bodies under the duty to cooperate. The Council will ensure that the Regulation 19 Publication version and submission of the Local Plan for examination meet all legal and procedural requirements, that the Plan is accompanied by appropriate supporting documents including consultation statements, and that the Plan is capable of being found legally compliant and sound by an independent Planning Inspector at examination.</i>

Theme	Sub-Theme / Issue	Summary	Response
Local Plan Process/Planning Process	Plan-making process (general)	General opposition to the Local Plan, as not complying with local wishes	The Council will take residents' and other representations received into account when writing the Regulation 19 version of the Local Plan. However, HBC will still be bound by national policy and legislation, as well as by the results of technical evidence (in terms of available housing land supply, environmental constraints, identified needs etc), which limits what the Council is able to propose in its Local Plan.
Local Plan Process/Planning Process	Plan-making process (general)	Concern regarding qualifications, competence, and / or independence of officers writing the plan	<i>The Council's Local Plan has been prepared by qualified planning professionals with relevant experience in plan-making, supported by specialist consultants and technical evidence from appropriate experts. The plan-making process follows statutory requirements and national guidance, with governance oversight from elected members. The Council is confident that the Plan is being prepared to a professional standard that will meet the tests of soundness at examination.</i>
Local Plan Process/Planning Process	Plan-making process (general)	General opposition to the Local Plan due to a perceived lack of transparency	<i>The Council is committed to transparency in the plan-making process. All consultation materials, evidence documents, and committee reports are published on the Council's website. The consultation process follows national regulations, providing opportunities for residents and stakeholders to comment on the Plan at each stage. The Council publishes a Consultation Statement setting out how representations have been considered, demonstrating transparency and accountability in decision-making.</i>
Local Plan Process/Planning Process	Plan-making process (general)	Concern regarding councillors' individual agendas affecting their involvement in the plan making process	<i>Elected members have a democratic mandate to represent their constituents and make planning decisions in the public interest. Members are required to follow the Members' Code of Conduct and to declare any interests. Planning decisions must be made on material planning considerations in accordance with national policy and local evidence. The Local Plan will be subject to independent examination by a Planning Inspector appointed by the Secretary of State, ensuring it meets legal and soundness requirements regardless of individual member views.</i>
Local Plan Process/Planning Process	Plan-making process (general)	Neighbouring plan-making authority supports ongoing engagement to fulfil effective engagement requirement.	<i>The Council welcomes the support for ongoing engagement from neighbouring planning authorities. The Council is committed to continuing constructive cooperation on strategic cross-boundary matters throughout the plan-making process, in accordance with national policy requirements following the abolition of the formal Duty to Cooperate.</i>
Local Plan Process/Planning Process	Plan-making process (general)	Support from statutory body for ongoing engagement with the Council through the next stages of plan making.	<i>The Council welcomes the support from statutory bodies and is committed to maintaining ongoing engagement through the Regulation 19 and examination stages of plan-making. This collaborative approach ensures that the Plan is informed by the expertise and requirements of statutory consultees and delivers sustainable development.</i>

Theme	Sub-Theme / Issue	Summary	Response
Local Plan Process/Planning Process	Plan-making process (general)	Support from non-statutory stakeholder for ongoing engagement with the Council through the next stages of plan making.	<i>The Council values the contributions and expertise of non-statutory stakeholders in informing policy development, site assessments, evidence gathering, and implementation planning, and will continue to engage proactively with stakeholders as the Local Plan progresses through consideration of Regulation 18 representations, preparation of the Regulation 19 Publication version, submission to the Planning Inspectorate, examination in public, adoption, and subsequent implementation and monitoring. The Council encourages all stakeholders to remain actively engaged throughout the process, to submit representations at Regulation 19 and participate in the examination if appropriate, and to continue working collaboratively with the Council on delivery of infrastructure, sustainable development, environmental protection, and community priorities across Hertsmere.</i>
Local Plan Process/Planning Process	Plan-making process (general)	The Council must undertake a cooperation exercise on cross boundary matters to include matters raised.	<i>The Council recognises its responsibility to cooperate with neighbouring authorities on strategic cross-boundary matters, in accordance with national policy. The Council has engaged and will continue to engage with relevant authorities on matters including housing need, employment land, transport infrastructure, environmental protection, and service provision. Statements of Common Ground will be prepared where appropriate to document areas of agreement and any outstanding issues</i>
Local Plan Process/Planning Process	Plan-making process (general)	Concern that the draft Local Plan is not sound.	<i>The Council is preparing the Local Plan to meet the tests of soundness set out in the NPPF paragraph 35: that it is positively prepared, justified, effective and consistent with national policy. The Plan is supported by a comprehensive evidence base, has been subject to Sustainability Appraisal, and will be submitted for independent examination. The Council will consider all representations received and make necessary amendments to ensure the Plan is sound and legally compliant.</i>
Local Plan Process/Planning Process	Plan-making process (general)	Concern that the proposals are not in conformity with national planning policy.	<i>The Council has prepared the Local Plan in accordance with the National Planning Policy Framework (NPPF) and national Planning Practice Guidance. The Plan's policies and site allocations are informed by the most recent national policy and will be reviewed to ensure conformity with any updates to national policy prior to submission for examination. The Plan will be tested for soundness against national policy requirements by an independent Planning Inspector.</i>
Local Plan Process/Planning Process	Plan-making process (general)	General concern that Hertsmere have not carried out the duty to cooperate with neighbouring authorities.	<i>The Council has engaged with neighbouring authorities and statutory bodies throughout the plan-making process on strategic cross-boundary matters. While the formal Duty to Cooperate has been abolished, the Council remains committed to effective cooperation on matters such as housing, employment, transport, and environmental protection. This engagement is documented through meeting records and Statements of Common Ground, demonstrating that the Council has worked constructively to address strategic issues.</i>

Theme	Sub-Theme / Issue	Summary	Response
Local Plan Process/Planning Process	Plan-making process (general)	Concern that the proposals in the plan are inappropriate / premature due to imminent local government reorganisation	<i>The Council is required to prepare a Local Plan under planning legislation to guide development in the Borough. While decisions and changes regarding local government reorganisation is awaited, the Council must continue to plan for its area until any changes take effect. The Plan will provide an up-to-date policy framework regardless of future administrative changes. Any reorganisation can be addressed through subsequent plan reviews if necessary, in accordance with national policy. Putting a Plan in place for the current Hertsmere geography will also help to ensure that the interests of Hertsmere are embedded in planning decisions in any future, wider geography.</i>
Local Plan Process/Planning Process	Plan-making process (general)	Concerns that insufficient progress will have been made on addressing key challenges related to Bowmans Cross before publication of the Regulation 19 publication and submission.	<i>The Council is undertaking comprehensive evidence gathering and masterplanning work to address the challenges associated with Bowmans Cross, including transport access, infrastructure provision, environmental mitigation, and delivery phasing. The Regulation 19 Plan will be supported by updated evidence demonstrating that these challenges can be addressed and that the site can be delivered sustainably over the plan period. Ongoing technical work will inform detailed allocation policies for the site.</i>
Local Plan Process/Planning Process	Site selection	Concern over proposed policies not being considered adequately in the site selection process	<i>The Council's site selection process has been informed by the Plan's emerging policies, including those on design, environment, heritage, infrastructure, and transport. The Sustainability Appraisal assesses sites against policy objectives to ensure allocations are compatible with the Plan's strategy. Site-specific policies will include requirements to address constraints and deliver policy objectives. The Council will review site selection to ensure it fully reflects policy requirements for the Regulation 19 Plan.</i>
Local Plan Process/Planning Process	Plan-making process (general)	Recommendation to ensure policy is in line with national policy / does not duplicate national policy requirements	<i>The Draft Local Plan has been prepared in accordance with national policy and guidance. As part of preparing the Regulation 19 Publication version of the Local Plan the Council will undertake a review to ensure that all local policies are aligned with national policy, including the National Planning Policy Framework published following the conclusion of this Regulation 18 consultation, to minimise duplication of requirements and standards where relevant and possible, considering the timeframes of the emerging Local Plan.</i>
Local Plan Process/Planning Process	Site selection	Concern that that the Council is not meeting its Public Sector Equality Duty, of explicitly assessing the impacts of development on proposed sites on persons with protected characteristics (e.g. disabled persons)	<i>The Council is committed to meeting its Public Sector Equality Duty under the Equality Act 2010. The Sustainability Appraisal includes assessment of impacts on equalities and social inclusion. The Plan includes policies requiring accessible and inclusive design for all development. The Council will ensure that the Equality Impact Assessment explicitly considers the impacts of site allocations on persons with protected characteristics, including disabled persons, older people, and other groups, to inform policy development and site selection for the Regulation 19 Plan.</i>
Local Plan Process/Planning Process	Site selection	Technical reports missing which limits residents' ability to comment on sites	<i>The Council acknowledges that additional technical evidence is being prepared to inform the Regulation 19 Plan. Key studies including transport modelling, Heritage Impact Assessments, and updated infrastructure planning will be published to support the next consultation stage. This will ensure that residents and stakeholders have access to comprehensive evidence on which to base their representations on proposed site allocations.</i>

Theme	Sub-Theme / Issue	Summary	Response
Local Plan Process/Planning Process	Site selection	Suitable locations for housing to meet the needs of specific local groups, such as key workers (e.g. NHS staff), should be explored as part of the site selection process.	<i>The Local Housing Needs Assessment considers the needs of different groups within the Borough. Policies H1 and H3 seek an appropriate mix of housing and maximise the delivery of genuinely affordable housing in response to identified housing need</i>
Local Plan Process/Planning Process	Site selection	Viability assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the borough. This enables an informed judgement about which developments would be able to deliver the range of infrastructure required.	<i>The Council agrees that viability is a key consideration in site selection. The Whole Plan Viability Assessment tests the Plan's policies and site typologies to ensure they are deliverable. Site selection is informed by viability evidence alongside environmental, heritage, infrastructure, and deliverability considerations. The Council will ensure that site allocations are viable and can deliver required infrastructure, affordable housing, and other planning obligations, informed by the viability assessment.</i>
Local Plan Process/Planning Process	Site selection	Recommendation that greater consideration should be given to the cumulative impacts of multiple allocations.	<i>The Council recognises the importance of assessing cumulative impacts of multiple allocations, particularly on transport, infrastructure, environment, and community facilities. The Sustainability Appraisal, Transport Study, Infrastructure Delivery Plan, and other evidence documents consider cumulative impacts. The Plan will include policies requiring consideration of cumulative impacts in planning decisions, and the Council will monitor development to ensure cumulative impacts are managed effectively.</i>
Local Plan Process/Planning Process	Site selection	Opposition to proposed allocation because there are more suitable alternative sites.	<i>The Council's site selection process assesses all reasonable alternative sites through the Housing and Employment Land Availability Assessment, Sustainability Appraisal, and technical evidence. Sites are selected based on their suitability, availability, achievability, and performance against sustainability criteria. The Council will consider all representations on site selection and review the evidence to ensure the most appropriate sites are allocated in the Regulation 19 Plan.</i>
Local Plan Process/Planning Process	Plan-making process (general)	Recommendation for The Council to use legal mechanisms to compel developers to build out permitted sites	<i>The Council has limited powers to compel developers to build out permitted sites. However, the Council can consider using Completion Notices under Section 94 of the Town and Country Planning Act 1990 where development has commenced but not been completed within a reasonable time. The Council could also use Compulsory Purchase powers where this would facilitate development to meet identified needs, subject to demonstrating that this represents value for money and is in the public interest. The Plan will focus on ensuring a robust housing trajectory with a range of sites to provide flexibility and resilience.</i>

