

# **Hertsmere Local Plan Regulation 18 Public Engagement**

**Interim Report of comments made on the draft  
Hertsmere Local Plan (September 2021) during the  
Regulation 18 Public Engagement**

**April 2022**



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## 1. Introduction

- 1.1 This report provides an interim review of the public engagement undertaken by Hertsmere Borough Council on its draft Local Plan between October and December 2021. The public engagement was undertaken under Regulation 18 of the regulations following a series of other public consultations previously undertaken in relation to the preparation of a new plan for the borough.
- 1.2 Work on the new draft Local Plan commenced in late 2016, with an initial launch accompanied by a survey, stakeholder briefings and a newsletter distributed to all households. This was followed by public consultation on a series of Issues and Options in December 2017, which was also accompanied by public exhibitions and newsletter distribution to all households. In late 2018, feedback was sought on sites submitted to the Council by landowners, developers and site promoters. Once again, a newsletter was distributed to all households and public exhibitions were held, resulting in approximately 2,100 people submitting responses to the Council. All previous newsletters, consultation documents and post-consultation reports can be viewed on the Local Plan microsite at:
- <https://www.hertsmere.localplan.com/site/resourcesPage>
- 1.3 Informed by the public consultation undertaken to date and a series of independent technical studies commissioned by the Council, a draft Local Plan was produced in 2021. The Council resolved to issue the plan under Regulation 18, rather than proceed straight to a Regulation 19 plan, which would require the published plan to be submitted to the Secretary of State for independent examination following receipt of representations. This allowed for a full comprehensive public engagement to be conducted, sites and policies to be 'tested' and further changes to be made to the plan ahead of public examination. This approach also provided additional time for outstanding technical work and engagement with key stakeholders, including infrastructure providers, to be completed.

## 2. Status of this report

- 2.1 The public engagement, which closed on 6<sup>th</sup> December, produced almost 18,000 responses, the largest response to any plan or other report issued by the Council. Officers within the planning department have focussed on processing and reviewing the responses received, with additional resources allocated to ensuring that this complex task can be completed expeditiously. It has been a significant logistical undertaking due, in particular, to responses being submitted through a variety of channels, in addition to the Council's consultation portal, which itself received over 2,000 responses.
- 2.2 This report has been prepared within four months of the close of the public engagement and should be regarded as an interim report. It does not include officers' technical responses to the various issues made by respondents or set out what detailed changes could be made to the plan in response to those representations. As such, this report is limited to reporting a summary of the issues raised only and does not consider the merits of individual submissions. A final report on the Main Issues raised, along with an explanation of how they have been taken into account when preparing the next version of the Local Plan, will be issued alongside the publication of a revised local plan.

### 3. Public engagement period and processing of responses

- 3.1 The public engagement commenced on Monday 11<sup>th</sup> October 2021, although the draft Local Plan was available to view several weeks earlier via the committee pages on the Council's website ahead of the meeting of the Executive on 14<sup>th</sup> September. Much of the content of the bespoke website was also available to view for a several weeks prior to the public engagement commencing. The public engagement also provided an opportunity for responses to be made on the accompanying Sustainability Appraisal and other technical reports.
- 3.2 The engagement closed on 6<sup>th</sup> December 2021 and the engagement programme lasted for a total of eight weeks, including a two-week extension period to accommodate for issues relating to the planning portal. The portal issues were resolved within 24 hours of being identified.
- 3.3 A limited number of responses continued to be submitted after the closing date. The majority of these were the standardised template responses generated through campaign websites. Officers continued to accept submissions from residents through to 15<sup>th</sup> December, the date on which a preliminary overview of the public engagement was reported to the Council's Member Planning Panel. A very small number of responses from organisations have been submitted since this date, primarily where those organisations have indicated their submission would be late. The reason for accepting certain late responses is that Officers consider it important to obtain the views of specific consultation bodies that are listed in the Regulations<sup>1</sup> governing the production of Local Plans, such as providers of key infrastructure. A few template responses continued to come since 15<sup>th</sup> December but given their largely identical content, officers do not consider that any new issues will have been raised and these have not been counted in the final totals being reported.
- 3.4 Responses were received through a variety of channels, as set out in Table 1 below. Almost two-thirds of the responses were submitted via a campaign website which generated an email containing a standardised template response. Although different templates responses were created for different geographical locations, officers have reviewed the template responses and the vast majority, for a particular area, contained identical text. A copy of each of the template responses is attached in Appendix 2 of this report. Officers estimate that at least 2% of template submissions were duplicates and inadvertently submitted twice by the same individual through the campaign website; as these were submitted through an external website, it is unclear whether this was due to problems with the site, user error or a combination of both.
- 3.5 A digital survey also attracted almost 1,500 responses, providing an opportunity for residents to respond to a series of multiple-choice type questions, together with a free text section for further comments. Hard copies of the survey were available at deposit points with pre-paid envelopes and a limited number, comprising less than 1% of survey responses, were completed in this way. Some of those completing the survey will have also submitted separate, individual responses.
- 3.6 Officers have identified that around 6,200 of the responses should be regarded as bespoke or individualised responses. These were submitted by statutory bodies, national interest groups, community and campaign groups and developers, as well as local residents. A small number of responses were received from beyond the local area including London boroughs, Stevenage, Luton and further afield. The total number of individual responses includes the large number of comments provided at the end of the digital survey.

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<sup>1</sup> [Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(as amended\)](#)

- 3.7 All the individual responses received have now been uploaded into the Council’s consultation portal, with an electronic copy of the full original submission saved elsewhere (including postal responses which have since been scanned in). The contact details for individuals who submitted template responses are being bulk loaded into the consultation database, so that they can be notified of future local plan consultations and events.
- 3.8 Comments posted on the Council’s social media channels or other social media pages have not been counted within the overall number of responses. However, petitions created through third party websites and submitted to the Council, have been accepted as responses to the public engagement.

**Table 1. Summary of response types to Regulation 18 draft Local Plan**

<b>Type of response</b>	<b>Total number of responses</b>
HBC consultation portal	2,332
Email	1,518
Postal	862
Digital survey	1,486
Template responses	11,372
<b>Total</b>	<b>17,570</b>
Petitions	4,734 names (as at 15/12/22) <ul style="list-style-type: none"> <li>• Bowmans Cross (1,924 names)</li> <li>• Site BE3 (Cowley Hill), Organ Hall and Proposed Media Quarter (1,054 names)</li> <li>• Development in Bushey (1,201 names)</li> <li>• Development in Radlett (522 names)</li> <li>• Harris Lane, Shenley (33 names)</li> </ul>

## 4. Geographic and demographic distribution of responses

- 4.1 Responses to the draft plan were received from across the borough and in connection with sites in all locations. Over 95% of the responses have been identified as being submitted by residents. Submissions were also made by residents beyond the borough boundary including, in particular, from London Colney and Colney Heath, whose residents also received copies of the Local Plan newsletter. Table 2, provides a breakdown of the geographic distribution of responses based on submissions where a postcode was provided; over 3,700 responses provided this information, amounting to around 60% of the individual responses.

**Table 2: Responses by area**

Area	Digital survey	Individual submissions	Template responses
Aldenham Villages	3%	3%	No template
Borehamwood and Elstree	16%	15%	27%
Bushey	24%	20%	18%
Colney Heath/London Colney	4%	5%	12%
Elstree Village	1%	0%	6%
Potters Bar	18%	25%	8%
Radlett	19%	16%	20%
Shenley	7%	7%	8%
South Mimms/Ridge	2%	3%	No template
Others	6%	6%	1%

1. Numbers may not tally due to rounding; individual submissions from Elstree were 0.3% of total.
2. Digital survey based on postcodes provided within each survey response.
3. Locations for individual submissions where address provided.
4. Template totals based on subject title in website-generated template email e.g. Save Borehamwood, Save Radlett.
5. Template total for Potters Bar includes other standard letters created locally.

## 6. Survey responses

- 5.1 Almost 1,500 people responded to the digital survey created as part of the overall public engagement and this section provides an analysis of those responses received. The survey (a full copy of which is attached in Appendix 1) was divided into three main parts:

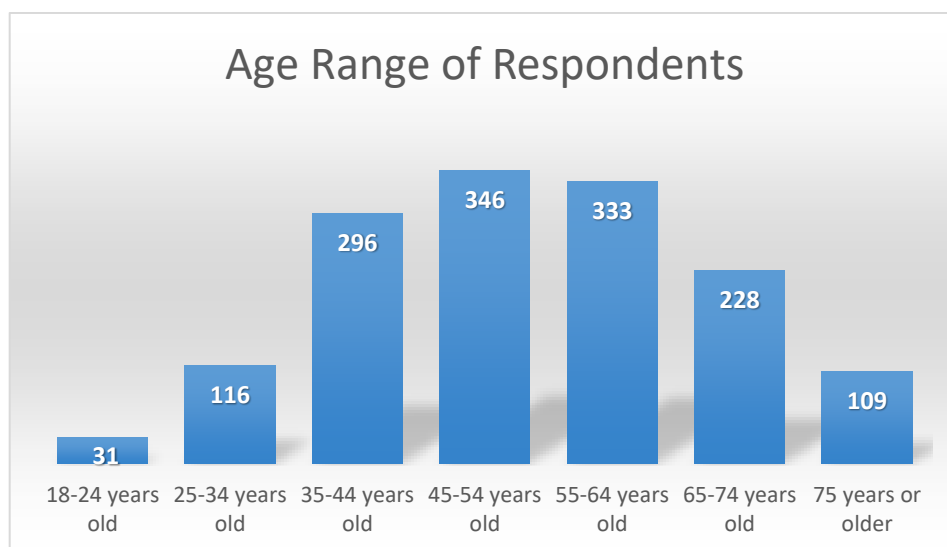
Part 1- Demographic information including the basis for the respondents' interest in the local plan

Part 2 - 14 multiple choice questions across the seven themes contained in the draft plan's Vision and Objectives: Future Hertsmere, Hertsmere Works, Green Hertsmere, Healthy, Hertsmere, Creative Hertsmere, Connected Hertsmere and Distinctive Hertsmere

Part 3 - A free text section which was completed by over 90% of those completing the survey

### Demographic breakdown

- 5.2 Responses were received across all adult age groups with the largest proportion of survey responses being completed by 45-54 year olds (23%) and the lowest proportion by 18-24 year olds (2%).



- 5.3 Survey responses were received from all urban and rural settlements in the borough as well as a number of locations nearby, particularly London Colney and Colney Heath (in the St.Albans City & District Council area). Responses were also received from further afield, but over 90% were submitted from within Hertsmere. Based on the postcode information provided, responses have been identified as being submitted from the following areas, as set out in Table 3
- 5.4 Respondents were asked for the basis for their interest in the Local Plan and were able to select one or more of a number of options such as being a resident, business owner, family connections and so on. 92% of those who responded indicated that they were resident in the borough. A breakdown of the responses is set out in Table 3.

**Table 3: Derivation of survey responses**

Hertsmere settlements	Number of responses		Out of borough locations	Number of responses
Aldenham Villages	50		Barnet	12
Borehamwood and Elstree	249		Brookmans Park	4
Bushey	350		Colney Heath	23
Elstree Village	10		Enfield	4
Potters Bar	271		Goffs Oak	4
Radlett	283		Harrow	5
Shenley	101		Hatfield	7
South Mimms/Ridge	32		London Colney	31
<b>Total</b>	<b>1346</b>		Other north London	11
			St Albans	4
			Watford	14
			Others	18
			<b>Total</b>	<b>137</b>

**Table 4: Survey respondents' interest in the draft Local Plan**

Interest in the draft Local Plan	Number of residents
Resident in the borough	1360
Work in the borough	226
Own a business in the borough	84
Visit the borough for leisure	183
Children at school in the borough	227
Use local facilities in the borough	578
Family in the borough	446
Other	99 (most common answer was living outside the borough)

Note: Respondents were able to select more than one option

#### Responses to individual survey questions

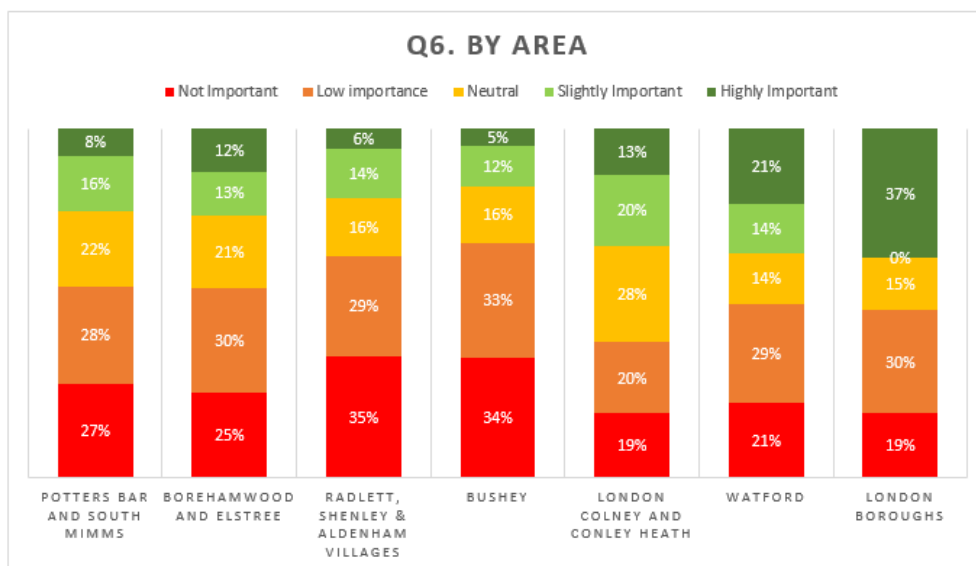
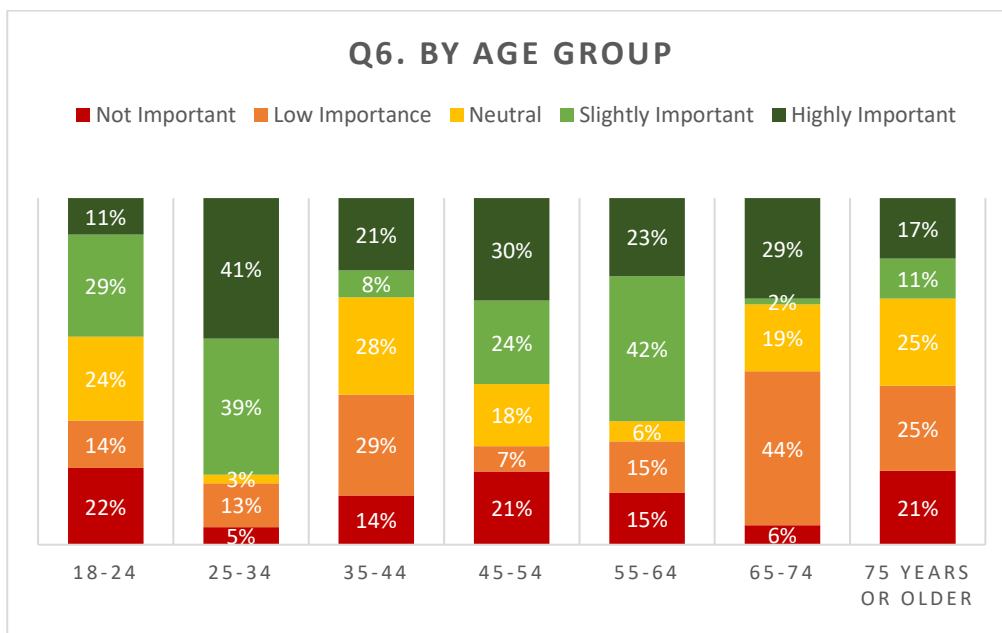
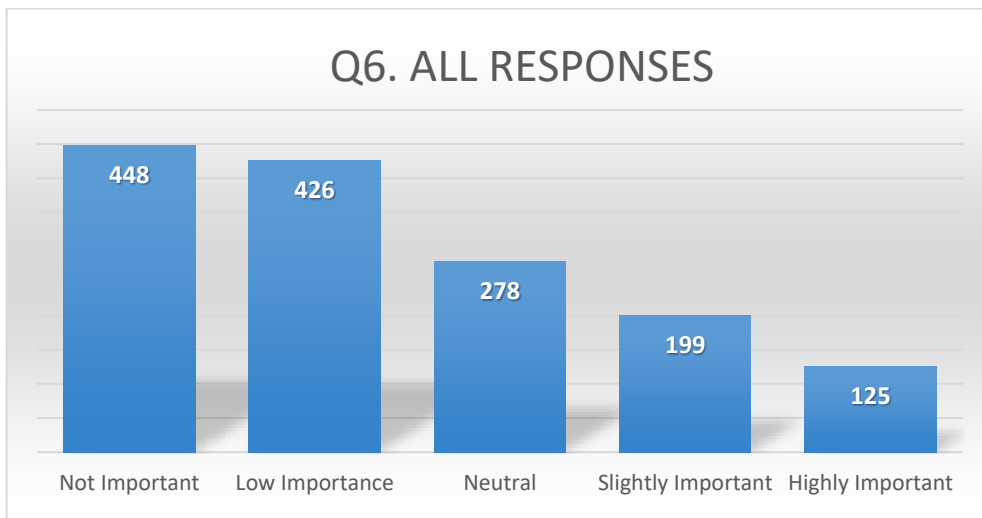
- 5.5 The first five questions were demographic questions. Questions 6 to 19 were multiple choice questions with a series of statements, requiring an option to be selected regarding the level of agreement or importance which the respondent considered applied.

#### **Q6. Rate how important the local need for new homes is to you**

- 5.6 Given the evidenced extent of local housing need, this question sought to understand whether this priority was reflected in the views of the community. However, the overall response to this question indicates that a clear majority of people do not regard the need for new homes in their area as being particularly important. Around a fifth of respondents were 'neutral' on this key planning issue.
- 5.7 When broken down by age group, more people between 25 and 34 years old considered this to be important, than any other age group and by some margin. This probably reflects the difficulties this age group, in particular, experience in accessing the housing market. Conversely, far fewer of those over 65 and in particular, those over 75, considered the need for more housing to be important. The 18-24 year old age group contained the smallest proportion of respondents who considered the need for new homes to be highly important; however, this was very a small sample (2% of respondents) and may reflect the fact that many within this age group, are still studying and are yet to contemplate entering the housing market.



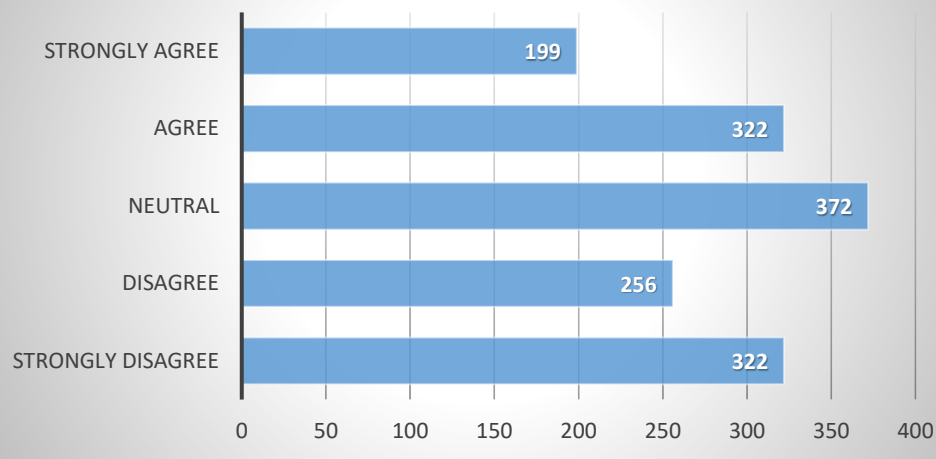
5.8 There were some modest variations across geographic areas in terms of the views expressed. The greatest proportion of those not considering new homes to be important was within Bushey and Radlett. Only locations outside of the borough had fewer than 50% of respondents who considered new homes to be not important or of low importance.



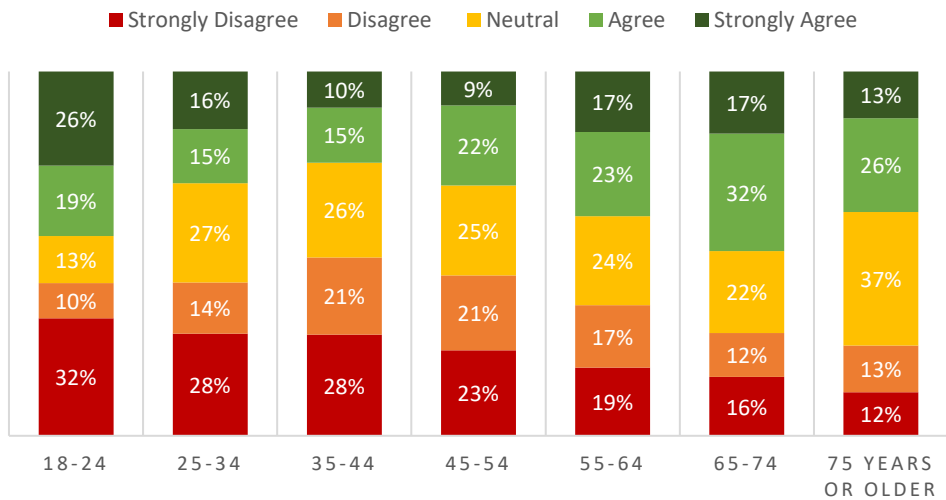
## **Q7. Hertsmere needs more genuinely affordable homes**

- 5.9 The wording in this question reflected the view stated in many individual residents' responses in relation to the lack of affordable housing locally, despite their opposition to the draft plan. The question itself, was prefaced by a statement emphasising that the draft plan "proposes that 40% of new homes must be affordable compared to buying or renting on the open market." However, the responses to this question indicate that a narrow majority of residents do not agree with the view that the borough needs more 'genuinely affordable' homes. Less than 15% of respondents strongly agreed with this.
- 5.10 When broken down by age group, the pattern was somewhat variable. The proportion of respondents who strongly disagreed with the statement decreased by age but the highest proportion of those agreeing overall with the statement were 65-74 year olds.
- 5.11 As with Question 6, there was a higher proportion of respondents from Bushey and Radlett who did not agree with the statement. The Borehamwood area reported the highest proportion of those agreeing that there was a need for more affordable homes. However, levels of agreement with this statement were modest across all locations inside and outside of the borough, with the exception of the Watford area, where nearly half of respondents agreed with the statement.

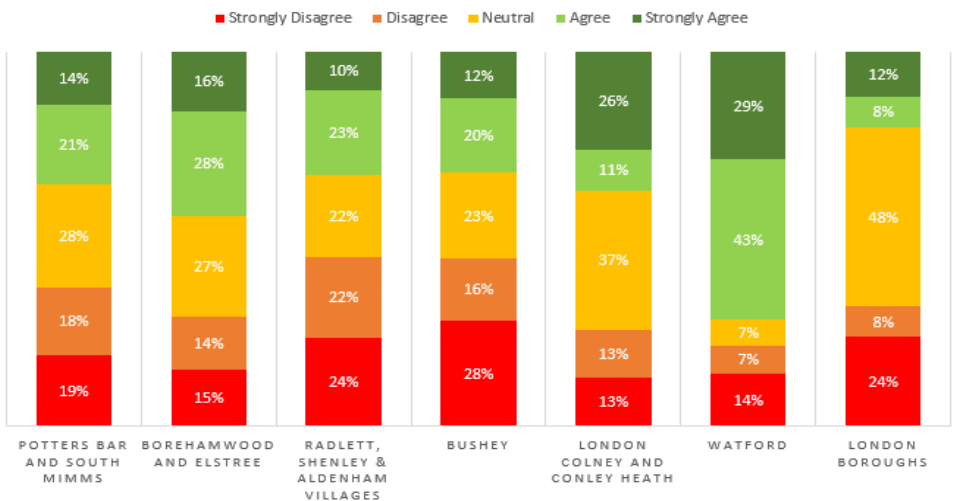
## Q7. ALL RESPONSES



## Q7. BY AGE GROUP



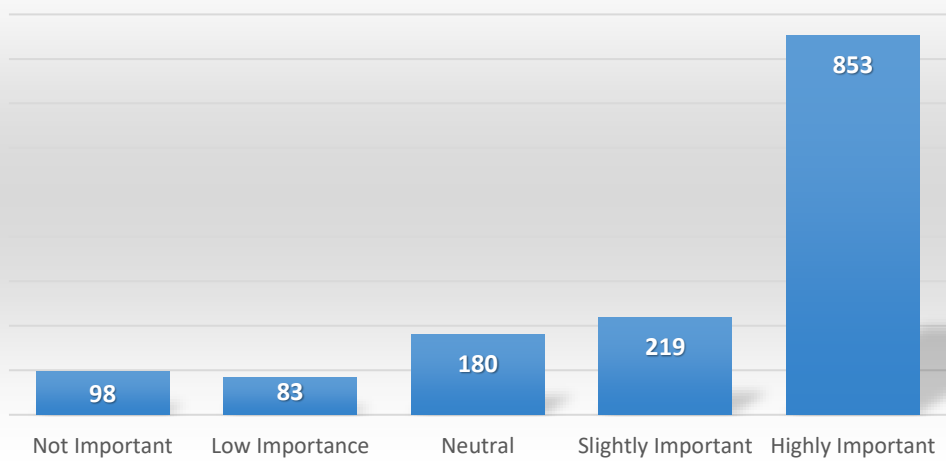
## Q7. BY AREA



**Q8. Rate how important local infrastructure and services investment is to you.**

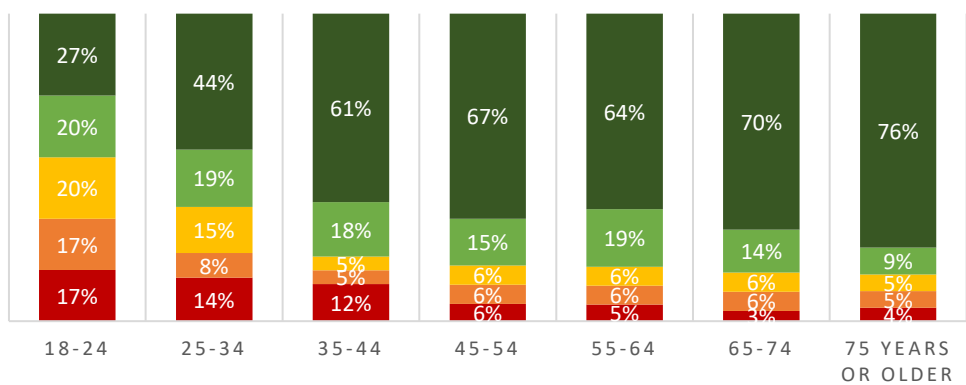
- 5.12 In contrast to the questions on the need for more homes and affordable housing, there was a very high level of consensus on the importance of local infrastructure and services. Over 70% of all respondents considered these to be important, with the majority regarding these as 'highly important'.
- 5.13 The proportion of those considering investment in local infrastructure and services to be important, very clearly increased with age with twice as many of those over 75 stating, it was important compared to the 18-24 age group. This is likely to reflect the increased reliance on a range of local facilities as the community ages, with well over half of all those within the over-35 age groups regarding this as highly important. The area with the highest proportion of those reflecting these views were in Borehamwood, with almost 50% more of those responding, when compared to those in Bushey, considering local infrastructure and services to be highly important.