Theme	Sub-Theme / Issue	Summary	Response
Local Plan Process/Planning Process	Plan-making process (general)	General opinion that withholding future planning permissions from "underperforming" developers is legally dubious and impractical because permissions run with the land, so stronger options are land value taxation or time-limited delivery conditions on major consents	<i>The Council recognises that planning permissions are interests in land that run with the land rather than the applicant, and that the planning system must operate within the legal framework established by the Town and Country Planning Act 1990 and related legislation. The Draft Local Plan seeks to ensure timely and effective delivery of development through policies that support the delivery of the spatial strategy, monitoring mechanisms to track housing delivery against targets including through the Housing Delivery Test, and engagement with developers and landowners to understand and address barriers to delivery, whilst the Council can use planning conditions to control the timing and phasing of development, require commencement within specified periods, use Section 106 agreements to secure delivery obligations and review mechanisms, and where appropriate pursue enforcement action or consider compulsory purchase powers to bring forward stalled sites. The Council will carefully consider this representation regarding developer performance and delivery mechanisms and will review the legal and practical options available to encourage and secure timely delivery of allocated sites and permitted developments. It is noted that land value taxation is a fiscal measure beyond local planning authority powers and that any delivery mechanisms must operate lawfully within the statutory planning framework.</i>
Local Plan Process/Planning Process	Evidence	Request for The Council to confirm whether additional evidence is being undertaken to support the proposed allocation	<i>As part of the site allocation process developers and site promoters have had to provide evidence that site allocations are deliverable, viable and supported by robust technical assessment covering highways and transport impacts, environmental constraints, heritage impacts, landscape and visual effects, flood risk and drainage, utilities and infrastructure capacity, contamination and remediation, ecology and biodiversity, and any other material considerations. The Council will review consultation responses received during the Regulation 18 consultation stage and confirm whether any additional evidence or further assessment is required for specific candidate sites.</i>
Local Plan Process/Planning Process	Plan-making process (general)	Parish Council request support from the Council for producing an updated Neighbourhood Plan	<i>The Shenley Neighbourhood Plan has been produced by Shenley Parish Council and is already a material consideration in the determination of planning applications within the neighbourhood area. The Borough Council will support Neighbourhood Planning groups as far as possible within its available resources, to produce new Neighbourhood Plans where they seek to do so, taking a proactive and positive approach, working collaboratively with the relevant qualifying body, sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success.</i>
Local Plan Process/Planning Process	Plan-making process (general)	Concern about speculative development in the green belt and a lack of a robust emerging Plan to address this	<i>The draft Local Plan seeks to improve the Council's housing land supply position from the point of adoption to avoid speculative development across Hertsmere. Allocations are proposed to ensure a robust housing land supply.</i>
No comment			N/A

Theme	Sub-Theme / Issue	Summary	Response
Places & Growth Sites	Borehamwood - Omission Site	Site is suitable and available for allocation in the plan but has been omitted from the strategy for the Borehamwood area.	<i>The Council has assessed all reasonable alternative sites through the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Site selection is based on sustainability, deliverability, infrastructure capacity, environmental constraints and contribution to the spatial strategy. Sites not allocated have been found to perform less favourably against these criteria or present significant constraints. The Council will review all representations on omission sites when preparing the Regulation 19 Plan.</i>
Places & Growth Sites	Bushey - Omission Site	Site is suitable and available for allocation in the plan but has been omitted from the strategy for the Bushey area.	<i>The Council has assessed all reasonable alternative sites through the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Site selection is based on sustainability, deliverability, infrastructure capacity, environmental constraints and contribution to the spatial strategy. Sites not allocated have been found to perform less favourably against these criteria or present significant constraints. The Council will review all representations on omission sites when preparing the Regulation 19 Plan.</i>
Places & Growth Sites	Delivery	Submission of evidence that the site is suitable, available and achievable and therefore developable and deliverable.	<i>The Council welcomes evidence submissions demonstrating site suitability, availability and achievability. All evidence will be considered through the Housing and Employment Land Availability Assessment process and will inform site selection for the Regulation 19 Plan, in accordance with national Planning Practice Guidance on Housing and Economic Land Availability Assessment.</i>
Places & Growth Sites	Delivery	Concern about the amount of affordable housing that could be delivered due to the tension between mitigation costs and viability. Compromises on mitigation and affordable housing should not be accepted to improve viability.	<i>The Council will include a comprehensive monitoring framework in the Local Plan, setting out indicators, targets, and triggers for policy review. An Annual Monitoring Report will track implementation of policies and delivery of allocations, identifying any issues that require corrective action. This approach ensures the Plan remains effective and responsive to changing circumstances over the plan period, in accordance with national policy requirements.</i>
Places & Growth Sites	Delivery	Concerns about proposed processes for monitoring the future implementation / impact of the Local Plan, its policies and allocations	<i>The Council recognises that effective monitoring is essential to track the implementation of the Local Plan, assess whether policies are achieving their intended outcomes, identify any unforeseen impacts or delivery challenges, and provide an evidence base to inform future plan reviews and policy adjustments. The Draft Local Plan includes a draft monitoring framework setting out key indicators, targets, and triggers for policies covering housing delivery, employment land provision, infrastructure delivery, environmental quality, climate change mitigation and adaptation, heritage protection, biodiversity net gain, and other strategic and development management objectives, with monitoring to be reported through the Council's Authority Monitoring Report published annually. The Council will ensure that the Regulation 19 Publication version includes a comprehensive, effective, and deliverable monitoring framework that enables the Council to track plan implementation, assess policy effectiveness, respond to changing circumstances, and ensure accountability and transparency in delivering sustainable development across Hertsmere.</i>

Theme	Sub-Theme / Issue	Summary	Response
Places & Growth Sites	Delivery	Concern over the deliverability of Bowmans Cross due to the lack of publicly available information which sets out the mineral extraction, waste insertion, waste settlement and restoration processes	<i>The previous and in some case existing uses in the area of Bowmans Cross encompass a range of activities including quarrying, waste to energy production, offices, farming and equestrian businesses. The Council agree that clarity is needed on restoration and delivery timescales. The Council is working with the site operator and Hertfordshire County Council as Waste Planning Authority to establish the phasing of restoration and timing for development delivery. The Regulation 19 Plan will be supported by evidence demonstrating that the site can be delivered within the plan period and that restoration and development can proceed in a coordinated manner. Site-specific policies will address phasing requirements.</i>
Places & Growth Sites	General Opinion / View	Objection to / concern about development on site proposed	<i>The Council has assessed all proposed allocations through the site selection process, informed by the HELAA, Sustainability Appraisal, and technical evidence. The Council will consider all objections received and review site allocations in light of representations, updated evidence, and deliverability considerations for the Regulation 19 Plan. Sites will only be allocated where they are suitable, available, achievable, and can be delivered sustainably over the plan period.</i>
Places & Growth Sites	General Opinion / View	General support for development of the site/area to support new employment and economic growth within the area	<i>The Council welcomes support for site allocations that will deliver employment and economic growth. The Plan seeks to provide sufficient employment land in appropriate locations to meet identified needs over the plan period, supporting economic prosperity and job creation in accordance with national policy.</i>
Places & Growth Sites	General Opinion / View	General objection to any kind of development in this area / settlement	<i>The Council has to plan to meet identified housing and employment needs over the plan period in accordance with national policy and legislation. The spatial strategy directs development to the most sustainable locations, balancing the need to meet development requirements with protecting environmental assets and local character. The Council will consider all representations in finalising site allocations for the Regulation 19 Plan.</i>
Places & Growth Sites	General Opinion / View	Concern that proposed development will devalue existing housing stock in the area.	<i>The Council has to plan to meet identified housing and employment needs over the plan period in accordance with national policy and legislation. The planning system is concerned with land use in the public interest and cannot prevent development on the grounds that it may affect individual property values. The Plan seeks to ensure that all development is of high quality, well-designed, and appropriately integrated with existing communities. Property values are influenced by many factors and are not a material planning consideration in plan-making or decision-making.</i>
Places & Growth Sites	General Opinion / View	Concern that proposed development will impact businesses in the area.	<i>The Council recognises that development can have impacts on existing businesses, both positive and negative. The Plan's policies require development to protect employment land and town centre vitality, and to minimise adverse impacts on existing businesses during construction and operation. Where development generates significant impacts, appropriate mitigation will be required through planning conditions and obligations.</i>

Theme	Sub-Theme / Issue	Summary	Response
Places & Growth Sites	General Opinion / View	General support for development in this area / settlement	<i>The Council welcomes support for development in principle. The Plan seeks to deliver sustainable development that meets identified needs while protecting and enhancing environmental, social, and economic assets. The Council will work with communities and stakeholders to ensure development is well-planned and delivers benefits for existing and future residents.</i>
Places & Growth Sites	General Opinion / View	General support for development on site proposed	<i>The Council welcomes support for proposed site allocations. The Plan seeks to allocate sites that are deliverable, sustainable, and can contribute to meeting identified housing and employment needs over the plan period. The Council will continue to refine site allocation policies to ensure development delivers positive outcomes.</i>
Places & Growth Sites	General Opinion / View	Support for delivering more growth on site than proposed within the plan period	<i>The Council has assessed site capacities based on site constraints, environmental and heritage impacts, infrastructure capacity, and design considerations. Where evidence supports higher capacity on allocated sites without unacceptable impacts, the Council will consider increasing proposed allocations in the Regulation 19 Plan, subject to updated technical assessments and viability considerations.</i>
Places & Growth Sites	General Opinion / View	Objection to development of proposed site due to the impact on playing pitch provision and the absence of a full needs assessment in Potters Bar. Objection will stand until Playing Pitch Strategy has been published and informs site allocations.	<i>The Council is updating the Playing Pitch Strategy to inform the Regulation 19 Plan. Where sites include or are adjacent to playing pitches or sports facilities, the Plan will require replacement provision of equivalent or better quality and quantity in accordance with Sport England guidance and NPPF paragraph 104. Site allocation policies will be informed by the updated Playing Pitch Strategy and will ensure no net loss of sports facilities unless they are demonstrably surplus to requirements.</i>
Places & Growth Sites	General Opinion / View	No special circumstances to support development of a site in the Green Belt	<i>The Council is preparing an exceptional circumstances case to justify Green Belt release to meet identified housing and employment needs that cannot be met on non-Green Belt land. The Plan will demonstrate that all reasonable alternatives have been explored, that the Green Belt boundaries proposed will endure beyond the plan period, and that the release represents sustainable development in accordance with national policy. This case will be set out comprehensively in the Regulation 19 Plan and supporting evidence, including the Green Belt Assessment.</i>
Places & Growth Sites	General Opinion / View	Recommendation that policy outlines that where an MOD assessment indicates development will have a detrimental impact on MOD assets or operations that an application will either be refused or conditions would be attached to the permission.	<i>The Council notes the MOD's requirements regarding safeguarding of defence assets and operations. Site allocation policies for sites within MOD safeguarding zones will require consultation with the MOD and will state that development must not compromise MOD operations or defence assets. Where impacts are identified, appropriate mitigation or design amendments will be required, or planning permission may be refused if impacts cannot be satisfactorily addressed.</i>