## Q8. ALL RESPONSES



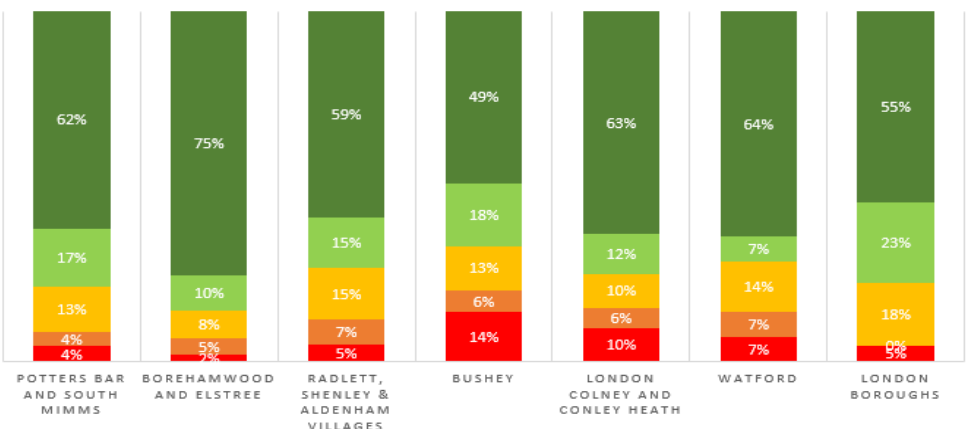
## Q8. BY AGE GROUP

■ Not Important ■ Low Importance ■ Neutral ■ Slightly Important ■ Highly Important



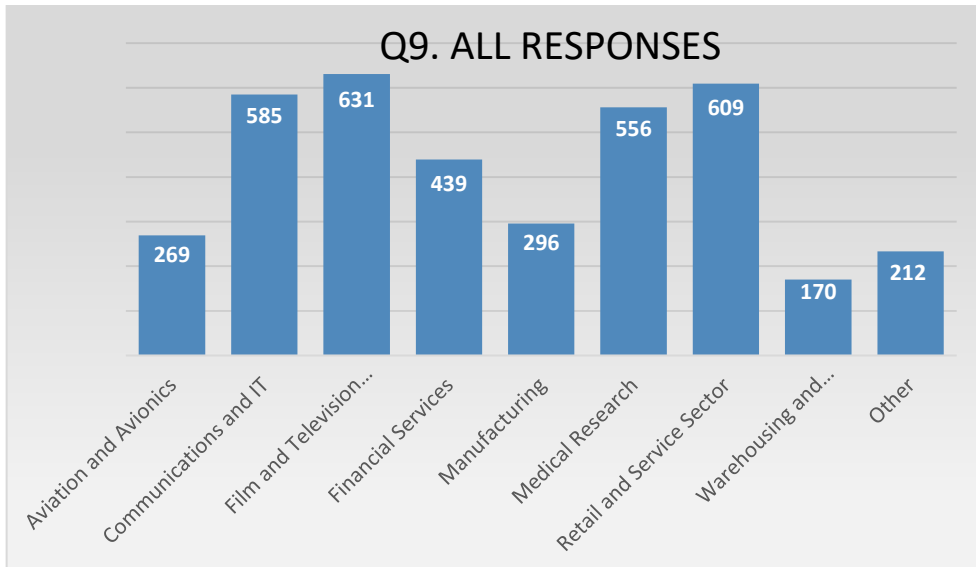
## Q8. BY AREA

■ Not Important ■ Low importance ■ Neutral ■ Slightly Important ■ Highly Important

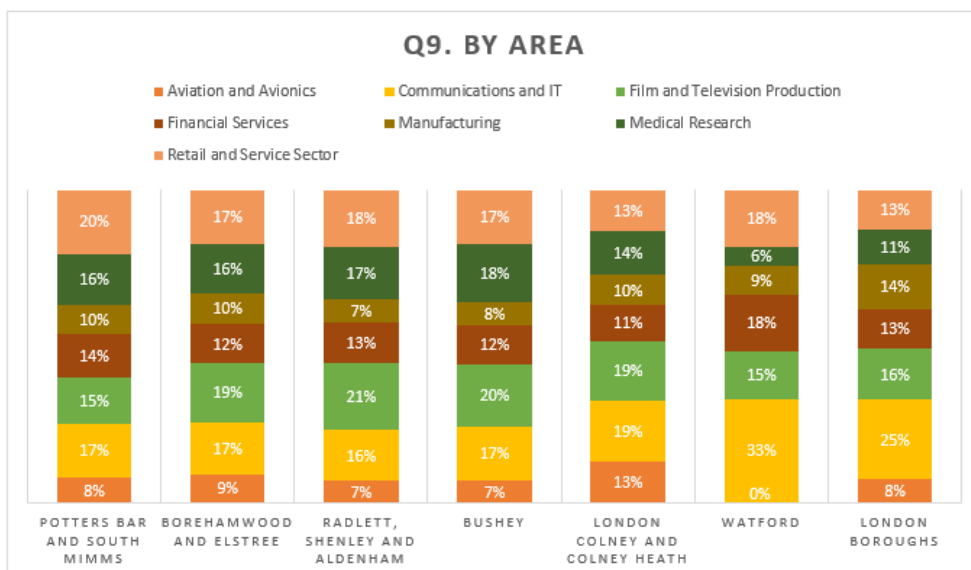
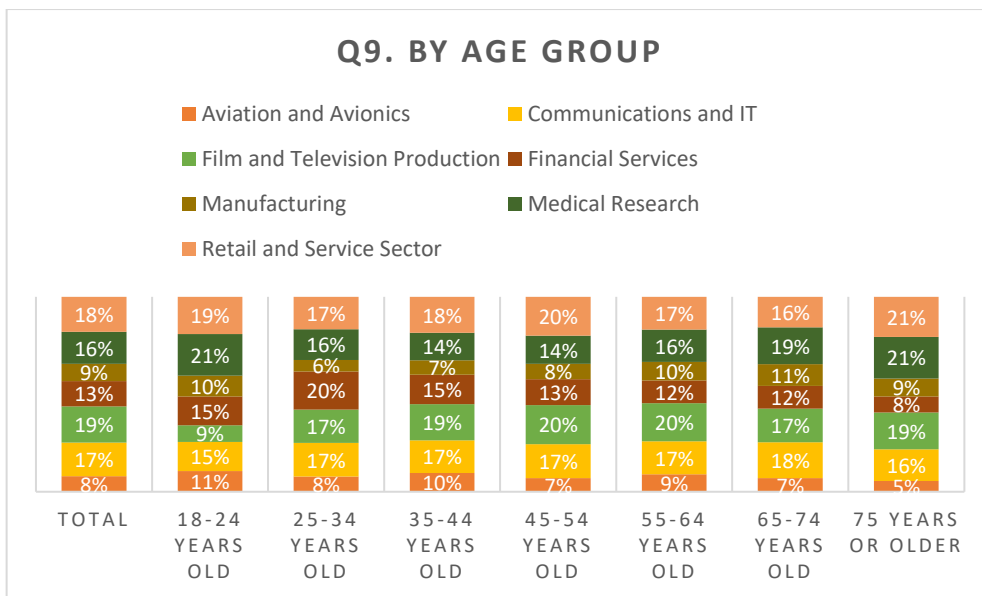


**Q9. What type of jobs would you like to see created and supported in Hertsmere?**

- 5.14 Respondents were able to select more than one job type when responding to the question on employment growth in the borough. Film and television production generated the highest number of responses being selected by over 40% of those completing the question and reflecting the importance of the area as a hub for that particular employment sector. High responses were also received in relation to communications and IT and the retail/service sector, whereas warehousing and distribution, although forming a key part of the economy and for which an independent technical study has identified considerable need, was only selected by 11% of respondents. A wide selection of 'other' employment categories was also suggested, the most common being health and/or social care (27), education (21), none needed (18), any jobs (12), green/environmental (9), agriculture (7), small businesses (6) and zoos (4).
- 5.15 There was no significant variation by area or age in the responses given although it should be noted that Borehamwood and Elstree only had the third highest proportion of those supporting growth in the film and TV industry. The most significant variation, albeit based on a small number responding within the youngest age group, was the proportion of 18-24 year olds supporting growth in film and television production; the proportion was around 50% of that supporting growth in the sector in other age groups.



Note: The most common answers under 'other' were: health and/or social care (27), education (21), none needed (18), any jobs (12), green/environmental (9), agriculture (7), small businesses (6), local and/or independent shops (5), zoos (4)

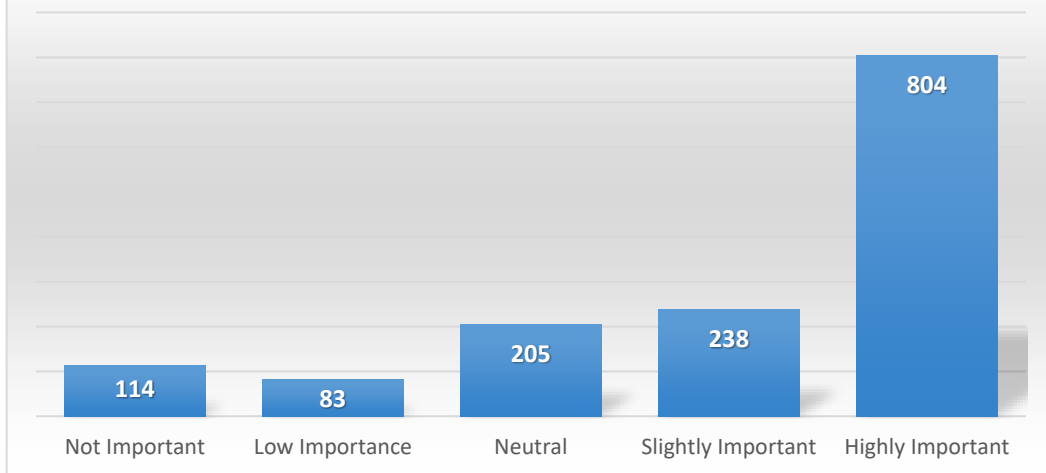


**Q10. Rate how important you think it is to plan for development which meets our environmental, social and economic needs.**

- 5.16 There was also a large majority of respondents who considered planning for our environmental, social and economic needs to be important, with over half considering this to be highly important and fewer than 10% considering this to be not important. Although environmental, social and economic needs cover a broad spectrum of requirements, the response to this question reflects the conflicts which exists when preparing a local plan given the often competing social, economic and environmental demands. The social needs of an area are, in part, addressed through ensuring there is sufficient housing for the community yet the response to the housing-related questions suggest that this is not regarded as important by many due, in part, to environmental considerations.
- 5.17 There was relatively little variation amongst age groups to this question with over half of respondents in all age groups considering planning for environmental, social and economic needs to be highly important. The proportion of those disagreeing with this was lowest in the 18-24 age group, albeit based on a small sample from within the youngest age category. When broken down by geographic area, there was relatively little difference across different locations, although Bushey was the one area where fewer than 50% of those responding considered the environmental, social and economic needs to be highly important.

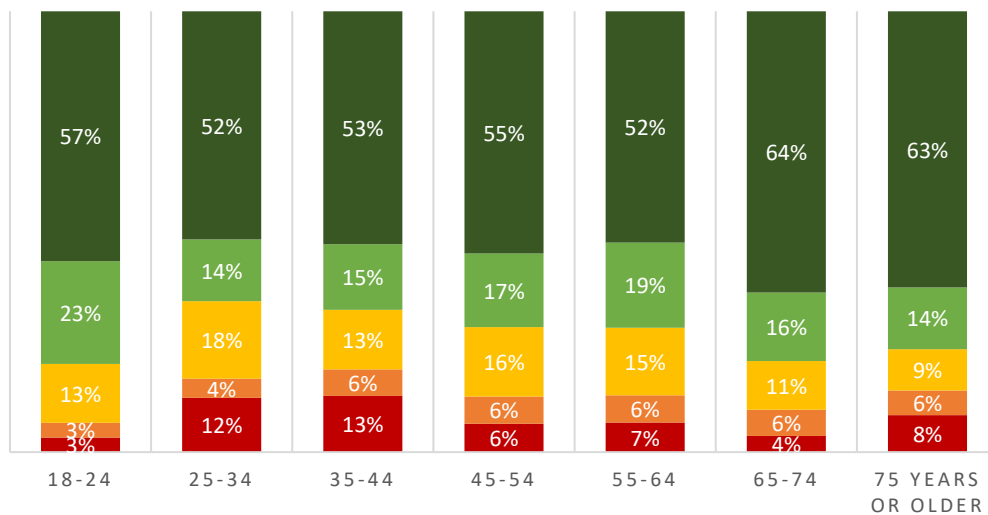


## Q10. ALL RESPONSES



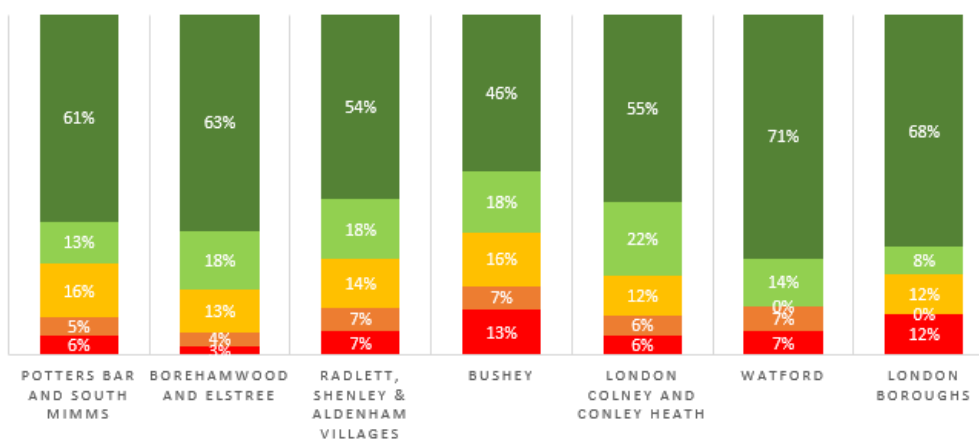
## Q10. BY AGE GROUP

■ Not Important ■ Low Importance ■ Neutral ■ Slightly Important ■ Highly Important



## Q10. BY AREA

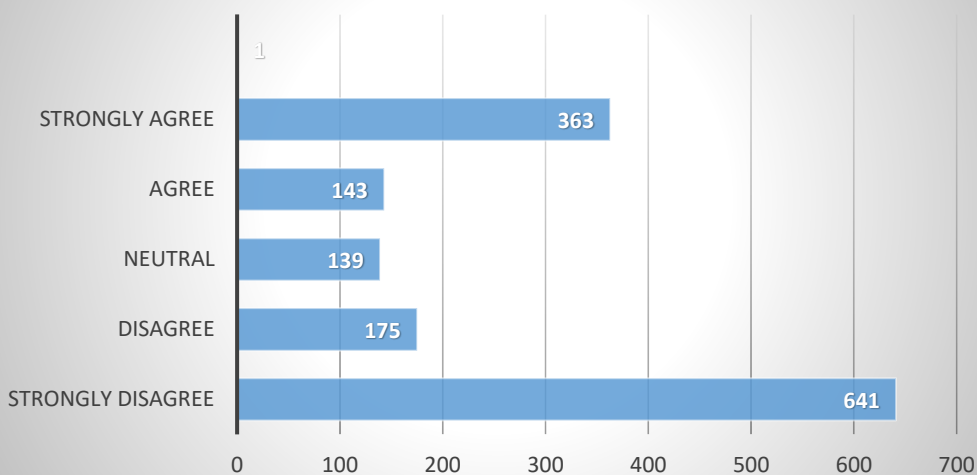
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**Q11. I think that further opening up access to green space is important**

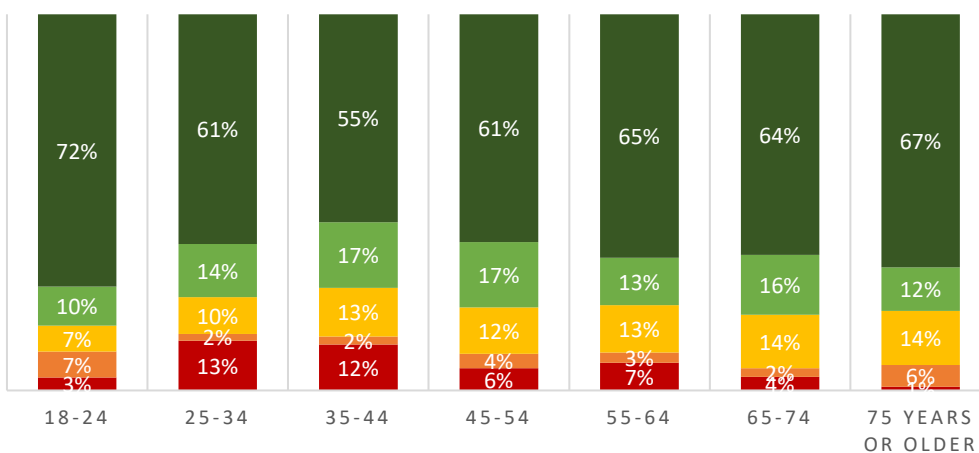
- 5.18 This question was framed within the context that planning for growth will also open up access to green space. The draft Local Plan is clearly predicated on the need for any Green Belt boundary changes to be accompanied by compensatory Green Belt improvements which improve access and environmental quality. Although a large proportion of residents' objections to the plan emphasised the importance of the Green Belt and access to open space, over 50% of those responding did not agree that opening up access to green space was important as part of the growth strategy; a significant proportion of these strongly disagreed. This suggests that compensatory Green Belt improvements, a requirement of national planning policy, are not seen by many residents as a 'quid pro quo' for Green Belt boundary changes.
- 5.19 There was relatively little difference amongst age groups to this question. By location, there was a modest increase in the Radlett and Bushey areas in the proportion of those strongly disagreeing with the need for opening up access to green space, as part of new development. The only area in the borough where fewer than 50% disagreed with the statement was in Potters Bar.

## Q11. ALL RESPONSES



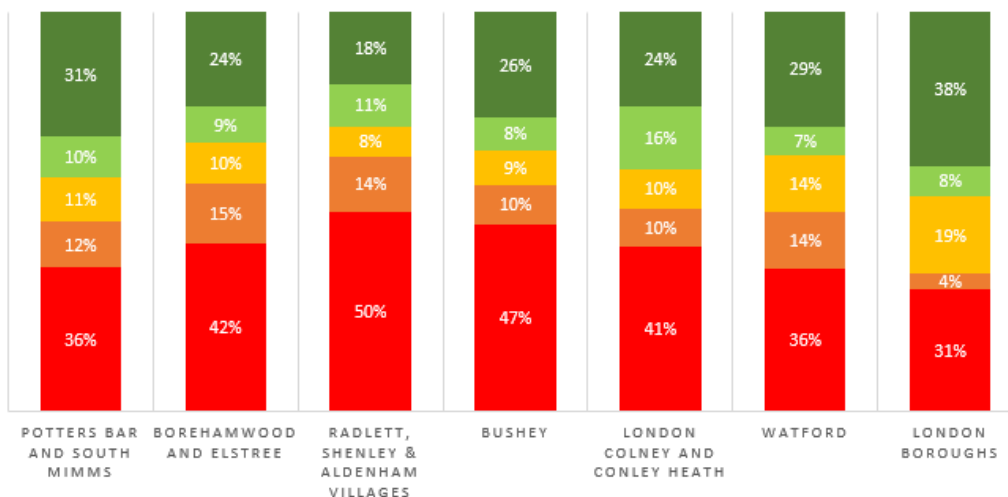
## Q11. BY AGE GROUP

■ Not Important ■ Low Importance ■ Neutral ■ Slightly Important ■ Highly Important



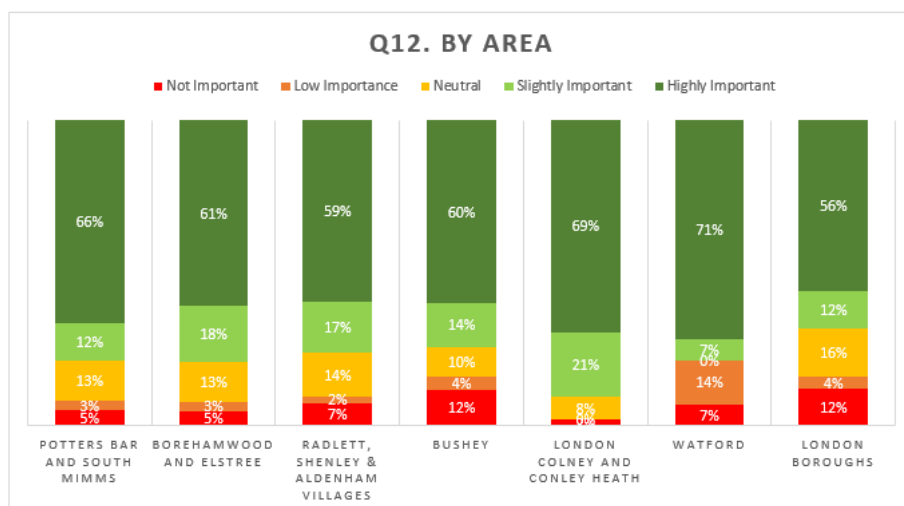
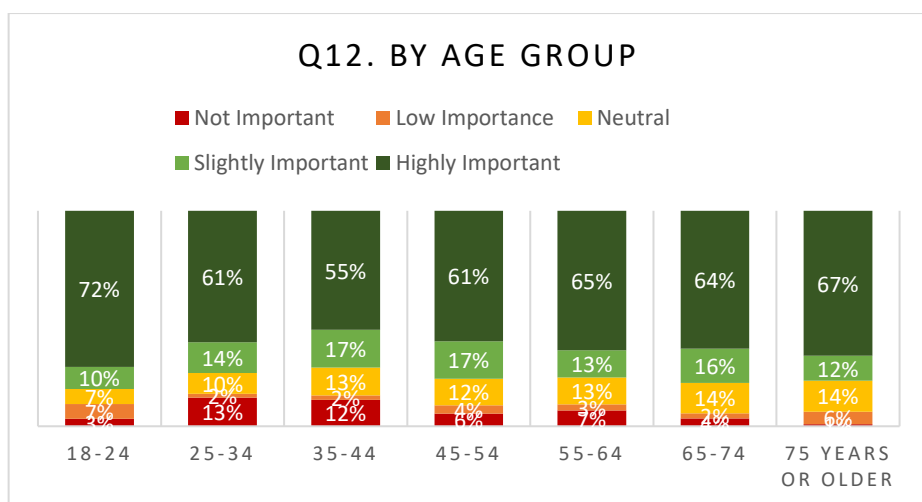
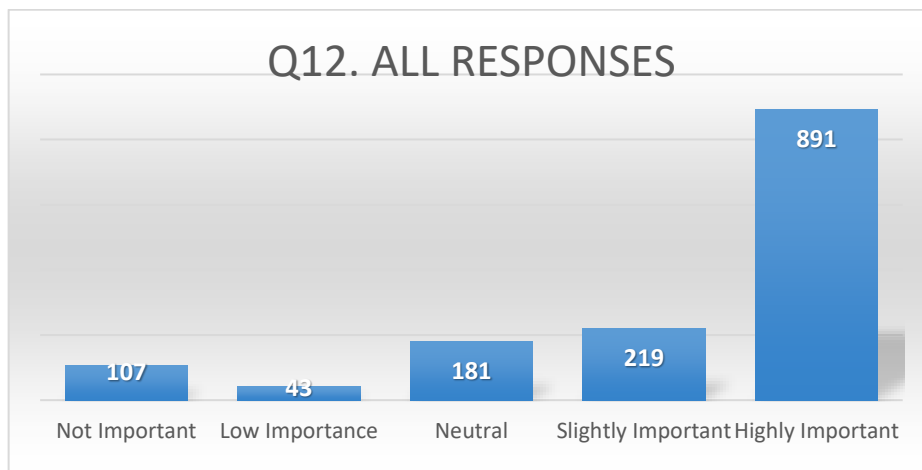
## Q11. BY AREA

■ Strongly Disagree ■ Disagree ■ Neutral ■ Agree ■ Strongly Agree



**Q12. Rate how important it is that new development sites are designed so that they respond to climate change.**

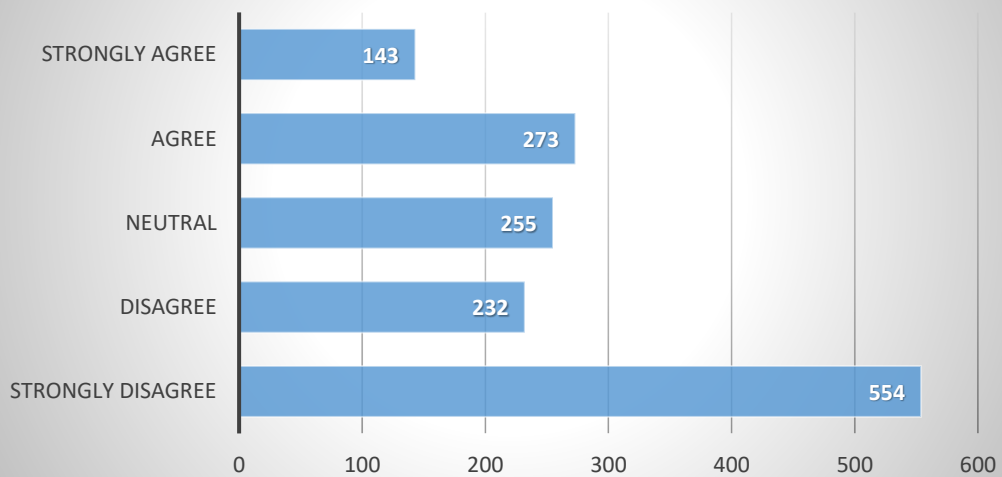
5.20 The importance of new development responding to climate change was a view clearly shared by a large majority of respondents with 75% agreeing, with most stating it was highly important. The age group with the largest proportion agreeing, was 18-24 year olds but there was clear support for addressing climate change in new development across all age groups. There was also little geographic variation with the proportions agreeing with the importance of designing sites to respond to climate change being very similar across all areas. The location with the highest level of agreement with the statement was outside the borough, in London Colney/Colney Heath.



**Q13. I would support new development in my area if new local facilities are delivered alongside it**

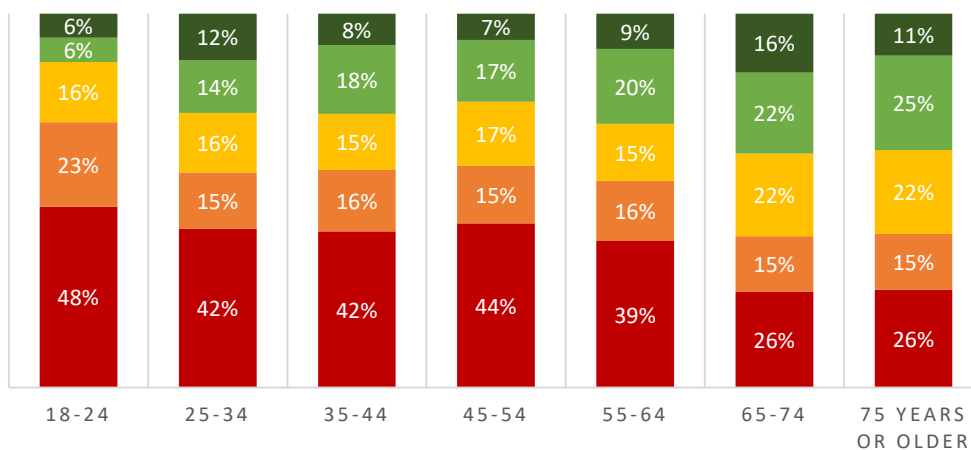
- 5.21 Throughout the preparation of the Local Plan to date, residents have highlighted the pressure on local facilities arising from more development as a key concern. Consequently, the draft Local Plan has sought to ensure that new growth is accompanied by supporting infrastructure. However, responses to this question, suggest that less than 30% of respondents would support new development if new local facilities accompanied it. This may be due to the overall lack of support for any significant level of growth, concern over impact on local facilities or simply because there is a perception that new local facilities will be located in areas to serve new development, rather than existing communities and any existing infrastructure deficit.
- 5.22 The proportion of respondents disagreeing with this statement, very clearly increased by age group with almost twice as many people between 18 24 year olds disagreeing with this statement as those over 65. This would appear to reflect the trends observed with the Hertsmere Works question regarding local infrastructure and services investment, the importance of which clearly increased as the community ages. It is also likely that younger age groups rely less on physical services nearby relying more on internet and remote access to facilities.
- 5.23 An assessment of the responses by geographical area demonstrated a degree of consistency across locations with the exception of Bushey where there was an even greater proportion of people not supporting new development if new facilities accompanied it. This reflects the level of opposition to development in Bushey, although it is somewhat inconsistent with the views expressed by individual residents who, in objecting to development, often cited the pressure on local infrastructure arising from new development.