Theme	Sub-Theme / Issue	Summary	Response
Places & Growth Sites	General Opinion / View	Concern/opposition to development on the proposed site due to the impact on visual receptors and landscape character	<i>The Council has assessed landscape and visual impacts of proposed allocations through landscape assessments and the Sustainability Appraisal. Site allocation policies will include requirements for landscape mitigation, including buffer planting, appropriate building heights and layout, and retention of landscape features. Development will be required to respond sensitively to landscape character and minimise visual impacts through careful design, in accordance with national policy and local landscape character assessments.</i>
Places & Growth Sites	General Opinion / View	Recommendation that the policy wording and requirements for allocations sites should mention the specific designated heritage assets present both on site and nearby and also refer to specific mitigation measures e.g. landscaping /buffers /setbacks, design measures, or protection of key views, identified by the relevant Heritage Impact Assessment (HIA) for the site. Recommended wording for developments which impact on designated heritage assets: "Development should conserve or where appropriate enhance the significance of heritage assets including [list heritage assets on site and nearby] including any contribution made to their significance by their settings. Appropriate mitigation measure including ... will be required."	<i>The Council will ensure that Heritage Impact Assessments inform site allocation policies for the Regulation 19 Plan. Where heritage assets are present on or near allocated sites, site-specific policies will identify the assets, set out their significance, and specify mitigation requirements including design measures, landscaping, buffers, setbacks, and protection of key views. This approach will ensure heritage assets are conserved or enhanced in accordance with national policy.</i>
Places & Growth Sites	General Opinion / View	Site specific concern about trees on the site that are protected by Tree Preservation Orders (TPOs).	<i>Site allocation policies will require development to retain trees protected by Tree Preservation Orders (TPOs) wherever possible. Where loss of TPO trees is unavoidable to enable development, this will need to be justified through an arboricultural assessment, and appropriate replacement planting will be required. The Plan's policies on trees will ensure TPO trees are protected and that development does not result in unacceptable loss of trees that contribute to amenity and character.</i>
Places & Growth Sites	General Opinion / View	Opposition to the location of proposed development close to the M4 as this in direct conflict with paragraph 185 & 186 of the NPPF and policy SD11 of the draft Plan	<i>The Council will ensure that sites located near major roads are assessed for noise, air quality, and other environmental impacts in accordance with NPPF paragraphs 185 and 186. Site allocation policies will require appropriate mitigation measures including acoustic barriers, building design and layout, and buffer zones to protect future occupiers from unacceptable noise and air quality impacts. Development will only be allocated where it can be demonstrated that acceptable living conditions can be achieved.</i>
Places & Growth Sites	General Opinion / View	Query about how the proposed site will benefit the community	<i>Each site allocation policy will set out the benefits that development is expected to deliver, including affordable housing, employment opportunities, infrastructure improvements, green infrastructure, and community facilities. The Council will work with developers to ensure allocated sites deliver tangible benefits for existing and new communities through well-designed, sustainable development that meets identified local needs.</i>
Places & Growth Sites	General Opinion / View	Support for development on site proposed as it will help address housing need	<i>The Council welcomes support for allocation of specific sites to contribute towards meeting the Borough's housing need.</i>

Theme	Sub-Theme / Issue	Summary	Response
Places & Growth Sites	Other omission sites	Site is suitable and available for allocation in the plan to meet the needs of the Borough.	<i>The Council has assessed all submitted sites through the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Site selection is based on suitability, availability, achievability, sustainability performance, and conformity with the spatial strategy. The Council will review all representations promoting omission sites and consider whether any should be allocated in the Regulation 19 Plan, informed by updated evidence and the need to meet the housing requirement.</i>
Places & Growth Sites	Potters Bar - Omission Site	Site is suitable and available for allocation in the plan but has been omitted from the strategy for the Potters Bar area.	<i>The Council has assessed all submitted sites through the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Site selection is based on suitability, availability, achievability, sustainability performance, and conformity with the spatial strategy. The Council will review all representations promoting omission sites and consider whether any should be allocated in the Regulation 19 Plan, informed by updated evidence and the need to meet the housing requirement.</i>
Places & Growth Sites	Radlett - Omission Site	Site is suitable and available for allocation in the plan but has been omitted from the strategy for the Radlett area.	<i>The Council has assessed all submitted sites through the Housing and Employment Land Availability Assessment and Sustainability Appraisal. Site selection is based on suitability, availability, achievability, sustainability performance, and conformity with the spatial strategy. The Council will review all representations promoting omission sites and consider whether any should be allocated in the Regulation 19 Plan, informed by updated evidence and the need to meet the housing requirement.</i>
Places & Growth Sites	General opinion / view	Support for removal of omission site	<i>The Council welcomes this support for the outcomes of the site allocation process and omission of specific sites. The Draft Local Plan candidate sites have been selected following comprehensive assessment of all sites promoted through the Housing and Economic Land Availability Assessment (HELAA) process, with sites excluded from allocation where they are found to be unavailable, unsuitable due to policy constraints or technical issues that cannot reasonably be mitigated, or unachievable in terms of viability or deliverability within the plan period, with the site selection methodology, assessment findings, and justification for inclusion or exclusion of sites documented transparently in the HELAA report, site selection background paper, and sustainability appraisal, and informed by consultation responses, technical evidence, and engagement with landowners, statutory consultees, infrastructure providers, and the local community.</i>

Theme	Sub-Theme / Issue	Summary	Response
Places & Growth Sites	General opinion / view	Support for site proposed due to evidence provided demonstrating that technical matters can be satisfactorily addressed	<i>The Council recognises that site allocations must be based on robust evidence that sites are available, suitable, and achievable, with technical constraints including access, highways, drainage, flood risk, contamination, ecology, landscape, heritage, utilities, and other infrastructure requirements capable of being satisfactorily addressed through appropriate design, mitigation measures, and planning conditions or obligations. The site allocation process has been informed by the Housing and Economic Land Availability Assessment (HELAA), technical studies including transport assessments, flood risk assessment, ecology surveys, landscape and visual impact assessment, heritage impact assessment, and infrastructure capacity analysis, site-specific evidence submitted by site promoters, and consultation with statutory consultees including highways authorities, environmental bodies, heritage organisations, and infrastructure providers to assess the suitability and deliverability of proposed allocations. The Regulation 19 Publication version of the Local Plan includes only those site allocations that are demonstrably deliverable, supported by robust evidence, and capable of coming forward for development in accordance with the Plan's spatial strategy and sustainability objectives.</i>
Places & Growth Sites	General opinion / view	Support for development of site due to it aligning with the spatial strategy	<i>The Council recognises that site allocations should be consistent with and support the delivery of the Local Plan's spatial strategy, which sets out the overall pattern, scale, and distribution of development across the borough, directs growth to the most sustainable locations, and balances the need to meet objectively assessed development needs with the protection of environmental assets, Green Belt, heritage, and settlement character. The Council will ensure that the Regulation 19 Publication version of the Local Plan includes a coherent and integrated package of site allocations that collectively deliver the spatial strategy, meet development needs, and support the creation of sustainable, inclusive, and well-connected communities across Hertsmere in accordance with the Plan's vision and national policy requirements.</i>
Places & Growth Sites	General opinion / view	Support for development of site due to the benefits it would bring	<i>The Draft Local Plan seeks to allocate sites that deliver a range of benefits including contributing to housing supply and choice, providing affordable housing, supporting economic growth, delivering necessary infrastructure, protecting and enhancing environmental assets, and creating high-quality, sustainable, and inclusive places. The Council will ensure that the Regulation 19 Publication version of the Local Plan allocates sites that deliver the greatest overall benefits and contribute positively to the delivery of sustainable development, the Plan's vision and objectives, and the well-being of current and future communities across Hertsmere.</i>

Theme	Sub-Theme / Issue	Summary	Response
Places & Growth Sites	Delivery	Concern that delivery speed will impact on quality of development and conflict with the aims of the plan	The Council recognises that whilst timely delivery of housing and infrastructure is essential to meet identified needs and maintain housing land supply, this must not be at the expense of design quality, place-making, environmental protection, heritage conservation and infrastructure provision. The Draft Local Plan includes robust proposed policies on design quality and place-making (Policy HBF1), infrastructure provision and phasing (Policy SCI1), sustainable construction (SD1 and supporting policies) and site-specific allocation policies setting out design principles, infrastructure requirements, and delivery expectations to ensure that development is delivered to a high standard and in a manner consistent with the Plan's vision and objectives. The Council will ensure that development management processes including pre-application engagement, design review, planning conditions, Section 106 obligations, and monitoring mechanisms maintain quality standards throughout the development process, and will ensure that the Regulation 19 Publication version of the Local Plan balances the imperative to deliver housing and infrastructure in a timely manner with the equally important objective of securing high-quality, sustainable, and well-designed development that enhances the character, environment, and quality of life across Hertsmere.
Places & Growth Sites	General opinion / view	Suggestion that proposed development will support relevant policy/guidance	The Council welcomes this support for development which aligns with relevant policy/guidance. The Draft Local Plan has been prepared in accordance with the statutory development plan preparation process, national policy and guidance, the legal duty to cooperate, sustainability appraisal and strategic environmental assessment requirements, and consultation and engagement obligations, with policies and site allocations designed to deliver sustainable development that meets the economic, social, and environmental objectives set out in national policy whilst reflecting local character, needs, priorities, and constraints.
Places & Growth Sites	Delivery	Suggestion that mitigation measures proposed for a specific development are appropriate and viable	The Draft Local Plan includes proposed policies requiring development to assess and mitigate impacts through appropriate design, layout, landscaping, infrastructure provision, environmental protection measures, and planning obligations (Policy SCI1), with site allocation policies setting out specific mitigation requirements tailored to the characteristics, constraints, and impacts of each site, including highways improvements, drainage infrastructure, biodiversity enhancements, landscape buffers, heritage protection measures, and community facility provision. The Council has reviewed technical evidence including transport assessments, flood risk assessments, ecology surveys, heritage impact assessments, viability appraisals, and other supporting studies to verify the appropriateness, effectiveness, and deliverability of proposed mitigation and consulted with statutory consultees and technical specialists to confirm that mitigation measures adequately address identified impacts and comply with relevant standards and regulations. The Regulation 19 Publication version of the Local Plan will include robust site allocation policies that clearly specify necessary mitigation measures and secure their delivery through planning conditions and obligations to ensure that allocated sites can be developed in a sustainable and acceptable manner that protects the environment, infrastructure, amenity, and character of Hertsmere.