## Q13. ALL RESPONSES



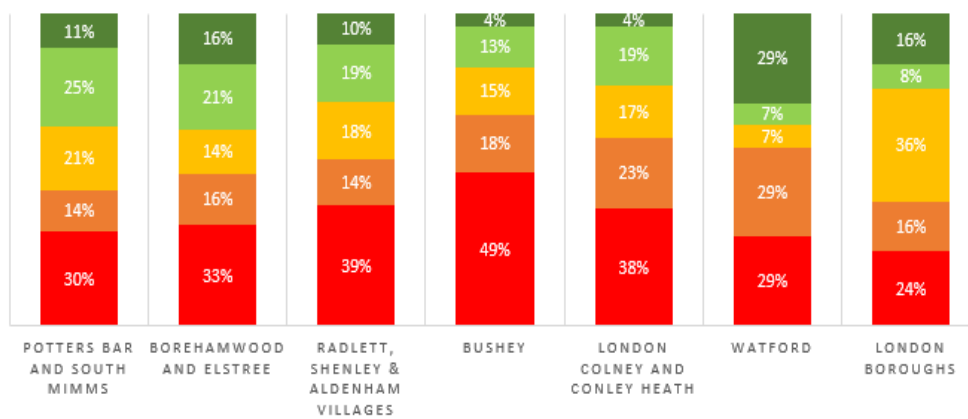
## Q13. BY AGE GROUP

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## Q13. BY AREA

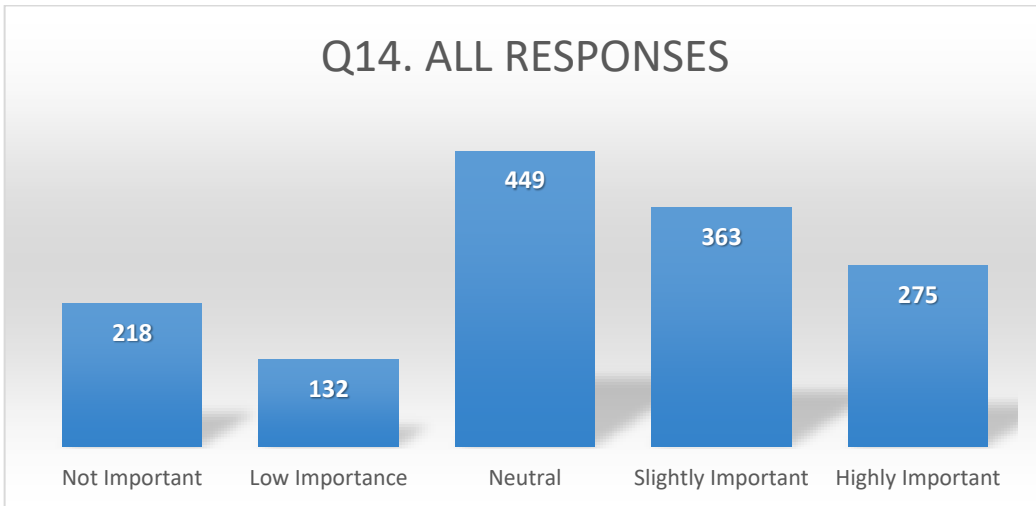
■ Strongly Disagree ■ Disagree ■ Neutral ■ Agree ■ Strongly Agree



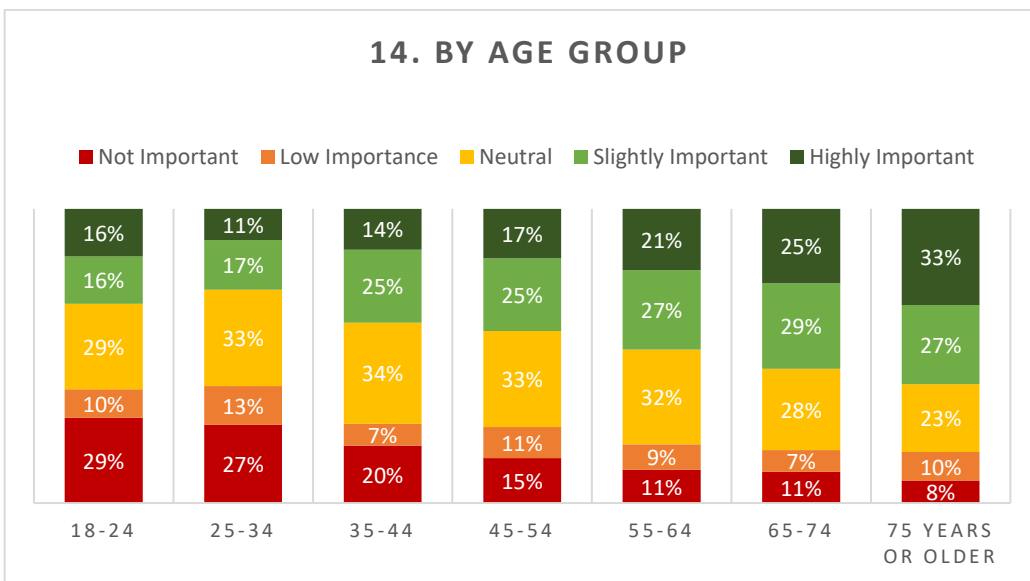
**Q14. Rate how important it is to develop the creative industries in Hertsmere.**

- 5.24 Although creative industries and, in particular the film and TV industry, form a key part of the local economy, only 43% of respondents considered it to be slightly or highly important with a relatively large proportion being neutral on the subject. The proportion attaching importance to the creative industries being important increased by age group with the proportion of over 75's regarding the sector as highly important being over twice as many as those under 45.
- 5.25 The area with the highest proportion regarding the industry as important was in Borehamwood and Elstree, reflecting its location as a nationally important centre for film and TV production. The proportion sharing this view decreased, in particular, outside of the borough which reflects how Hertsmere residents associate their own borough more strongly with the creative industries.

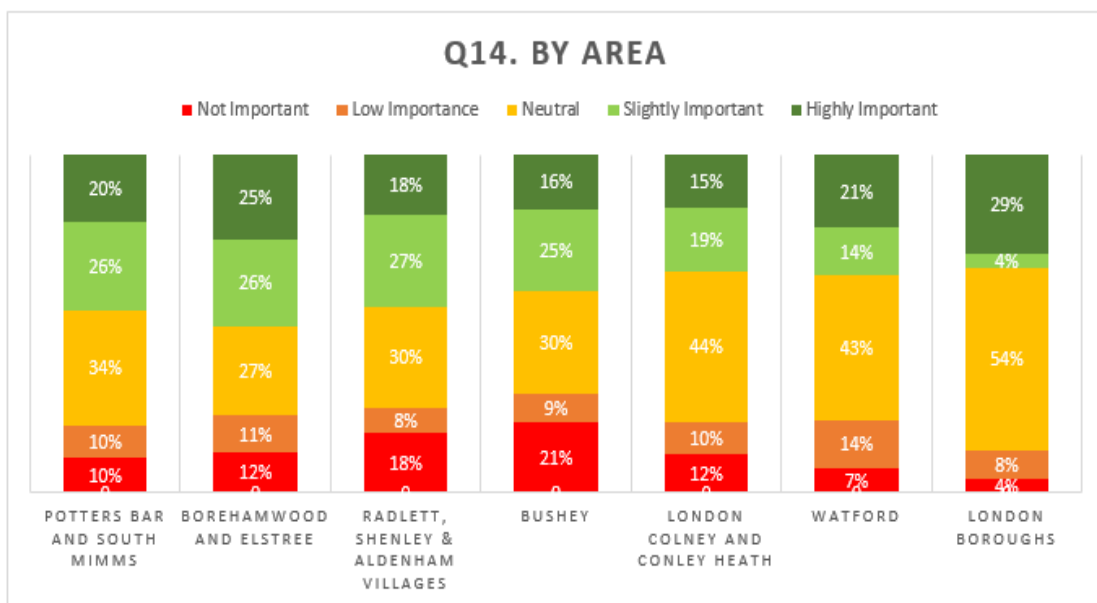
## Q14. ALL RESPONSES



## 14. BY AGE GROUP



## Q14. BY AREA

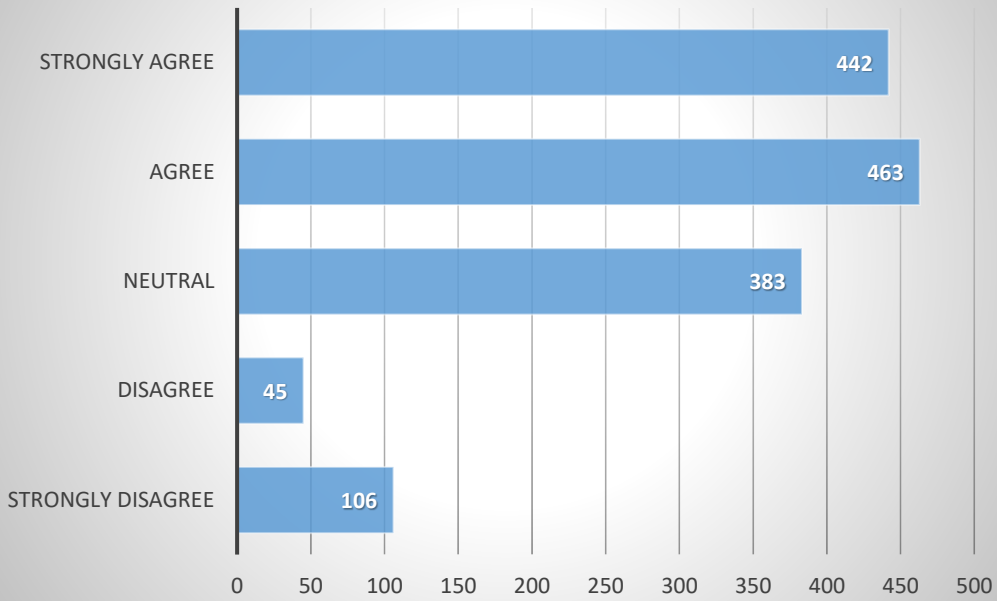




**Q15. Hertsmere should promote apprenticeships for local people in creative industries**

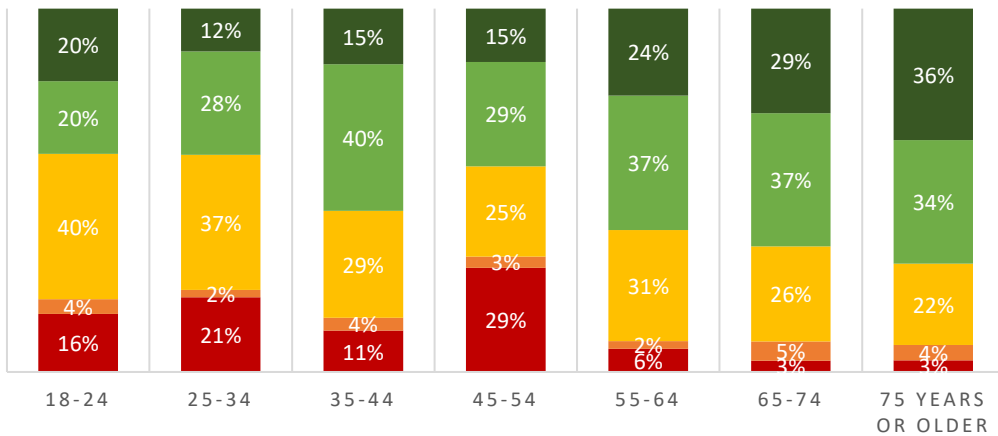
- 5.26 The response to this question largely reflected the answers to the previous question around the development of creative industries. However, in terms of local apprenticeships, there was a higher proportion of people who agreed with the statement albeit, once more, with a large proportion of neutral responses. A significantly higher proportion of people within the older age groups (55+) agreed with the statement. It is unclear why the younger groups attached less importance to the need for local apprenticeships. However, there may be a 'generational' aspect to how different age groups see apprenticeships, given their relative decline over several decades as a form of training prior to the establishment of the National Apprenticeship Service in 2009 and/or doubts about the prospect of a job at the end of an apprenticeship.
- 5.27 Once again, by area, the highest proportion of those agreeing with the question, were from the Borehamwood and Elstree area, reflecting the locality's continued links with the film and television industry.

### Q15. ALL RESPONSES



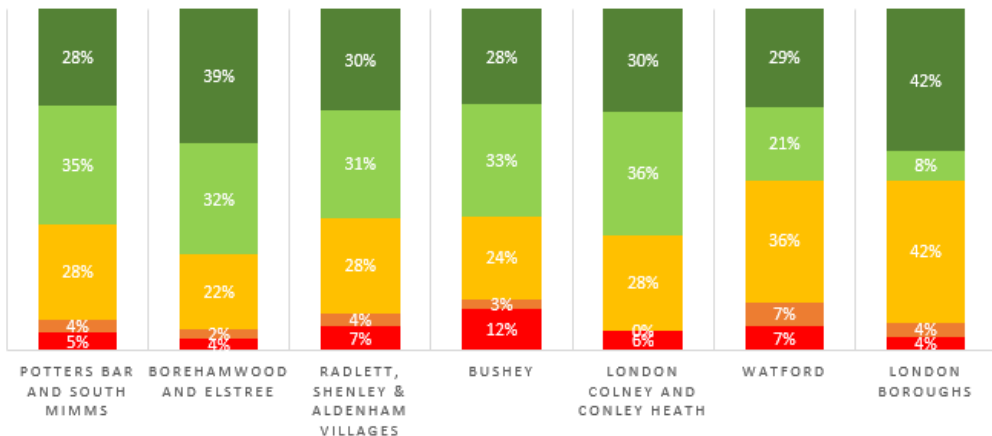
### Q15. BY AGE GROUP

■ Strongly Disagree 
 ■ Disagree 
 ■ Neutral 
 ■ Agree 
 ■ Strongly Agree



### Q15. BY AREA

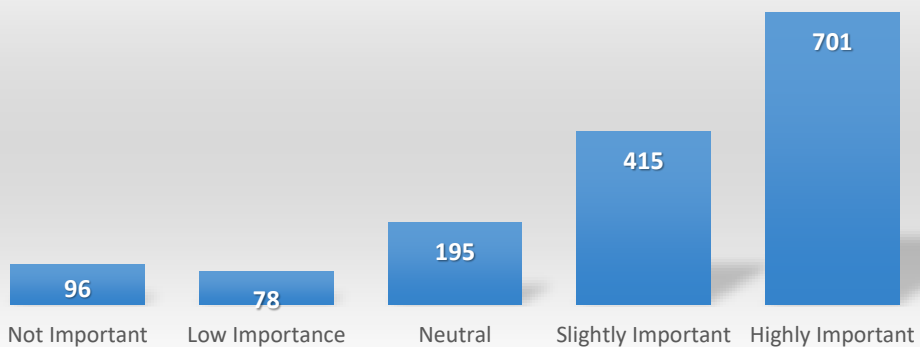
■ Strongly Disagree 
 ■ Disagree 
 ■ Neutral 
 ■ Agree 
 ■ Strongly Agree



**Q16. Rate how important it is to have local services within walking distance.**

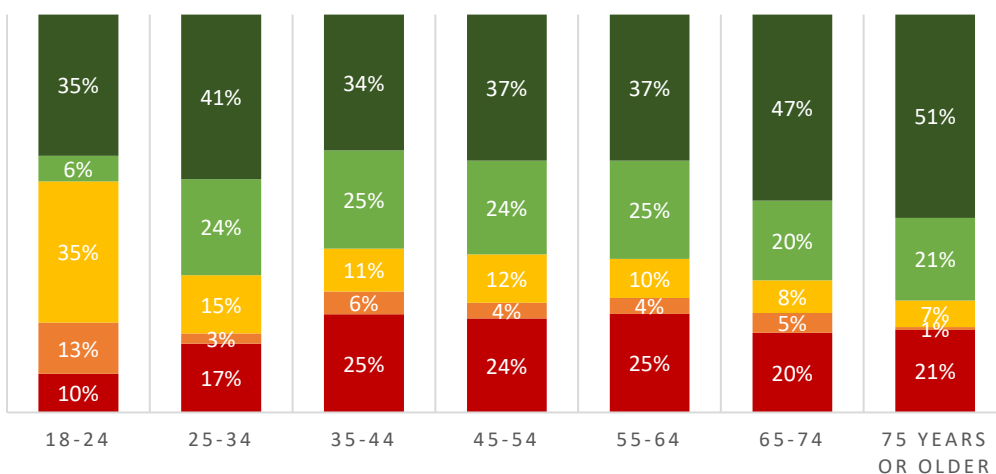
- 5.28 75% of respondents regarded proximity to local services as important or highly important with a higher proportion of older age groups typically sharing this view. However, with the exception of 18-24 year olds (a small sample), well over 50% of individuals in each age group considered it important to have local services within walking distances. It is possible that the pandemic, which resulted in so many people having to work and shop locally due to the restrictions, influenced the responses to the question; it also reflects the key principles of sustainable planning and transport which are set out in key policy documents such as the NPPF and Hertfordshire County Council's Local Transport Plan (LTP4).
- 5.29 By area, the responses were relatively similar although Potters Bar was the only location where over 80% of respondents considered it to be important or highly important to have local services within walking distance. This may, in part, be due to the fact that the town has two high streets enabling more of the population to access more services on foot in comparison to other settlements in the area.

## Q.16 ALL RESPONSES



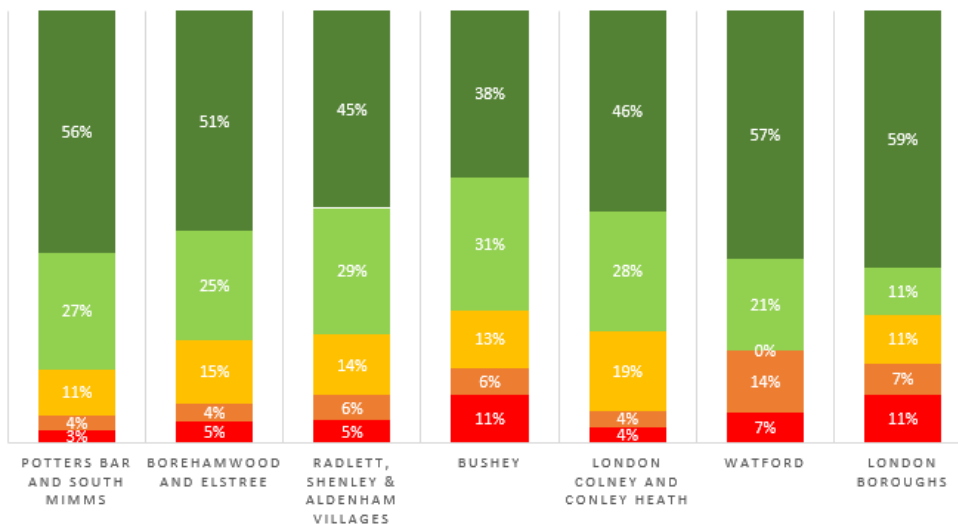
## Q16. BY AGE GROUP

Strongly Disagree Disagree Neutral Agree Strongly Agree



## Q16. BY AREA

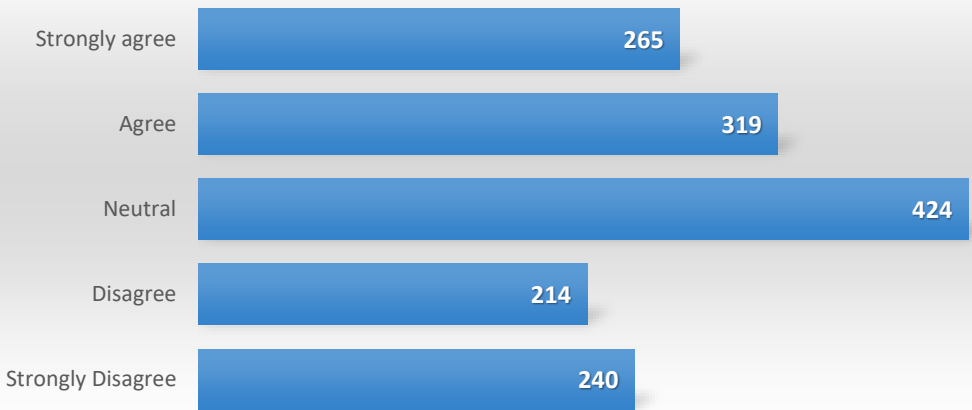
Not Important Low Importance Neutral Important Highly Important



**Q17. The pandemic has permanently changed my work habits.**

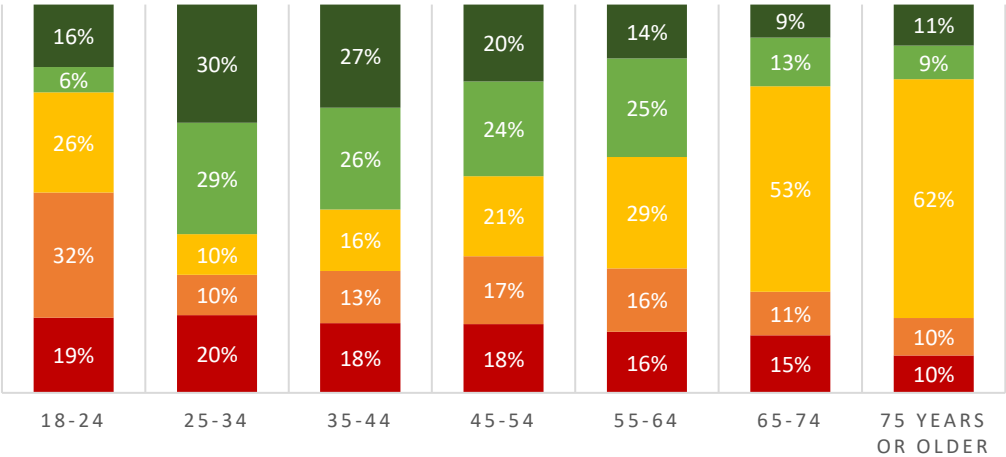
- 5.30 Despite the fact that the Covid pandemic has dominated so much of everyday life for over two years, including work patterns, the number of respondents who agreed with this question was only slightly higher than the number who disagreed. In fact, with the largest proportion of respondents being neutral (29%), many people may simply not yet know whether their work patterns have permanently changed. The two age groups with the largest proportion of those agreeing with the statement were 25-34 and 35-44 year olds, suggesting this demographic is more likely to embrace new ways of 'agile' working.
- 5.31 There was no significant variation by area in response to this question and it is likely to be some time before we can understand the extent to which the pandemic has impacted on both work habits and – importantly for the Local Plan – the demand for office floorspace, in particular. A number of responses to the Local Plan suggested that, in reducing the demand for office accommodation, the pandemic has created more opportunities to utilise these sites for housing development.

# Q17. ALL RESPONSES

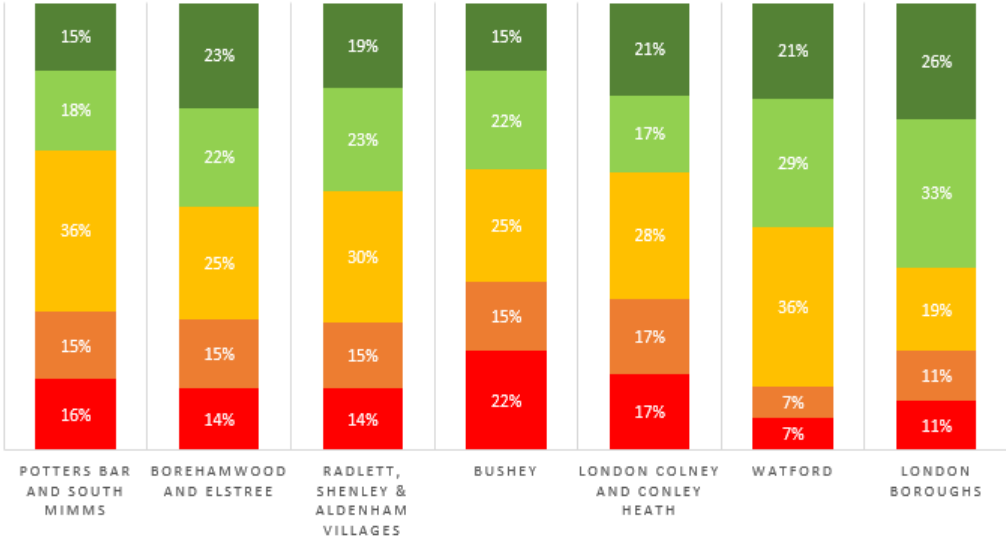


# Q17. BY AGE GROUP

Strongly Disagree Disagree Neutral Agree Strongly Agree



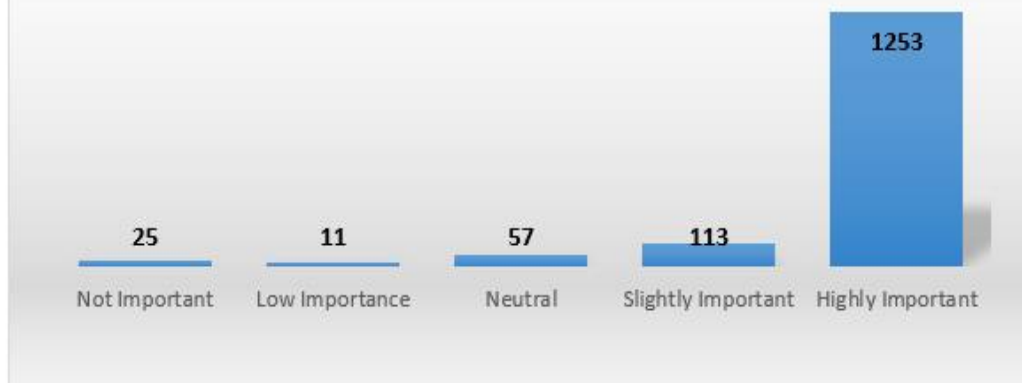
# Q17. BY AREA



**Q18. Rate how important maintaining the look and feel of your area is to you.**

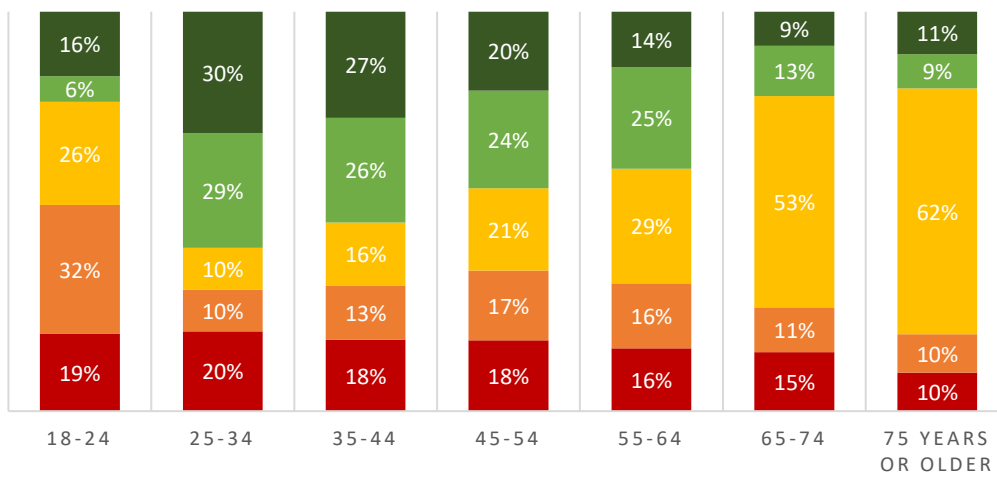
- 5.32 This question generated the highest level of consensus with over 90% of respondents considering that maintaining the look and feel of their local area as being important – the vast majority agreeing that it was highly important. Only 2% of people replying considered that this was not important.
- 5.33 The proportion of respondents, who regarded maintaining the look and feel of their area as important clearly reduced by age; the proportion of those with a neutral view increased with age, particularly amongst those over 65 year olds but it is not clear what factors might have shaped the patterns seen in the response to this question. There was some modest variation by area, with a larger proportion of those responding from Bushey regarding it as a highly important to maintain the look and feel of their area (92%) compared to Borehamwood and Elstree (76%). By comparison, only 68% of those responding from the London Boroughs considered it to be highly important.

## Q18. ALL RESPONSES



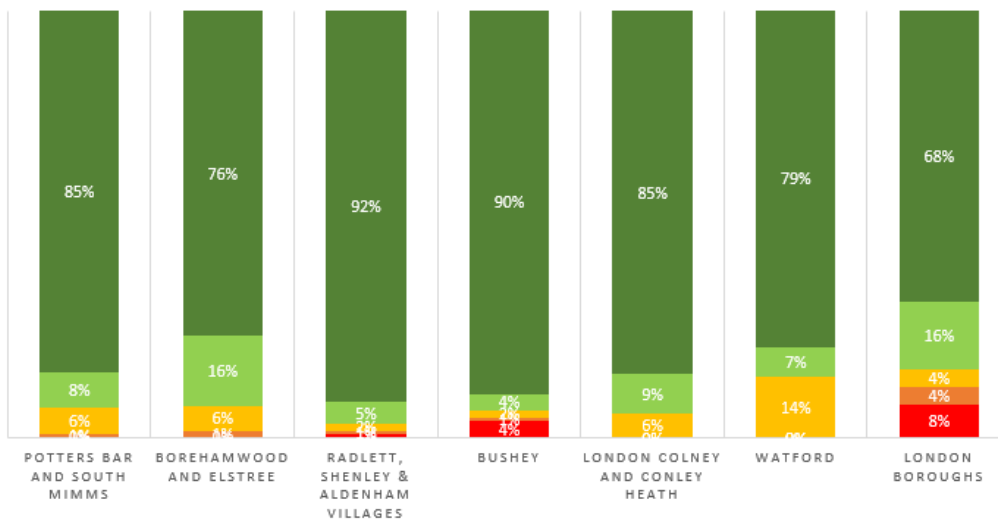
## Q18. BY AGE GROUP

■ Strongly Disagree 
 ■ Disagree 
 ■ Neutral 
 ■ Agree 
 ■ Strongly Agree



## Q18. BY AREA

■ Not Important 
 ■ Low Importance 
 ■ Neutral 
 ■ Important 
 ■ Highly Important