Theme	Sub-Theme / Issue	Summary	Response
Places & Growth Sites	General opinion / view	Support for development in areas which are more sustainable and don't require reliance on private vehicles	<i>The Draft Local Plan spatial strategy prioritises development in the major settlements of Borehamwood, Bushey, Potters Bar, and Radlett, which benefit from mainline railway stations providing frequent services to London and other destinations, a range of local services, facilities, employment opportunities, schools, healthcare, and shops accessible by walking and cycling, established bus networks, and existing infrastructure to support sustainable travel patterns, with site allocations focused on accessible locations within or adjacent to these settlements to minimise car dependency and maximise opportunities for sustainable transport use. The Council will ensure that site allocation policies require development to prioritise walking, cycling, and public transport provision, provide high-quality pedestrian and cycle infrastructure including safe routes to schools, stations, employment areas, and local centres, support public transport improvements and integration, provide appropriate levels of car parking that reflect accessibility and do not encourage unnecessary car use, incorporate electric vehicle charging infrastructure, and deliver transport assessments, travel plans, and necessary highway and sustainable transport improvements, and will ensure that the Regulation 19 Publication version of the Local Plan delivers a sustainable pattern of development that reduces reliance on private vehicles, supports modal shift to walking, cycling, and public transport, and contributes to reducing carbon emissions, improving air quality, promoting healthy lifestyles, and creating inclusive, connected, and sustainable communities across Hertsmere.</i>
Places & Growth Sites	General opinion / view	Concern number of homes provided would not provide levels of funding required to mitigate impacts on local infrastructure	<i>The Council recognises that development must be supported by adequate infrastructure. The Draft Local Plan Infrastructure Delivery Plan identifies the infrastructure requirements arising from planned development over the plan period, assesses existing capacity and future needs for education, healthcare, transport, utilities, emergency services, community facilities, green infrastructure, and other infrastructure and sets out anticipated costs, funding sources, delivery mechanisms, phasing, and responsibilities. The IDP has been prepared in consultation with infrastructure providers including Hertfordshire County Council as education, highways, and minerals and waste planning authority, the NHS Integrated Care Board, utility companies, emergency services, and other statutory and non-statutory consultees to ensure that infrastructure planning is robust, coordinated, and deliverable.</i>
Places & Growth Sites	General opinion / view	Recommendation for the Council to undertake engagement with site promoters on site-specific allocation policies	The council has been engaging with developers, agents, and site promoters throughout the site allocation process and will continue this engagement as we move towards Regulation 19 publication and examination.
Places & Growth Sites	Social Infrastructure	Concern about lack of provision for outdoor and amenity space in new development	The Local Plan will include strategic policies requiring all new residential development to provide or contribute towards open space, play facilities, sports provision, and recreation facilities to meet the needs of future occupants based on local standards informed by up-to-date evidence, including the Open Space Assessment, Green and Blue Infrastructure Study and Outdoors Sports and Playing Pitch Study.

Theme	Sub-Theme / Issue	Summary	Response
Transport	Active Travel (incl. walking, cycling)	Concern over the impacts of development on PRoW network	<i>The Council recognises the importance of protecting and enhancing the Public Rights of Way (PRoW) network. The Plan will require development proposals to retain existing PRoW and, where possible, enhance connectivity to support active travel. Site allocation policies will include requirements to integrate PRoW into green infrastructure networks and improve accessibility where appropriate. This aligns with NPPF paragraph 104 on promoting sustainable transport and paragraph 100 on protecting and enhancing PRoW and access to high-quality open spaces.</i>
Transport	Active Travel (incl. walking, cycling)	Requirement that existing Public Rights of Way (PRoW) connected to and in the vicinity of sites will need to be retained and enhanced to make active travel connections and have regard to the HCC Rights of Way Improvement Plan (ROWIP). Should site specific policy requirements in relation to PRoW be deemed not to be deliverable, the Highway Authority would object to the inclusion of the site(s) in future versions of the plan. Further recommendation that a separate Plan policy on PRoW and their integration into other relevant policies should be included.	<i>The Regulation 19 Local Plan recognises Public Rights of Way through its green infrastructure, movement and place-based policies. Policy GI1 seeks to strengthen connections between neighbourhoods, open spaces, rights of way, water bodies and the wider countryside, with site-specific requirements included where relevant.</i>
Transport	Buses	Need for investment from development to improved public transport to support the number of homes proposed in the area/on the site.	<i>The Council recognises that proposed housing growth will generate increased demand for public transport. The Transport Study and Infrastructure Delivery Plan identify public transport capacity requirements and mitigation measures. Site allocation policies will require contributions toward bus service improvements, infrastructure enhancements, and where appropriate, new or diverted routes to serve major developments, secured through Section 106 obligations in accordance with national policy.</i>
Transport	General Opinion / View	General opposition to / concern about development due to perceived difficulty in supporting growth with transport infrastructure in practice	<i>The Council is undertaking transport modelling through the Transport Study to assess the impact of proposed growth on the transport network. The Infrastructure Delivery Plan identifies necessary transport infrastructure improvements to support development. Site allocation policies will include transport mitigation requirements, and developer contributions will be secured to deliver necessary improvements. Development will only be allocated where it can be demonstrated that transport impacts can be adequately mitigated.</i>
Transport	General Opinion / View	Objection to / concern about proposed "car-lite" approach as not yet convincingly justified or realistically deliverable, particularly in rural and semi-rural areas	<i>The Council's approach to car-lite development is informed by evidence of site accessibility, public transport provision, and active travel connectivity. The Plan recognises that car-lite approaches are most appropriate in highly accessible urban locations with good public transport links. In rural and semi-rural areas, the Plan will apply parking standards that reflect accessibility levels and local circumstances, in accordance with NPPF paragraph 108, which requires development to provide appropriate opportunities for sustainable transport while recognising that opportunities will vary between urban and rural areas.</i>

Theme	Sub-Theme / Issue	Summary	Response
Transport	General Opinion / View	Support for reduced car-lite development in principle as long as it is supported by improved active travel and public transport links	<i>The Council welcomes support for car-lite development where supported by sustainable transport infrastructure. The Plan will require major developments proposing reduced parking provision to demonstrate that they are supported by high-quality public transport, walking and cycling infrastructure. This aligns with NPPF paragraph 109 on optimising the density of development and paragraph 114 on prioritising pedestrian and cycle movements.</i>
Transport	General Opinion / View	National Highways support Policy TR1 and TR4 and request that they are consulted as follows: With regards to infrastructure network improvements, early on any proposed improvement works to the SRN as part of the emerging Local Plan policies; on any planning applications for major developments that are likely to generate significant delivery or construction traffic as these vehicles, are more likely to use the SRN as part of their route; and for any developments located close to the M1 so the full impact of development on the safety or operation of the SRN can be assessed.	<i>The Council welcomes National Highways' support for transport policies and will ensure appropriate consultation on matters affecting the Strategic Road Network (SRN). The Plan will include a requirement for developers to consult National Highways on applications likely to impact the SRN, including major developments generating significant construction or delivery traffic, and developments near the M1, M25 and A1 / A1(M). Site allocation policies will reflect National Highways' consultation requirements.</i>
Transport	General Opinion / View	National Highways ask the Council to present robust evidence on cumulative impacts on the SRN as set out in DfT Circular 01/2022 (Para. 33) and seek further discussion.	<i>The Council's Transport Study assesses cumulative impacts of proposed development on the Strategic Road Network in accordance with DfT Circular 01/2022. The Council will continue to engage with National Highways to ensure robust evidence is provided on strategic transport impacts and to identify any necessary mitigation measures through the plan-making process.</i>
Transport	General Opinion / View	Support for the focus on sustainable travel networks, including the Hertsmere LCWIP, in line with NPPF focus on sustainable development	<i>The Council welcomes support for sustainable travel policies. The Local Cycling and Walking Infrastructure Plan (LCWIP) will inform the Plan's approach to active travel infrastructure, identifying priority routes and interventions. Development will be required to contribute to LCWIP delivery where appropriate, supporting the NPPF's objectives for sustainable development and reducing carbon emissions.</i>
Transport	General Opinion / View	Support for transport policies within the draft Plan.	<i>The Council welcomes support for the Plan's transport policies, which seek to deliver sustainable, accessible development while managing transport impacts effectively.</i>
Transport	General Opinion / View	General concern about cross-boundary transport pressures arising from development outside Hertsmere.	<i>The Council recognises that development in neighbouring authorities can generate cross-boundary transport impacts. The Council's Cooperation efforts (following the abolition of the Duty to Cooperate process) addresses strategic transport matters with adjoining authorities. The Transport Study considers cross-boundary movements, and the Council will continue to work with neighbouring authorities and Hertfordshire County Council to manage cumulative transport impacts on the highway network.</i>

Theme	Sub-Theme / Issue	Summary	Response
Transport	General Opinion / View	Concern over the trip rates being generated from Bowmans Cross and emphasis of importance of exploring a comprehensive transport scheme that prioritises trip internalisation and sustainable transport links to Potters Bar, London Colney, St Albans and Hatfield.	<i>The Council recognises the significant transport implications of development at Bowmans Cross. Detailed transport assessment work will inform the scale, design and phasing of development. The allocation policy will require a comprehensive transport strategy prioritising trip internalisation through mixed-use development, sustainable transport links to Potters Bar, London Colney, St Albans and Hatfield, and measures to minimise reliance on private car travel, all to be agreed with Hertfordshire County Council as Highway Authority.</i>
Transport	General Opinion / View	Recommendation that Policy TR7 recognises the recreational and economic value of aviation activities, in particular uses that support the operational requirements of the aerodrome. Uses that facilitate the continued use of the aerodrome should be supported and protected.	<i>The Council recognises the economic and recreational value of aviation activities at aerodromes in the Borough. Policy TR7 will be reviewed to ensure it supports uses that facilitate the continued operational requirements of aerodromes, while balancing this with residential amenity, environmental protection and safety considerations, in line with national policy.</i>
Transport	General Opinion / View	Requirement for the Borough Council and County Council to collaborate to address key transport issues relating to the Plan, including devising a borough wide transport strategy and identifying measures to mitigate highway impacts from the development at Bowmans Cross	<i>The Council recognises that effective partnership working between the Borough Council as local planning authority and the County Council as local highway authority is essential to ensure that transport infrastructure and highways capacity can accommodate planned growth and that necessary improvements are identified and delivered, in accordance with the duty to cooperate. The Draft Local Plan has been informed by ongoing engagement with Hertfordshire County Council and transport evidence including the Local Plan Transport Study, which assesses highway capacity, identifies infrastructure requirements, and informs proposed transport policies including Policy TR1 (Sustainable Transport and Movement) and Policy DM2 (Infrastructure Funding and Planning Obligations). The Council is committed to continuing close collaboration with the County Council to develop a comprehensive transport strategy that supports sustainable travel, addresses highways impacts from strategic allocations including Bowmans Cross, secures necessary infrastructure improvements through developer contributions and public investment, and ensures that transport networks can safely and efficiently accommodate planned growth across Hertsmere.</i>
Transport	General opinion / view	Clarity needed on potential policy related to the Elstree Aerodrome and implications for residential developments within the Bushey area	<i>As set out in the draft Local Plan, Policy TR7 will be a strategic policy that supports the continued operation of the Aerodrome and will set out any specific requirements for new residential developments in the vicinity of the aerodrome.</i>
Transport	Highways	Recommendation for Council to publish a targeted shortlist of funded transport and junction fixes for Elstree and Borehamwood bottlenecks prior to finalising the plan.	<i>The Infrastructure Delivery Plan identifies transport infrastructure priorities, including junction improvements to address capacity constraints in Elstree and Borehamwood. The Council is working with Hertfordshire County Council as Highway Authority to identify deliverable interventions. The Regulation 19 Plan will be supported by an updated Infrastructure Delivery Plan setting out funded and developer-funded transport improvements required to support growth.</i>

Theme	Sub-Theme / Issue	Summary	Response
Transport	Highways	Concerns over the limited existing access points into the Bowmans Cross site and its relationship with the strategic road network, requiring significant intervention to provide safe, efficient and sustainable access both within the site and to surrounding areas.	<i>The Council acknowledges that Bowmans Cross presents significant access challenges given its current use and relationship with the strategic road network. Comprehensive masterplanning and transport assessment will be required to demonstrate that safe, efficient and sustainable access can be provided both within the site and to the surrounding area. The allocation policy will set out detailed access requirements to be agreed with Hertfordshire County Council and National Highways.</i>
Transport	Highways	Access for vehicles will be impacted by exacerbated flood risk.	<i>The Council will ensure that vehicular access arrangements for developments take account of flood risk. Site allocation policies will require flood risk assessments to demonstrate that access routes remain safe and operational during flood events for the lifetime of the development, in accordance with NPPF Chapter 14 on meeting the challenge of climate change, flooding and coastal change.</i>
Transport	Highways	Concern that the proposals can only provide one vehicular access which is insufficient for the size and scale of development and will cause congestion issues	<i>The Council will require site-specific transport assessments to demonstrate that proposed access arrangements are appropriate for the scale and nature of development. Where a single vehicular access is proposed for major development, evidence will need to demonstrate that this can safely accommodate anticipated traffic flows and emergency vehicle access without causing unacceptable congestion, to the satisfaction of Hertfordshire County Council as Highway Authority.</i>
Transport	Highways	Requirement of technical testing of the impacts to the highway network to understand and mitigate the resulting impact from development. Until such a time that this information is available, HCC reserve their position on the proposed plan.	<i>The Council acknowledges Hertfordshire County Council's requirement for detailed technical testing of highway impacts. Further transport modelling and junction capacity assessments will be undertaken to inform the Regulation 19 Plan. Site allocation policies will include transport mitigation requirements based on this evidence. Until this work is completed, HCC's position on the Plan is reserved, and the Council will continue to work closely with the Highway Authority to address outstanding technical matters.</i>
Transport	Highways	Support for urban extensions being consulted upon, as they largely align with the prioritisation of sustainable development and the HCC Local Transport Plan, however detailed work will be required to evidence the suitability of many of the allocations.	<i>The Council welcomes Hertfordshire County Council's general support for the proposed urban extensions, which align with the HCC Local Transport Plan's priorities for sustainable development. Detailed transport assessments will be required at the planning application stage to demonstrate the suitability of individual allocations and identify necessary mitigation measures.</i>
Transport	Highways	Caution that HCC commentary provided on individual sites is specific to each site and does not suggest that HCC as Highway Authority accepts any specific development scenario (or selection of sites) in terms of additional cumulative impact on the highway network.	<i>The Council notes Hertfordshire County Council's position that site-specific comments do not constitute acceptance of the cumulative impact of the proposed development scenario on the highway network. The Council will continue to work with HCC to undertake cumulative transport impact assessments and identify necessary strategic highway improvements through the Infrastructure Delivery Plan.</i>

Theme	Sub-Theme / Issue	Summary	Response
Transport	Highways	General concern about lack of commitment to delivering new highways infrastructure to support growth.	<i>The Council is committed to delivering necessary transport infrastructure to support growth. The Infrastructure Delivery Plan identifies highway improvements required to mitigate development impacts. These will be funded through a combination of developer contributions, secured through Section 106 agreements, and where appropriate, external funding sources. The Plan will include mechanisms to ensure infrastructure is delivered in tandem with development.</i>
Transport	Highways	Concern that safe vehicular access for emergency services has not been demonstrated.	<i>The Council will require site allocation policies to address emergency vehicle access. Development proposals will need to demonstrate compliance with Building Regulations Approved Document B on fire safety and meet the requirements of emergency services. Access arrangements will be subject to consultation with the emergency services and approval by the Highway Authority.</i>
Transport	Highways	Concern that highways are too narrow to safely support increased traffic arising from growth.	<i>The Council will ensure that transport assessments identify capacity constraints on the existing highway network. Where development would result in unacceptable impacts on highway safety or severe cumulative impacts on the road network, mitigation measures including highway widening, junction improvements or traffic management will be required, in accordance with NPPF paragraph 115. Development will only be allocated where it can be demonstrated that impacts can be satisfactorily mitigated.</i>
Transport	Parking	Concerns around new development impacting on parking availability for existing residents.	<i>The Council recognises concerns about parking displacement onto residential streets. The Plan will include parking standards that balance the need to promote sustainable transport with ensuring adequate parking provision to protect residential amenity. Major developments will be required to demonstrate through parking assessments that they will not result in unacceptable on-street parking pressure in surrounding residential areas.</i>
Transport	Buses	Need for improved public transport.	<i>Policy TR1 supports improvements to the public transport network, including bus priority and bus-stop infrastructure, while site-specific transport requirements are identified where necessary to support allocated development.</i>
Transport	Parking	Objection to / concern about proposed reduction of parking and query on how this could be implemented and what alternatives would be in place to ensure town-centre vitality and commuter access	<i>The Council's approach to town centre parking will balance the need to optimise land use for regeneration with maintaining adequate parking to support town centre vitality and commuter access. Any reduction in public parking will be subject to parking impact assessments and consultation with stakeholders. Alternative parking provision or improved sustainable transport access will be required where public parking is reduced, in accordance with NPPF paragraph 109.</i>

Theme	Sub-Theme / Issue	Summary	Response
Transport	Parking	General concern that reducing car parking will displace demand on to residential streets, exacerbating congestion and undermining access to rail services	<i>The Council recognises that reduced parking provision at town centres and rail stations could displace parking onto residential streets. The Plan will require parking assessments to demonstrate that proposals will not result in unacceptable displacement. Amendments to existing Controlled Parking Zones or additional Zones may be considered where appropriate to manage parking demand alongside improved sustainable transport links to stations.</i>
Transport	Parking	Recommendation to protect car parking provision at railway stations.	<i>The Council recognises the importance of station car parking in facilitating rail use and reducing highway congestion. The Plan will seek to protect existing station car parks unless it can be demonstrated that alternative sustainable transport access is provided, or replacement parking is deliverable. Station car park development proposals will need to be supported by robust parking demand assessments and consultation with the train operating companies and Network Rail/Great British Railways.</i>
Transport	Parking	Recommendation to acknowledge that High Barnet car park will be developed so there will be no parking provision and this is likely to be the case for Edgware and other stations including Burnt Oak and Mill Hill, therefore, provision will need to be made for sustainable options for those wanting to travel to stations in Barnet.	<i>The Council notes that station car parks in the London Borough of Barnet, including High Barnet, Edgware, Burnt Oak and Mill Hill, may be developed, reducing parking availability for Hertsmere residents. The Plan will work with Transport for London (London Underground), the London Borough of Barnet and train operating companies to ensure sustainable transport alternatives are provided for residents wishing to access these stations, including improved bus links, cycle parking and pedestrian routes.</i>
Transport	Parking	General concern about loss of car parking.	<i>The Council will include policies to manage the loss of public car parking. Loss of car parking will only be supported where it can be demonstrated that there is sufficient alternative provision, the parking is genuinely surplus to requirements, or the benefits of redevelopment outweigh the loss, and adequate sustainable transport alternatives are available. This approach is consistent with NPPF requirements to support town centre vitality.</i>
Transport	Rail	Concern that growth will necessitate improved rail connections in Hertsmere.	<i>The Council recognises that growth will increase demand for rail services. The Plan promotes development in accessible locations well-served by rail. The Council will work with Network Rail and train operating companies to advocate for improved station and train service capacity including increased frequencies and faster services to London. Developer contributions will be sought toward station improvements and enhanced connectivity where development generates significant rail demand.</i>
Transport	Rail	General concern about existing pressure on rail services and lack of commitment from operators to upgrade local stations in line with growth.	<i>The Council acknowledges existing pressure on rail services and the need for capacity and accessibility improvements. While the Council cannot require rail operators to upgrade services or stations, it will work proactively with Network Rail and operators to identify infrastructure needs arising from planned growth. The Infrastructure Delivery Plan will set out rail infrastructure requirements, and the Council will advocate for rail investment through engagement with transport authorities and government.</i>

Theme	Sub-Theme / Issue	Summary	Response
Transport	Rail	Concern that access to the railway tunnel near the site's boundary is pedestrian only and subject to Network Rail restrictions.	<i>The Council notes Network Rail's operational and safety requirements for structures on or adjacent to the railway. Site allocation policies for sites near railway infrastructure will require early engagement with Network Rail to address access, safety, and operational matters. Where pedestrian access to railway infrastructure is restricted, alternative access routes will be required, subject to Network Rail approval.</i>
Transport	Traffic	General concern about growth in Hertsmere causing increased traffic	<i>The Council recognises that growth will generate additional traffic. The emerging Transport Study models traffic impacts of proposed development and identifies necessary mitigation measures. The Plan will include policies requiring development to minimise traffic generation through sustainable design, provide appropriate sustainable transport infrastructure, and contribute to highway improvements where necessary, in accordance with NPPF paragraph 114.</i>
Transport	Traffic	Site Specific concern about growth in Hertsmere causing increased traffic	<i>The Council will ensure that site-specific transport assessments identify local traffic impacts and necessary mitigation measures. Site allocation policies will include requirements for traffic management, highway improvements, and sustainable transport provision to address site-specific concerns, to be agreed with Hertfordshire County Council as Highway Authority.</i>
Transport	Traffic	General concern about existing traffic in Hertsmere.	<i>The Council acknowledges existing traffic congestion in parts of the Borough. While the Plan alone cannot solve pre-existing traffic issues, it seeks to avoid exacerbating them through sustainable development patterns, transport impact mitigation, and infrastructure investment. The Infrastructure Delivery Plan identifies transport improvements that will benefit both new and existing residents.</i>
Transport	Highways	Support for site due to no significant impacts on highways	<i>The site allocation process has been informed by transport modelling, highways capacity assessments, junction modelling, site-specific transport assessments submitted by site promoters, and consultation with Hertfordshire County Council as the local highways authority to assess the highways impacts of proposed allocations, identify necessary mitigation measures, and ensure that allocated sites can be satisfactorily accessed and will not result in unacceptable impacts on highway safety or severe residual cumulative impacts on the road network. The Council will ensure that site allocation policies include appropriate requirements for access arrangements, transport assessments, travel plans, highways improvements, and sustainable transport provision, and will ensure that the Regulation 19 Publication version of the Local Plan includes only those site allocations that can be delivered without unacceptable highways impacts and that support the promotion of sustainable transport in accordance with national policy.</i>