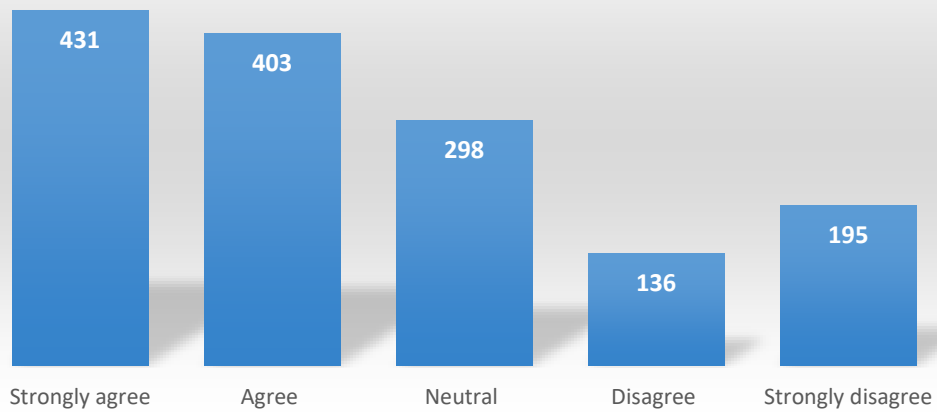




**Q19. I would be more likely to support growth that is well-designed and beautiful**

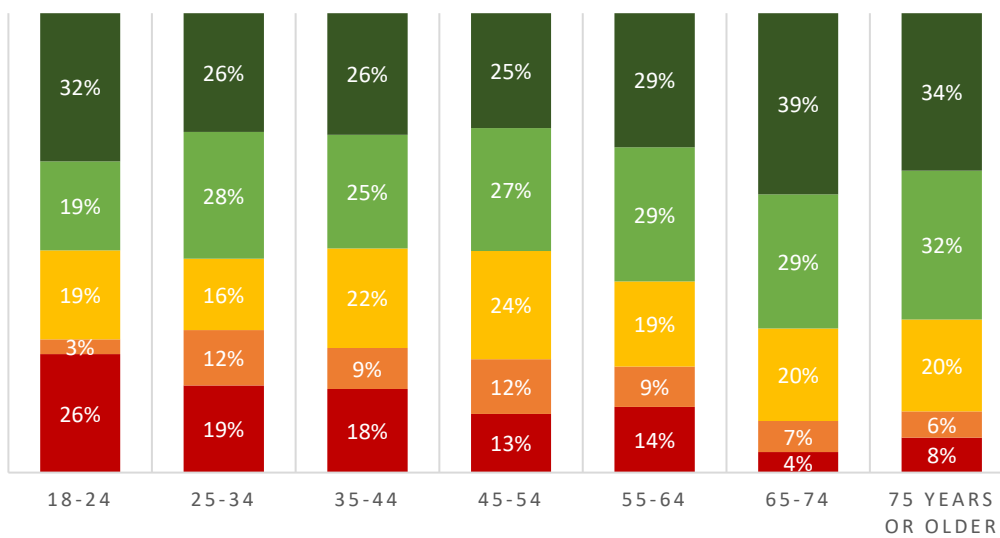
- 5.34 A majority of those responding to this question, agreed on the importance of growth being well-designed and beautiful – the term ‘beautiful’ being used in the question because it has been specifically emphasised in the NPPF as needing to be the heart of sustainable planning. However, the fact that over 40% were either neutral or disagreed with this question, reflects how subjective the subject of design and beauty can be. The proportion of people who strongly agreed with the statement increased by age group with those over 65 year olds, in particular, considering it to be highly important. Almost 50% of those under 54, were either neutral or in disagreement to this question.
- 5.35 Within the borough, there was some modest variation by area with Bushey being the only location where less than 50% considered well-designed and beautiful growth to be important or highly important. This may be a consequence of the overall level of objection to growth in the Bushey area, rather than reflecting the views of the community on an individual development, per se, although there was considerable opposition to the levels of growth in the draft plan across all parts of the borough.

## Q19. ALL RESPONSES



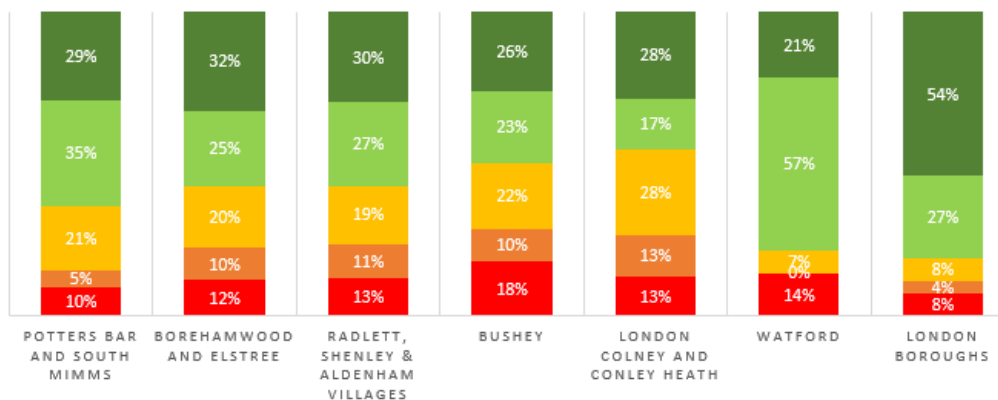
## Q19. BY AGE GROUP

■ Strongly Disagree 
 ■ Disagree 
 ■ Neutral 
 ■ Agree 
 ■ Strongly Agree



## Q19. BY AREA

■ Strongly Disagree 
 ■ Disagree 
 ■ Neutral 
 ■ Agree 
 ■ Strongly Agree



### Additional comments provided in survey responses

5.36 The majority of those completing the survey also provided additional comments on the plan. The comments received reflected those expressed in responses submitted individually to the Local Plan by email or post and were overwhelmingly against the level of growth in the plan, the loss of Green Belt and/or the impact on the local area and services.

5.37 Many of the comments highlighted concerns, often expressed robustly, about the loss of Green Belt and impact on general localities. For example:

*“As a council you MUST LISTEN. People do NOT WANT you to build on greenbelt.”*

*“Shenley is ment [sic] to be a village NOT a city. To [sic] many homes will cause more cars, traffic and unnecessary stress to residents. Congestion will be awful as its bad as it is. Parking will be atrocious, many older residents will be petrified to go out with even more people around. It will cause alot of mental health issues with the residents who already live here and lived here their whole lives.”*

*“I think its a joke to propose building so many homes on Green Belt, there have been so many empty homes in the area that could be for affordable and so many over developed sites that just make the developers richer. The greenbelt and wild life is really important”*

*“If you go on to build over this greenbelt land, you will completely destroy places that people love to spend time in, wether [sic] this is going for a walk, having a picnic or making memories with friends and family, you will take that away from hundreds of people...You won't be happy until you've milked as much land as you possibly can to make as much money as you possibly can.”*

5.38 Many of the comments objected to specific, strategic sites including PB2 (former Potters Bar golf club), PB3 (South of Potters Bar), B1 (Harts Farm, Bushey), B2 (Compass Park, Bushey), R1 (North of Watford Road, Radlett) and BE3 (East of Cowley Hill, Borehamwood), as well as the proposed Bowmans Cross new settlement.

A limited number of objections were also made in respect of site B4 (Land south of Elstree Road, Bushey) but this strategic site attracted relatively few comments, as was the case with individually submitted responses, when compared to other sites. Relatively few comments were also received in relation to Site B3 (former Bushey Golf and Country Club). It should also be noted that there were very few comments received in relation to Site B5, Elstree Way Corridor.

5.39 No specific comments were made in relation to employment sites, with the exception of the proposed Media Quarter, to which a number of objections were made citing loss of Green Belt, environmental impact and a view that there would be few permanent local jobs created. In addition, a comment was submitted on behalf of Elstree Screen Academy (who also submitted an individual response) questioning the demand, funding and government support for the proposed specialist media college within the Media Quarter.

5.40 The majority of site-specific comments related to the strategic housing sites in the draft plan but some smaller sites were also highlighted. Those which were specifically referenced and objected to were: HEL375 (Manor Road), HEL390 (Land adjacent to Harris Lane, Shenley), HEL180 (Kemprow), HEL345 (Aldenham Glebe) and HEL177 (Dove Lane). A number of responses were received supporting the inclusion of HEL369 Well End Lodge. It should also

be noted that some of the survey responses simply listed all sites in the draft plan and objected to them using the same form of words which were used in the template responses, stating:

*"I object to building on the greenbelt in ANY location in Hertsmere and on ALL sites named in this Draft Plan (in no particular order) namely BE1, BE3, BE5, BE6, HEL152, HEL197, HEL218, HEL369, HEL388, HEL601, HEL212, HEL274, HEL175, B3, B2, B1, HEL235, HEL337b, HEL337c, B4, HEL386, HEL502, HEL505, HEL521, PB2, PB3, HEL162, HEL177, HEL216, HEL318, HEL375, R1, R3, HEL214, HEL220, HEL222, HEL231, HEL348/349, HEL390, HEL228a, HEL228b, HEL320, HEL385c, NS1, HEL345, HEL179, HEL 180, HEL199, HEL219/252, HEL509, Media Quarter"*

- 5.41 Some of the responses were more nuanced, acknowledging that there was a need for more housing, but not supporting the overall level of growth. One of several examples of this approach included the following from a resident in Radlett:

*"I accept that a certain amount of further expansion of the developed land area is inevitable and can see that considerable efforts have been taken to propose the least undesirable way of satisfying new housing targets. However, I do not think the plan sufficiently justifies the scale of expansion that is proposed. Just blaming the need for more homes on broad macro national requirements and government targets is not really good enough and the plan should also explain to residents why these are the right targets for Hertsmere."*

- 5.42 Other comments focused on specific local infrastructure issues and whilst supporting aspects of the plan, questioned whether these facilities would be delivered. One resident from Borehamwood specifically stated:

*"The plan seems to offer what is required taking into consideration the various needs and criteria such as infrastructure, climate change, local environment, services, etc. HOWEVER, will these actually be included in the final delivery or building projects. Previously new medical centres were promised with new housing developments, but in the end these were dropped but the new houses were still built, putting increased demand on already stretched medical facilities."*

- 5.43 Although it is the responsibility of the Clinical Commissioning Group to bring forward medical facilities, another response from a Borehamwood resident was critical of the Council for not delivering health facilities in the Elstree Way Corridor

*"I think it is I'll [sic] thought out, and can see no provision for additional NHS Services. HBC failed to deliver NHS Services in the Elstree Way Corridor development and residents have NO assurance that HBC will deliver needed infrastructure this time."*

- 5.44 Notwithstanding the volume of objections to growth, there were also some responses supporting or commending the plan. One Potters Bar response stated:

*"...I think Hertsmere have done an excellent job...We all have to take the load - Hertsmere is in danger of becoming an OAP enclave- youngsters have nowhere to live."*

- 5.45 Other more positively worded responses included:

*"I think it's brilliant, though I share concerns of other residents around infrastructure impacts - particularly public transport, increased traffic, and access to services like*

*GPs and dentists. I would love to see more affordable housing though so I fully support this plan.” (Borehamwood resident)*

*“It appears that a lot of thought and work has gone into drafting this plan. I appreciate the council's dilemma as it is squeezed between central government requirements and the perfectly understandable NIMBY reaction of local populations...As a Radlett resident I cannot support everything in this plan but would back a plan which respected Green Belt rules and gave prominence to affordable homes and adequate infrastructure.”*

*“I congratulate all concerned with production of the highly impressive and comprehensive draft Local Plan.” (Radlett resident)*

## 6 Responses to the draft local plan

6.1 In addition to the digital survey and template responses, a wide range of individual responses were submitted by the general public and by organisations across a range of categories:

- Statutory bodies
- National Interest Groups
- Local Interest and Campaign Groups
- Residents Associations
- Developers and site promoters
- Businesses

6.2 The draft Local Plan is structured thematically with each section focussing on a different area of land use planning such as the overall vision, spatial strategy, housing, employment, climate change, transport and so on. The largest proportion of responses focussed on the scale of growth (particularly housing), development of individual sites and the loss of Green Belt but were not necessarily presented in a way which followed the order of the draft plan. To assist in the analysis of the responses, officers have attributed comments to individual parts of the plan and in particular, individual policies and allocations, wherever possible. This included logging comments to a particular 'consultation point' in the Council's online consultation portal, where individual submissions have been emailed and posted to the Council and have subsequently been uploaded. The portal allows for all comments received to be viewed online and in assigning comments to a particular part of the local plan, the public and other stakeholders will be able to more easily view responses about a particular site or policy in the draft plan.

6.3 It should be noted that a number of responses were initially submitted directly into the portal by the general public against the Foreword (by the Leader of the Council and Portfolio Holder for Planning) and Introduction at the beginning of the plan. These sections contained no policies and did not set out the strategy or objectives for the plan. However, the responses submitted against the Foreword and Introduction covered the same issues as those comments made in relation to other parts of the draft plan and they are therefore covered in the analysis against the substantive sections below.

### **Local Plan Vision and Strategic Objectives**

6.4 Statutory bodies and developers who responded to this section mainly supported the vision and strategic objectives. However, Council for the Protection of Rural England (CPRE) specifically argued that the Local Plan vision and key themes did not include the fundamental importance of the current extent of the Green Belt in protecting the countryside and maintaining the historic settlement pattern for future generations.

6.5 The majority of comments in relation to this section of the plan were made by residents. Apart from commenting on the quantum of development envisaged, residents did not express a significant level of objection to the actual wording of vision and strategic objectives. However, a consistent theme was that the plan would not achieve the vision and objectives. Residents considered that growth was being pursued at the expense of the environment, farmland, character, access to countryside, biodiversity, ability of infrastructure to cope, traffic, pollution, amenity and recreation open space, climate change including carbon sequestration and quality of life and well-being.

- 6.6 Calls were made by many residents for a re-assessment of housing targets, arguing that the household projections on which are based were out of date and building on Green Belt would be contrary to government policy and public opinion. A number of responses specifically referenced a speech made by the Prime Minister to the Conservative Party Conference on 6<sup>th</sup> October 2021 stating housing would not be built on greenfield sites.
- 6.7 Residents stated that the delivery of this level of growth would be contrary to the Green and Distinctive Hertsmere vision statements and objectives 10 (living within easy reach of open space); 18 (protecting the Green Belt); and 19 (retaining and reflecting local settlement character); in particular. Extending existing settlements as envisaged by the Hertsmere Homes vision statement would increase the distance from countryside for many existing residents. A number of the responses clearly wanted to see the protection of Green Belt as a (stronger) strategic objective and felt that building on the Green Belt would only benefit developers, not the future of Hertsmere, emphasising the focus should be on brownfield sites. Although some of the green belt-related observations were clearly related to the nationally stated purposes of the green belt (e.g., preventing coalescence of settlements, urban sprawl), many comments were focussed on the recreational, amenity and mental health value of areas of green space.
- 6.8 Some residents' responses also argued that growth would be incompatible with sustainability as it would involve more resources, pollution and waste, and that the plan's response to climate change was insufficient. The plan was also criticised for its inability to control infrastructure provision - thus calling into question the Future and Connected Hertsmere vision statements.