Theme	Sub-Theme / Issue	Summary	Response
Transport	Active Travel (incl. walking, cycling)	Proposed allocation is in a sustainable location with good accessibility	<i>The Council recognises that site allocations should be directed to the most sustainable locations with good access to employment, services, facilities, and public transport, thereby reducing the need to travel, promoting sustainable transport modes including walking, cycling, and public transport, supporting healthy and inclusive communities, and minimising environmental impacts. The Draft Local Plan spatial strategy prioritises development in the borough's major settlements of Borehamwood, Bushey, Potters Bar, and Radlett due to their range of services, facilities, employment opportunities, and public transport connectivity, particularly rail services, and the site selection process has assessed the sustainability and accessibility of potential allocations considering proximity to services and facilities, public transport accessibility levels, opportunities for walking and cycling, employment accessibility, and integration with existing communities. The Council will ensure that the Regulation 19 Publication version of the Local Plan allocates sites in the most sustainable and accessible locations in accordance with the spatial strategy, settlement hierarchy, and national policy requirements for promoting sustainable development and transport.</i>
Transport	Parking	Recommendation that Policy TR3 has an appropriate level of flexibility and considers varying parking requirements in different areas of the Borough to reflect differing accessibility levels.	<i>Policy TR3 will set maximum parking standards for the Borough, allowing flexibility for proposed developments to provide less provision where appropriate. Proposals that optimise the potential for future car-lite development and demonstrably provide the flexibility and enable technological advancements in travel will be supported.</i>
Transport	Active Travel (incl. walking, cycling)	General concern that growth in Hertsmere will decrease walkability	The emerging Spatial Strategy is intended The Local Plan will include strategic policies on sustainable transport and movement requiring development to prioritise walking, cycling, and public transport, to be located and designed to minimise the need to travel and maximise opportunities for sustainable travel and to deliver high-quality, safe, direct, attractive, and accessible pedestrian and cycle routes within developments and connecting to surrounding areas, as well as other infrastructure to support active travel. This will help ensure that growth enhances rather than diminishes walkability and that new and existing residents can access daily needs, opportunities, and green spaces safely, conveniently, and enjoyably on foot or by cycle
Transport	Rail	Transport Assessments included within planning applications for site allocations should include an assessment of the impacts on the railway network from an increase in housing, to ensure that Network Rail can determine changes in passenger numbers and types and assess the appropriateness of existing facilities and identify any improvements that may be required.	<i>The Council will encourage applicants proposing development on allocated sites or other major housing sites to engage with Network Rail at an early stage and request assessment of rail passenger impacts within transport assessments where appropriate.</i>
Transport	Rail	Recommendation that the Radlett Rail Freight Interchange terminal is referenced as an example of sustainable freight policy.	<i>The representation is noted. Policy TR4 supports sustainable freight movement by rail, water and road and provides the policy framework for freight-related development and servicing.</i>

Theme	Sub-Theme / Issue	Summary	Response
Transport	Active Travel (incl. walking, cycling)	Proposed allocation is not in a sustainable location and beyond walking distance from services and facilities	<i>The Council's spatial strategy prioritises development in accessible locations well-served by public transport, shops and services, where possible. Where sites are proposed in less accessible locations, allocation policies will require evidence that sustainable transport connectivity can be provided, or that the site delivers specific benefits such as affordable housing or employment that justify its allocation. Site selection is informed by sustainability appraisal, accessibility analysis and the settlement hierarchy.</i>
Transport	Active Travel (incl. walking, cycling)	Site is in a more sustainable location than other proposed candidate sites	<i>The Council's site selection process assesses all reasonable alternatives against sustainability criteria including accessibility, environmental constraints, deliverability and infrastructure capacity. The Sustainability Appraisal compares sites to inform allocation decisions. The Council will take into account comparative sustainability in finalising site allocations for the Regulation 19 Plan.</i>
Transport	Active Travel (incl. walking, cycling)	Concern over the impacts of development on the safety of pedestrians and cyclists due to narrow or missing footpaths/pavements/cycle lanes	<i>The Council will require development to provide safe pedestrian and cycle access. Site allocation policies will include requirements for pedestrian and cycle infrastructure improvements, including new or widened footways, cycle lanes, and crossing facilities where necessary. Development will be required to deliver safe routes to schools, shops, public transport and employment in accordance with NPPF paragraph 114 on prioritising pedestrian and cycle movements and creating safe and accessible places.</i>
Transport	Active Travel (incl. walking, cycling)	The needs of pedestrians and cyclists should be prioritised.	<i>The Council recognises that prioritising walking and cycling is essential to delivering sustainable development, reducing car dependency, improving air quality, supporting climate change mitigation, promoting health and well-being, and creating attractive, liveable communities. Proposed Policy TR1 (Sustainable Transport and Movement) requires development to prioritise walking, cycling, and public transport, provide safe, direct, and attractive pedestrian and cycle routes, ensure connectivity to existing networks and key destinations, and incorporate measures to encourage active travel. Proposed Policy HQD1 (Delivering High-Quality Design in Hertsmere) requires development to create high-quality, permeable, and legible layouts that prioritise pedestrians and cyclists, and site-specific policies for strategic allocations identify requirements for walking and cycling infrastructure. The Council is committed to ensuring that development prioritises the needs of pedestrians and cyclists through comprehensive walking and cycling networks, safe and accessible routes, high-quality public realm, traffic calming measures, secure cycle parking, and layouts that make walking and cycling the natural choice for local journeys, supporting sustainable, healthy, and active communities across Hertsmere.</i>

Theme	Sub-Theme / Issue	Summary	Response
Transport	Active Travel (incl. walking, cycling)	Concern that transport policies emphasise walking and cycling but do not make equivalent reference to equestrian activity as a form of active travel	<i>The Council recognises that equestrian activity contributes to rural character, provides recreational opportunities, supports rural economies, and forms part of the wider rights of way network including bridleways that accommodate pedestrians, cyclists, and horse riders. Proposed Policy GI1 (Hertsmere's Green and Blue Infrastructure) and proposed Policy GI2 (Hertsmere's Watercourses and Blue Infrastructure) require development to protect and enhance green infrastructure networks including public rights of way, bridleways, and multi-user routes that support walking, cycling, and equestrian access, and proposed Policy TR1 (Sustainable Transport and Movement) prioritises sustainable and active travel modes. The Council will consider whether explicit reference to equestrian access and bridleways within transport and green infrastructure policies would be beneficial.</i>
Transport	Traffic	Need for more new highways capacity to accommodate new development	<i>The Council's emerging Transport Study will identify where highway capacity improvements are required to accommodate proposed growth. The Infrastructure Delivery Plan sets out necessary highway schemes, to be funded through a combination of developer contributions and external funding sources. Allocation policies will include requirements for site-specific highway mitigation in accordance with NPPF paragraph 114.</i>
Transport	Traffic	General concern that transport proposals in the Local Plan will not solve existing traffic problems.	<i>While the Plan cannot solve all existing transport issues, it seeks to avoid exacerbating them through sustainable development patterns, transport mitigation, and infrastructure investment. The Infrastructure Delivery Plan identifies improvements that will benefit both new and existing residents. The Council will continue to work with Hertfordshire County Council to address transport priorities.</i>
Transport	Traffic	Concern that lack of infrastructure in this location increases reliance on highway network and reinforces car dependency.	<i>The Council's spatial strategy prioritises development in accessible locations well-served by sustainable transport. Where sites in less accessible locations are proposed, allocation policies will require measures to improve sustainable transport connectivity and reduce car dependency, including enhanced bus services, walking and cycling infrastructure, and travel planning measures.</i>
Transport	Traffic	General concern that a lack of public transport options increase traffic congestion at peak hours.	<i>The Council recognises that inadequate public transport increases car dependency and congestion. The Plan requires major developments to contribute to public transport improvements. The Infrastructure Delivery Plan identifies priority bus service enhancements and new routes to support growth, to be secured through Section 106 obligations.</i>
Transport	Traffic	Concern that development in Borehamwood and Elstree is likely to have impacts on junctions that already have capacity constraints in the LB of Barnet such as Canons Corner (A5/A410), Apex Corner (A1/A41/A5109) and the Stirling Corner (A1/A411) and Rowley Lane A1/A5135) junctions that are likely to cause congestion on Barnet borough roads.	<i>The Council recognises that development in Borehamwood and Elstree can generate cross-boundary traffic impacts on junctions in the London Borough of Barnet. The Transport Study models these impacts, and the Council is working with LB Barnet and Transport for London through the cooperation process to identify necessary mitigation measures. Developer contributions will be sought toward junction improvements where development generates significant impacts.</i>

Theme	Sub-Theme / Issue	Summary	Response
Transport	Traffic	Opposition to any increase in capacity on strategic roads in Barnet, whether the LB Barnet Council is the highways authority or where these are managed by TfL of the Highways Agency.	<i>The Council notes the opposition to strategic road capacity increases in Barnet. The Plan's approach focuses on sustainable transport improvements and demand management rather than major highway capacity expansion. However, where evidence demonstrates that junction improvements are necessary to safely accommodate forecast traffic, these will be identified through cooperation with LB Barnet and TfL.</i>
Vision, Objectives and Spatial Strategy	General Comment	General view / comment on the plan vision/objectives/spatial strategy	<i>The Council welcomes all comments on the Plan's vision, objectives and spatial strategy. All representations will be carefully considered in preparing the Regulation 19 version of the Local Plan.</i>
Vision, Objectives and Spatial Strategy	Objectives	Supports the objectives of the Plan	<i>The Council welcomes support for the Plan's objectives.</i>
Vision, Objectives and Spatial Strategy	Objectives	Opposes the objectives of the Plan	<i>The Council has developed objectives based on evidence of local needs and challenges, community engagement, and national policy requirements. All representations will be considered in finalising the Plan's objectives for the Regulation 19 version.</i>
Vision, Objectives and Spatial Strategy	Objectives	Concern that there is an objective missing from the Plan related to X	<i>The Council will review all representations suggesting additional objectives and will consider whether amendments are needed to ensure the Plan's objectives comprehensively address local priorities and national policy requirements.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Supports the spatial strategy	<i>The Council welcomes support for the spatial strategy.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposes the spatial strategy	<i>The Council's spatial strategy is based on evidence of sustainability, infrastructure capacity, environmental constraints, and housing and employment needs. The strategy seeks to deliver sustainable development patterns in accordance with the NPPF. All representations will be considered in finalising the spatial strategy for the Regulation 19 Plan.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposes the spatial strategy because it proposes too many homes	<i>The Council's housing requirement is based on the government's standard method for calculating housing need, which reflects local housing stock and affordability pressures. National policy requires the Council to plan for this need, and failure to do so would result in the Plan being found unsound at examination.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposes the spatial strategy due to concern over cumulative impact of proposed new housing in combination with recent development already permitted/built	<i>The Council has considered cumulative impacts identified through the Sustainability Appraisal, Transport Study, Infrastructure Delivery Plan and other evidence base documents. The Plan includes policies and infrastructure provision to manage cumulative impacts on the environment, heritage, transport and social infrastructure.</i>

Theme	Sub-Theme / Issue	Summary	Response
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposes the spatial strategy because it is not a sustainable strategy supported by clear evidence	<i>The Council's spatial strategy is supported by a comprehensive evidence base including the Sustainability Appraisal, Transport Study, Infrastructure Delivery Plan, and technical studies on environmental, heritage and infrastructure matters. The strategy directs development to the most sustainable locations and is consistent with the NPPF's requirements for sustainable development.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Preference for building a new settlement to provide housing rather than further developing existing settlements so that new infrastructure can be provided instead of putting pressure on existing infrastructure	<i>The Council has considered the option of a new settlement through the spatial strategy development process. However, evidence demonstrates that urban extensions and development within/adjacent to existing settlements is more deliverable within the plan period, makes better use of existing infrastructure and services, and supports sustainable travel patterns. New settlements typically require very long lead-in times for infrastructure delivery and may not deliver homes within the plan period. Even where a new settlement is being considered, this would not be able to meet all the identified development needs for the Hertsmere area in one location without further development in other locations.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposes the spatial strategy because it does not protect the Green Belt/countryside	<i>The Council's spatial strategy seeks to minimise Green Belt loss through prioritising brownfield land, optimising densities, and only releasing Green Belt where exceptional circumstances can be demonstrated. However, given the extent of Green Belt designation in Hertsmere and the housing need to be met, some Green Belt release is necessary. The Plan follows the approach set out in NPPF Chapter 13 on protecting Green Belt land.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Preference for prioritising delivery on allocated and brownfield sites to prevent incremental and cumulative development / over-intensification	<i>The Council's spatial strategy prioritises brownfield land and allocated sites. Policies will tightly control development outside allocated sites and settlement boundaries to prevent incremental development and over-intensification. The Plan will provide sufficient allocated sites to meet needs, reducing pressure for unplanned development.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposes the spatial strategy because not enough infrastructure is proposed to support/mitigate the impacts of the scale of development proposed	<i>The Infrastructure Delivery Plan identifies all infrastructure required to support proposed development, including transport, education, healthcare, utilities and green infrastructure. Developer contributions will be secured through Section 106 obligations, taking into account the need to also ensure that sites are sufficiently viable to come forward for development.</i>

Theme	Sub-Theme / Issue	Summary	Response
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concerns over coalescence of settlements	<i>The Council recognises that preventing coalescence and maintaining the identity and separation of individual settlements is a fundamental purpose of Green Belt, as set out in paragraph 142(b) of the National Planning Policy Framework (NPPF) 2024. The Draft Local Plan has been informed by the Green Belt Study (Stages 1, 2, and 3), which assesses the contribution of Green Belt parcels to preventing coalescence between settlements including Radlett, Bushey, Bushey Heath, Borehamwood, Elstree, Shenley, Potters Bar, and other settlements within and beyond Hertsmere, and the spatial strategy and site allocations have been developed to minimise harm to Green Belt purposes including maintaining settlement separation. The Council will carefully consider all representations raising concerns about specific instances where proposed development may lead to coalescence or erosion of settlement separation, and will ensure that the Regulation 19 Publication version of the Local Plan appropriately protects settlement identity and separation through the spatial strategy, Green Belt boundaries, policy requirements, and, where appropriate, protective designations to prevent coalescence and preserve the distinct character and identity of Hertsmere's settlements.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern over the distribution of the spatial strategy	<i>The Council recognises that the spatial strategy must distribute development in a sustainable manner that meets identified housing and employment needs, makes effective use of land including previously developed and lower-quality Green Belt land, supports the role and function of existing settlements, promotes sustainable transport and accessibility, protects and enhances environmental assets and Green Belt, and ensures adequate infrastructure to support growth. The Draft Local Plan spatial strategy directs the majority of development to the borough's main settlements of Borehamwood, Bushey, Potters Bar, and Radlett, reflecting their roles as sustainable locations with good access to services, facilities, employment opportunities, and public transport, whilst also allocating appropriate development in smaller settlements where this supports local needs and vitality, and prioritising previously developed land and lower-quality Green Belt identified through the Green Belt Assessment. The Council will carefully consider all representations raising concerns about the distribution of development across the borough and ensure the Regulation 19 version of the Draft Local Plan presents a sustainable, equitable, and deliverable distribution of growth across Hertsmere that meets the Plan's objectives and the tests of soundness.</i>

Theme	Sub-Theme / Issue	Summary	Response
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposition to proposed approach to discourage large developments outside of major settlements, as this does not take into account the potential for making use of previously developed land outside major settlements or 'grey belt' as defined in paragraph 155 of the NPPF.	<i>The Draft Local Plan spatial strategy directs the majority of development to the borough's major settlements of Borehamwood, Bushey, Potters Bar, and Radlett, reflecting their sustainability credentials, but the Council acknowledges that there may be circumstances where previously developed land or grey belt land outside major settlements could accommodate sustainable development, particularly where sites have good transport links, existing infrastructure capacity, or can be brought forward as part of a comprehensive and well-planned scheme that delivers supporting infrastructure and community benefits. will review whether the spatial strategy and site selection methodology appropriately recognise and prioritise such opportunities in accordance with emerging national policy guidance on grey belt land to inform the Regulation 19 Publication version of the Local Plan.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern that the growth proposed in the spatial strategy will cause impacts to the environment.	<i>The Council recognises that all development has the potential to impact the natural and built environment, and that the Local Plan must ensure that growth is planned and delivered in a way that protects and enhances environmental assets, minimises harm to biodiversity, landscape, heritage, air and water quality, and climate, and achieves environmental net gains. The Draft Local Plan has been subject to Sustainability Appraisal, Habitats Regulations Assessment, and Strategic Environmental Assessment to evaluate the environmental impacts of the proposed spatial strategy, strategic policies, and site allocations, and includes proposed policies to protect and enhance biodiversity and geodiversity (Policy GI1), achieve biodiversity net gain (Policy GI2), protect landscape character (Policy GI5), protect trees and woodland (Policy GI6), ensure sustainable drainage and flood risk management (Policies SD7 and SD8), improve air quality (Policy SD5), achieve carbon reduction and climate resilience (Policies SD1 and supporting policies) and conserve and enhance heritage assets (Policies HE1 Hertsmere's Historic Environment, HE2 Designated Heritage Assets and HE3 Non-Designated Heritage Assets. The Council will carefully consider all representations raising specific concerns about environmental impacts of the spatial strategy or individual site allocations, will review the findings of environmental assessments and supporting evidence, and will ensure that the Regulation 19 Publication version of the Local Plan includes robust environmental protection policies and appropriate mitigation and enhancement measures embedded in site allocation policies.</i>

Theme	Sub-Theme / Issue	Summary	Response
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern that the plans proposed economic strategy is not consistent with national planning policy	<i>The Draft Local Plan economic strategy is informed by the Housing and Economic Development Needs Assessment (HEDNA) and evidence on employment land supply, market demand, and economic trends, and includes proposed policies to support employment development (Policy EC1), protect existing employment sites (Policy EC2), support town centres and retail development (Policies EC11-EC16 and support rural economy and diversification, aiming to provide sufficient employment land to meet projected needs and support the borough's economic prosperity whilst balancing environmental protection and sustainable development objectives. The Council will carefully consider all representations raising specific concerns about the consistency of the economic strategy with national policy to ensure that the Regulation 19 Publication version of the Local Plan includes an economic strategy that is positively prepared, ambitious, deliverable, and fully consistent with the requirements of national planning policy.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Support for the settlement hierarchy and where development should be provided	<i>The Council welcomes this support for the settlement hierarchy. The Council is committed to ensuring that the spatial strategy and settlement hierarchy direct development to the most sustainable and appropriate locations, support the continued prosperity and vitality of Hertsmere's towns and villages, make effective use of previously developed land and infrastructure, promote sustainable travel and accessibility, protect the borough's environmental assets and Green Belt, and deliver high-quality, well-planned development that meets the needs of current and future communities across Hertsmere.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Opposition to the settlement hierarchy and the way that settlements have been classified	<i>The Council recognises that the settlement hierarchy must be based on robust, transparent, and objective assessment of the role, function, sustainability, services, facilities, employment opportunities, public transport accessibility, and development capacity of each settlement, to ensure that development is appropriately distributed according to settlement character and capacity, and that the hierarchy supports sustainable development patterns and meets the tests of soundness. The Draft Local Plan settlement hierarchy has been informed by assessment of settlement size, range of services and facilities including shops, schools, healthcare, community facilities, employment provision, public transport connectivity including rail and bus services, and accessibility to higher-order centres, resulting in the classification of Borehamwood, Bushey, Potters Bar, and Radlett as major settlements, with smaller settlements and villages classified according to their relative sustainability and role. The Council will carefully consider all representations raising concerns about the classification of specific settlements within the hierarchy to ensure that the Regulation 19 Publication version of the Local Plan includes a settlement hierarchy that is robust, justified, transparent, and appropriately reflects the role, function, and sustainability of Hertsmere's settlements.</i>

Theme	Sub-Theme / Issue	Summary	Response
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern that the collective impact of the spatial strategy will impact landscape character across Hertsmere and at the main towns	<i>Further work is being undertaken on the Settlement Visions, alongside wider evidence and engagement. These visions will be completed before the Plan is adopted and sites are allocated. They will inform the key spatial objectives and policies relevant to specific places in Hertsmere, as well as policies on spatially sensitive matters such as building heights. If it is deemed that further detail is required, beyond what is in the Local Plan, the Council will consider subsequently producing settlement specific design codes or standards which would undergo consultation and independent examination before being adopted as Supplementary Plans. However, sites allocated in the Local Plan may come forward prior to such Supplementary Plans being adopted.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	The Settlement Visions Spatial Strategy is not yet available but Key Themes and Priorities have been published. What is the status of this, and will it be adopted as a Supplementary Planning Document? Delivery of housing on sustainable sites should not be held up while awaiting publication of settlement vision documents.	<i>The settlement visions, masterplanning and design work for Borehamwood, Potters Bar, Bushey and Radlett have informed the Regulation 19 place policies, site allocations and relevant design requirements..</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern over the deliverability of sites within the Spatial Strategy	<i>The Council recognises that the Local Plan must be deliverable and effective, with site allocations that are realistic, viable, and capable of being delivered within the plan period, supported by appropriate infrastructure, free from insurmountable constraints, and backed by evidence of landowner willingness and developer interest. The site selection process has been informed by the Housing and Economic Land Availability Assessment (HELAA), which assesses the availability, suitability, and achievability of sites, viability assessments, infrastructure planning through the Infrastructure Delivery Plan, environmental assessments including Sustainability Appraisal and Habitats Regulations Assessment, technical studies on transport, flood risk, heritage, landscape, and ecology, and engagement with landowners, developers, infrastructure providers, and stakeholders to understand delivery intentions, timescales, and constraints. The Council will carefully consider all representations raising specific concerns about the deliverability of individual sites or the overall spatial strategy and will review evidence on site deliverability, undertake additional viability or deliverability assessments where necessary, engage with site promoters and infrastructure providers to clarify delivery expectations, and ensure that the Regulation 19 Publication version of the Local Plan includes a realistic, deliverable, and appropriately phased housing trajectory and spatial strategy with sufficient flexibility and contingency to maintain housing land supply throughout the plan period.</i>

Theme	Sub-Theme / Issue	Summary	Response
Vision, Objectives and Spatial Strategy	Spatial Strategy	Recommendation for exploring sites accessible to the wider road network, such as by the Hillfield substation where there is access on to the A41 or in Shenley where there is access onto the M25 and via Borehamwood and the A1.	<i>The Draft Local Plan spatial strategy prioritises development in the borough's major settlements of Borehamwood, Bushey, Potters Bar, and Radlett due to their sustainability credentials including access to services, facilities, employment opportunities, and public transport, particularly rail connections, whilst the site selection process has considered accessibility, transport impacts, infrastructure capacity, and sustainability alongside other factors including Green Belt harm, environmental constraints, landscape impact, heritage considerations, availability, suitability, and achievability. The Council will carefully consider this and all other representations proposing alternative sites or locations, including sites with good access to the strategic road network ensuring that the Regulation 19 Publication version of the Local Plan includes an appropriate and justified site selection strategy that delivers sustainable development in accordance with national policy across Hertsmere.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Recommendation to consider site to the west of Theobald Street.	<i>The site selection process has been informed by the Housing and Economic Land Availability Assessment (HELAA), Green Belt Assessment, Sustainability Appraisal, Habitats Regulations Assessment, and technical studies covering transport, flood risk, heritage, landscape, ecology, and infrastructure capacity, with sites assessed objectively and consistently to inform the spatial strategy and site allocations in the Draft Local Plan. The Council will carefully consider all representations proposing alternative sites for development, will review whether the site has been assessed through the HELAA process or requires assessment, will evaluate the site's availability, suitability, achievability, sustainability credentials, Green Belt impact, environmental constraints, accessibility, infrastructure requirements, and consistency with the spatial strategy, and will determine whether the site should be allocated in the Regulation 19 Publication version of the Local Plan, taking into account the site's merits relative to other potential allocations, the overall housing land supply position, spatial distribution objectives, and the need to ensure a sound, deliverable, and justified plan that meets development needs whilst protecting Hertsmere's environmental and heritage assets.</i>

Theme	Sub-Theme / Issue	Summary	Response
Vision, Objectives and Spatial Strategy	Spatial Strategy	Recommendation to prioritise sites on flatter land to support active travel.	<i>The Council recognises that promoting active travel including walking and cycling is an important objective of sustainable development, contributing to health and wellbeing, climate change mitigation, air quality improvement, and reduced car dependency, and that site topography can influence the attractiveness and accessibility of walking and cycling as transport modes. The Draft Local Plan includes proposed policies to promote sustainable transport and active travel (Policy TR1), require appropriate provision of walking and cycling infrastructure within new developments (Policy TR2), support improvements to walking and cycling networks across the borough, and prioritise development in sustainable locations with good access to services, facilities, and public transport, reducing the need to travel and supporting modal shift. Whilst topography is a relevant consideration, site selection must balance multiple factors including availability, suitability, achievability, sustainability, accessibility to services and public transport, Green Belt impact, environmental constraints, heritage considerations, infrastructure capacity, and deliverability. Furthermore, active travel can be supported through appropriate site design, layout, connections to existing networks, provision of facilities, and traffic management measures even on sites with more varied topography. The Council will ensure that the Regulation 19 Publication version of the Local Plan includes a spatial strategy and site allocations that appropriately prioritise sustainable and accessible locations, and that policies require all developments to maximise opportunities for active travel through high-quality design, connectivity, infrastructure provision, and integration with existing and planned walking and cycling networks across Hertsmere.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern that Hertsmere Borough Council have not demonstrated that all other brownfield and regeneration opportunities have been explored before proposing development on greenfield.	<i>The Council recognises that planning policies should promote an effective use of land in meeting the need for homes and other uses, giving substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs. The site selection process has been informed by the Housing and Economic Land Availability Assessment (HELAA), which identifies and assesses all available, suitable, and achievable sites including previously developed land, brownfield sites, underutilised urban land, regeneration opportunities, and greenfield sites, and the Draft Local Plan spatial strategy prioritises development on previously developed land within settlements and allocates brownfield sites where these are available, suitable, achievable, and consistent with other planning objectives including environmental protection, heritage conservation, and sustainable development principles. The Regulation 19 Publication version of the Local Plan will demonstrate a clear and justified approach to maximising the use of previously developed land and regeneration opportunities before proposing development on greenfield sites</i>

Theme	Sub-Theme / Issue	Summary	Response
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern over scale of proposed development	<i>The Draft Local Plan proposes development to meet the borough's minimum housing need calculated using the Government's standard method, informed by the Housing and Economic Development Needs Assessment (HEDNA), and seeks to provide sufficient employment land to support economic growth and prosperity, with development distributed across sustainable locations in accordance with the settlement hierarchy and spatial strategy. The Council will carefully consider all representations raising concerns about the scale of proposed development to ensure that the Regulation 19 Publication version of the Local Plan proposes an appropriate scale of development that meets objectively assessed needs, is realistic and deliverable, is supported by adequate infrastructure, respects settlement character and environmental constraints, and represents sustainable development in accordance with national policy and the tests of soundness.</i>
Vision, Objectives and Spatial Strategy	Vision	Supports the vision for Hertsmere	<i>The Council welcomes this support for the vision for Hertsmere. The Draft Local Plan vision for Hertsmere sets out an ambition for the borough to be a thriving, inclusive, and sustainable place with high-quality homes to meet diverse needs, a prosperous economy with varied employment opportunities, vibrant and resilient town centres, well-connected communities with excellent transport links and digital infrastructure, accessible green spaces and enhanced biodiversity, conserved and celebrated heritage assets, climate-resilient and low-carbon development, and strong, healthy communities supported by high-quality services, facilities, and infrastructure. The Council is committed to ensuring that the strategic objectives and policies of the Local Plan translate this vision into deliverable actions and outcomes, that the spatial strategy and site allocations support the vision's realisation, and that implementation, monitoring, and review mechanisms ensure that the Plan remains effective in delivering the vision for Hertsmere throughout the plan period and beyond.</i>
Vision, Objectives and Spatial Strategy	Vision	Opposes the vision for Hertsmere	<i>The Draft Local Plan vision has been developed through community engagement, consultation on issues and options, evidence gathering, and assessment of the borough's development needs, constraints, and opportunities, and seeks to balance the need to provide sufficient housing and employment development to meet identified needs with the protection and enhancement of Hertsmere's environmental assets, Green Belt, heritage, settlement character, and quality of life. The Council will carefully consider all representations raising opposition to the vision and will review whether amendments or refinements to the vision are necessary to ensure that the Regulation 19 Publication version of the Local Plan includes a vision that is positively prepared, reflects effective engagement, commands broad support, appropriately addresses the borough's needs and challenges, and provides a sound basis for the Local Plan's strategy and policies.</i>
Vision, Objectives and Spatial Strategy	Vision	Recommendation to place a greater emphasis on the natural environment within the plan vision	<i>The Council will ensure that the Regulation 19 Publication version of the Local Plan includes a vision and strategic objectives that give appropriate prominence and ambition to protecting, enhancing, and restoring the natural environment as a fundamental component of sustainable development</i>

Theme	Sub-Theme / Issue	Summary	Response
Vision, Objectives and Spatial Strategy	Spatial Strategy	Recommendation for Hertsmere Borough Council to adopt a countryside and landscape led approach rather than growth-led approach as set out in the consultation version of the Local Plan.	<i>The Council recognises that the Local Plan must balance multiple objectives including meeting objectively assessed development needs for housing and employment, protecting and enhancing the natural and built environment including Green Belt, landscape, biodiversity, and heritage assets, supporting economic prosperity and community wellbeing, and ensuring sustainable development that respects local character and environmental constraints. The Draft Local Plan seeks to balance these objectives by meeting the borough's minimum housing need calculated using the Government's standard method whilst directing development to the most sustainable locations, prioritising previously developed land where available, minimising harm to Green Belt purposes through the application of exceptional circumstances and the Green Belt Assessment evidence, and including robust policies to protect and enhance landscape character, biodiversity, trees and woodland, heritage assets, and environmental quality. The Council will carefully consider this recommendation to adopt a countryside and landscape-led approach. It will review whether the spatial strategy and site selection appropriately balance development needs with environmental protection, whilst recognising that national policy requires the Council to plan positively to meet objectively assessed needs and that a failure to plan adequately for housing and employment development would be inconsistent with the legal duty to prepare a sound Local Plan and could result in unplanned, speculative development through the appeal process.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	General view that all forms of sustainable development, not just housing, should be considered as an exception to the spatial strategy	<i>The Regulation 19 spatial strategy directs major growth to the four main towns and resists major housing development in smaller settlements. Limited provision is made for single infill dwellings delivering self or custom-build housing and/or affordable housing meeting specific local needs, while separate policies address appropriate rural economic and community uses.</i>

Theme	Sub-Theme / Issue	Summary	Response
Vision, Objectives and Spatial Strategy	Spatial Strategy	Recommendation for consideration to be given to the cumulative impacts from development	<i>The Council recognises that the Local Plan must assess and address the cumulative impacts of proposed development on infrastructure, services, the environment, heritage assets, highways, air quality, flood risk, biodiversity, landscape character, and community amenity, ensuring that the combined effects of multiple developments do not result in unacceptable impacts on existing communities, environmental quality, or the proper functioning of infrastructure networks. The Draft Local Plan has been subject to Sustainability Appraisal, Strategic Environmental Assessment, Habitats Regulations Assessment, transport modelling and assessment, Infrastructure Delivery Plan preparation, and other technical studies which consider the cumulative impacts of the proposed spatial strategy and site allocations on environmental, social, economic, and infrastructure considerations, informing policy development, mitigation requirements, and infrastructure planning. The Council will ensure that the Plan's policies require development proposals to assess and mitigate cumulative impacts in combination with committed and planned developments and will ensure that the Regulation 19 Publication version of the Local Plan demonstrates a robust and comprehensive approach to identifying, assessing, and mitigating cumulative impacts to protect the environment, infrastructure, and quality of life for existing and future communities across Hertsmere.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern that approach to development undermines the spatial strategy	<i>The Draft Local Plan spatial strategy directs the majority of development to the major settlements of Borehamwood, Bushey, Potters Bar, and Radlett due to their sustainability, accessibility, services, facilities, and infrastructure capacity, with more limited development in smaller settlements and strict control in the Green Belt and countryside, and this strategy is reflected in the distribution of site allocations, housing and employment targets, infrastructure planning, and development management policies. The Council will review whether site allocations, policy requirements, distribution of development, and flexibility mechanisms are consistent with and support the delivery of the spatial strategy ensure that the Regulation 19 Publication version of the Local Plan presents a coherent, integrated, and internally consistent spatial strategy supported by appropriately distributed site allocations and development management policies that collectively deliver sustainable development in accordance with the Plan's vision, objectives, and national policy requirements..</i>

Theme	Sub-Theme / Issue	Summary	Response
Vision, Objectives and Spatial Strategy	Spatial Strategy	General comment about strategic policy	<i>The Regulation 19 Local Plan's overarching spatial strategy is set out principally through Policy HBF1 (Delivering a Better Future for Hertsmere), supported by the strategic policies contained throughout Parts 1 and 2 of the Plan..</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Support for the spatial strategy subject to appropriate consideration of designated sites and wider biodiversity in policy	<i>The Council welcomes this support for the spatial strategy. The Council confirms that the spatial strategy and site allocations have been subject to rigorous assessment of environmental constraints and opportunities including habitats regulations assessment ensuring no adverse effects on European designated sites. The Local Plan will include strategic policies and site allocation policies that provide appropriate and robust protection for designated sites and wider biodiversity.</i>
Vision, Objectives and Spatial Strategy	Objectives	Request for amendment to one of the Key Spatial Objectives	<i>The Draft Local Plan Key Spatial Objectives cover themes including delivering sustainable growth, meeting housing need, supporting economic prosperity, protecting and enhancing the environment and heritage, promoting design quality and placemaking, addressing climate change, providing infrastructure and services, promoting healthy and inclusive communities, and protecting the Green Belt and landscape character, with these objectives informing the spatial strategy and strategic policies. The Council will carefully consider this request for amendment to the Key Spatial Objective and review whether the suggested amendment would strengthen the clarity, ambition, deliverability, or alignment with evidence and national policy of the spatial objectives. The spatial objectives will be clearly articulated, evidence-based, ambitious yet deliverable, responsive to community priorities and consultation feedback, and provide a robust foundation for delivering sustainable development and achieving the Plan's vision for Hertsmere's future.</i>
Vision, Objectives and Spatial Strategy	Spatial Strategy	Concern that planning permissions granted for housing developments in Shenley in 2025/26 are contrary to the spatial strategy and therefore should be perceived as contrary to policy and should be withdrawn	<i>Planning permissions that have been lawfully granted following proper assessment against the adopted development plan, national policy, and material considerations are valid permissions that establish lawful development rights, and the Council does not have legal powers to withdraw or revoke planning permissions that have been lawfully granted except in exceptional circumstances. The emerging spatial strategy in the Draft Local Plan will inform future planning decisions with increasing weight as the plan progresses through examination and towards adoption but carries limited weight at this stage.</i>

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