**Local Plan Vision and Strategic Objectives: Summary of responses from statutory bodies, other organisations and development industry**

Organisation	Site promoted	Key point(s) made
AEW Europe (site promoter)	The Point, Borehamwood	Strongly support vision and objectives
CPRE	n/a	Building on the Green Belt undermines the vision and objectives and it is not possible to achieve proposed development without negative impact on biodiversity and landscape. Objective 6 (Bowmans Cross) should be deleted as it is unnecessary, unjustified and harmful. Objective 12 (climate change) provisions are inadequate Objective 18 (protection of the Green Belt) is inadequate and the plan fails to achieve even that objective by proposing very significant development within the Green Belt.
Dacorum Borough Council	n/a	Support vision and objectives
Environment Agency	n/a	Implementing flood risk solutions will help achieve the plan's other aims and ambitions;
Hertfordshire County Council (Growth and Infrastructure)	n/a	Support public health ambitions being central to strategic objectives. Plan should refer to local public health data to ensure current accurate evidence is used. Welcome vision and objectives which are in line with LTP4. Expect transport policies to be modified based on outcome of current settlement based transport work
LB Enfield	n/a	General support but plan should quote borough rather than local needs were consistent with national policy.

Organisation	Site promoted	Key point(s) made
Sport England	n/a	Support, especially Green, Healthy, and Connected Hertsmere themes as they support opportunities for sport and physical activity and encourage active and healthy lifestyles
Urban & Civic (site promoter)	NS1 Bowmans Cross	Support vision and objectives

### Spatial Strategy

- 6.9 Whilst most statutory bodies and other organisations responding were largely supportive of the strategy, many residents expressed concern over the quantum of development being proposed (both overall and in specific settlements), disagreed with the principle of development in the Green Belt and stressed the need to maximise use of brownfield opportunities.
- 6.10 Responses indicated that the government's standard methodology was a starting point and Hertsmere's target should be reduced as a result of local constraints, such as Green Belt. Conversely, some developers argued that the housing requirement should be higher. Some residents felt that the quantum of development would not retain the unique and separate identity and character of Hertsmere's settlements nor adequately protect existing residents, and the balance of allocations between settlements was criticised (usually seeking fewer in the objector's own settlement). It was argued that building on the Green Belt was contrary to government policy and raised issues with regard to sustainability - specific mention was made of traffic, congestion, pollution, health and well-being, impact on infrastructure and services, wildlife, lack of public transport, climate change/carbon emissions and ecology/biodiversity.
- 6.11 It was argued that the strategy underestimated the opportunities for development in urban locations and likely windfall housing numbers which, if taken into account, would reduce the need for Green Belt allocations. CPRE, in particular, indicated that the scale of Green Belt loss means that the plan's aim to safeguard and enhance the Green Belt and protect and enhance biodiversity would be unachievable. The CPRE argued that exceptional circumstances had not been demonstrated and so the Green Belt allocations should be omitted from the plan.
- 6.12 Several people also criticised an 'over-reliance' on large sites which were unsustainable but may also not come forward; site promoters of some smaller non-allocated sites in the Green Belt challenged housing delivery rate assumptions and set out arguments for their particular 'smaller' sites to be allocated in addition to those already allocated. Additional information was requested: the outcome of the sustainable transport study, details of compensatory Green Belt improvements and that the key diagram should show all sites, not just strategic ones.



**Spatial Strategy: Summary of responses from statutory bodies, other organisations and development industry**

<b>Organisation</b>	<b>Site promoted</b>	<b>Key point(s) made</b>
AEW Europe (site promoter)	The Point, Borehamwood	Support spatial strategy
Aldenham PC	As landowner also promoting HEL386 Gravel allotments, Heathbourne Road, Bushey Heath HEL219/252 Pegmire Lane Patchetts Green	Site selection process flawed - should allocate more brownfield sites. Include Aldenham Reservoir in plan
Barhale Plc (site promoter)	Tarmac Land south of M25 HEL159a and north of Bell Lane/Salisbury Hall HEL159b	Support infrastructure approach but should recognise that opportunities to maximise sustainable transport solutions vary between urban and rural locations
Barratt David Wilson Homes (site promoter)	BE6 Land north of Barnet Lane, Borehamwood	Commend the Council on seeking to deliver a growth strategy that is ambitious and seeks to meet both the housing and employment needs of the borough in their entirety.
King and Co (site promoter)	HEL375, Manor Road, Potters Bar, HEL255/HEL254 Blanche Lane, South Mimms HEL341, Allum Lane	Note statements to identify the character and function of key settlements including reference to Bowmans Cross. This is an ambition statement regarding settlement function at the end of the Plan period.
Redrow Homes (site promoter)	B1 Harts Farm, Bushey	Support the key diagram.
Fairfax Properties (site promoter)	R3 Land South East of Shenley Hill, Radlett	Support settlement hierarchy and Radlett's place in it.
Council for the Protection of Rural England (CPRE)	n/a	Should not just accept standard method figure as target - apply local constraints/planning judgement; climate change considerations inadequate, carbon emissions is not listed as a priority consideration; windfall assumptions are too low; need to define exceptional circumstances for Green Belt release; should omit Green Belt sites from plan, including Bowmans Cross, and focus on opportunities in urban area; use Article 4 Directions sparingly as an opportunity for conversion to residential reduces demands on Green Belt
Cala Homes (site promoter)	S1 Shenley Grange	Shenley community hub should be identified as required infrastructure
Crown Estate (site promoter)	R1 Land north of Watford Road, Radlett	Support the strategy and its application to Radlett
Gilston Investments (owners of Wrotham Park Estate) (site promoter)	BE3 Land east of Cowley Hill, PB3 Land south of Potters Bar	Support the spatial aims of the plan.
Hertfordshire County Council (Growth and Infrastructure)	n/a	Borehamwood and Potters Bar stations nearing end of useful lives; opportunities for re-provision being investigated. In relation to Bowmans Cross, policies should ensure needs arising are met sustainably

Organisation	Site promoted	Key point(s) made
Hertfordshire County Council (Property) (site promoter)	Various including HEL385c, Popes Farm, HEL274 Edgwarebury House Farm, HEL318 Former Sunnybank Primary School	Support spatial strategy
LB Enfield	n/a	Support infrastructure led development.
Mr and Mrs R Monk (site promoter)	HEL196 Land Adj to Wilton End Cottage, Shenley	Support spatial strategy but object to over-reliance on large sites.
Nolan Brothers Property Ltd (site promoter)	HEL208	Plan fails to identify level of employment demand and allocate sufficient sites.
Oxhey Lane Developments Ltd (site promoter)	HEL357, Oxhey Lane	The housing target should be higher; there is an over-reliance on large sites in the plan.
Taylor Wimpey (site promoter)	HEL511, Woodcock Hill, Borehamwood	Increase the quantum of development for Borehamwood/Elstree and Elstree village and reduce the amount of development proposed for Bowmans Cross
Three Rivers District Council	n/a	Support prioritisation of brownfield sites, density uplift, provision of on-site infrastructure; request to be kept updated on secondary provision in Bushey area; Local Plan should allocate playing field for Carpenders Park school.
St Albans City and District Council	n/a	May be able to assist with meeting employment land needs but cannot assist with housing land.
Three Rivers District Council	n/a	Support Local Plan progress. Request allocation of playing fields for Carpenders Park proposed new school.
Veladail Leisure Ltd (site promoter)	Bushey Hall Golf Club and	The housing target should be higher; there is an over-reliance on large sites in the plan.
Welwyn Hatfield Borough Council	n/a	Implications for Welwyn Hatfield of HBC proposals, including increased traffic on A414 and A1M. Need to be considered through continued cooperation between the two LPAs; HBC should have particular regard to implications of WHBC Local Plan proposals to south of borough.

### Individual Place Strategies

- 6.13 Each of the larger villages and urban settlements across Hertsmere (and Bowmans Cross) had its own place strategy and objectives but there were relatively few comments specifically referencing these. Some of the responses on the amount of growth proposed for a particular settlement rather than the wording of the place strategy itself.
- 6.14 A limited number of developers and landowners supported the place strategies cross-referencing it to the role their site would make to deliver the local objectives set out in the draft plan. Specific objections or comments were also made in relation to some of the listed objectives for individual locations with suggested alternative wording, for example, provided in the case of Bowmans Cross and South Mimms.
- 6.15 Concerns were expressed by two site promoters in Shenley in relation to the infrastructure requirements not being adequately reflected in the Shenley Place Strategy. Dacorum BC also

sought greater reference to retail needs and the vitality of the high street across all areas, as well as suggesting/ that the smaller rural settlements should have their own place strategy.

- 6.16 Although many of the residents who responded directly through the consultation portal submitted comments against individual place strategies, there were very few specific comments on the individual place strategies and objectives themselves. Comments from residents against this section of the plan tended to be the same as those expressed by residents against other parts of the plan in so far as they objected to the scale of growth, the development of specific sites, the loss of Green Belt and impact on local character, environment and infrastructure.
- 6.17 Responses were made in relation to locations across the borough and were not limited to or focussed on a particular settlement. However, specific comments were made, for example, in relation to secondary education provision in Radlett and Bushey or the impact on conservation areas in Potters Bar from development of PB2 and PB3. Existing traffic congestion was also highlighted in a number of locations including, for example, the junction of Furzehill Road and Barnet Lane (in relation to BE6) and the junctions of Little Bushey Lane with Aldenham Road and Sandy Lane (in relation to B1 or B2). Local flooding and drainage issues were also highlighted by many residents, particularly in relation to development in Potters Bar and Bushey. In Radlett and Shenley, a number of the responses received highlighted the need for the plan to align with the the made Neighbourhood Plans for those areas. Comments in relation to Bowmans Cross were made against both the place strategy and the allocation in Policy H10; the issues raised by the general public and other stakeholders specifically in relation to individual sites are covered separately in this report.

**Place Strategies: Responses from statutory bodies, other organisations and development industry**

Organisation	Site promoted	Key point(s) made
AEW Europe (site promoter)	The Point, Borehamwood	Support the general strategies and principles, but further emphasis should be put on prioritising the use of brownfield land.
Aldenham Parish Council	As landowner also promoting HEL386 Gravel allotments, Heathbourne Road, Bushey Heath HEL219/252 Pegmire Lane Patchetts Green	Level of housing growth is neither justified by local need nor capable of being adequately services by the current road network and infrastructure. R1 and R3 in particular would not meet the needs of the Parish.  Stronger policies should be in place to delivery key aspirations of the Radlett Neighbourhood Plan.
Barratt David Wilson Homes (site promoter)	BE6 Land north of Barnet Lane, Borehamwood	Specifically support Objectives 1, 6, 8 and 11 for Borehamwood given ability of Site BE6 to deliver on these.
Bushey and District Footpaths Association	n/a	Objections and specific footpath-related comments in relation to B1, B2 and B4. In relation to B3 (Former Bushey Golf and Country Club), although there are no public footpaths, since the golf course closed, residents have used the space to enjoy walking and there is an opportunity now to improve the footpath network for residents. The proposed development would prevent this.
Bushey Forum	n/a	Current version of the plan will devastate Green Belt aspect of Bushey and negatively impact on environment and wildlife.

Organisation	Site promoted	Key point(s) made
		Council should be using more recent and lower population estimates particularly because of Brexit and Covid. Acknowledge there are good bus links to Watford and other parts of the Borough but travel inside Bushey requires more than one bus.
Cala Homes (site promoter)	Shenley Grange	Place Strategy for Shenley lists a number of local objectives but excludes the provision of a new community hub in the village.
Comer Homes (site promoter)	Rectory Farm, Shenley	Concern that place strategy for Shenley does not adequately address timely delivery of infrastructure
Crown Estate (site promoter)	R1, Land north of Watford Road	Local Objectives are supported and have shaped the proposed Settlement Strategy. Proposed allocation of Site R1 Land north of Watford Road is welcomed to help meet these objectives.
Dacorum BC	n/a	<p>Little reference made to retail needs and sites identified to address this. More could be done in the place strategies to ensure the vitality of the high street is addressed.</p> <p>Presenting the distribution of employment needs across the borough in this section would complement the other requirements</p>
Mr M Homan (site promoter)	HEL231 Starveacres, Radlett	Support the objectives listed for Radlett. The site can contribute to the objectives identified in the draft local plan, particularly a direct contribution to housing needs and indirectly (financially) to the remaining objectives.
Heath-ways Residents Association	n/a	Acknowledgement of need for new houses need to be built in Potters Bar but oppose the Plan in its present form for a variety of reasons including development on Green Belt, need for updated housing figures from the government, existing air quality and traffic problems in Potters Bar and the lack of new health provision proposed for the town, instead relying on medical provision at Bowmans Cross.
Herts and Middlesex Wildlife Trust	n/a	In relation to Bowmans Cross, Objective 13 (ensure the successful relocation of the tree sparrow population) is simplistic and misleading; the site should be expanded into a dedicated tree sparrow nature reserve to all areas north of Coursers Road to offset loss of foraging and breeding areas to the south.
Hertfordshire County Council (Growth and Infrastructure)	n/a	<p>Detailed transport related changes requested to Objectives for Borehamwood and Elstree, Bushey, Bowmans Cross and Potters Bar.</p> <p>Given age of Borehamwood fire station, any re-provision may either be in Borehamwood or co-located at a suitable alternative location.</p>
Hertfordshire County Council (property)	Various including HEL385c, Popes Farm, HEL274 Edgwarebury House Farm, HEL318 Former Sunnybank Primary School	Welcome classification of South Mimms as a key village within Hertsmere. Site HEL385c will deliver on some of the key objectives in this section: Objective 3 (reinforcing and enhancing character of the village), Objective 8(promoting sustainable transport), Objective 4 (reducing impact of the M25) and Objective 7 (enhancing existing public rights of way and green corridor).
Masonic Charitable Foundation (site promoter)	B2, Compass Park, Bushey	Support and welcomes the role that is outlined for Compass Park in achieving the objectives within the place strategy for Bushey, particularly the delivery of a sustainable new neighbourhood.

Organisation	Site promoted	Key point(s) made
RAID (residents against inappropriate development – Bentley Heath)		The Clinical Commissioning Group on the capacity for local doctors and dental surgeries in Potters Bar needs to be reviewed. Insufficient capacity to accommodate an additional 2180 new homes built in Potters Bar with no new provisions for GPs in Potters Bar.
Redrow Homes (site promoter)	B1, Harts Farm	The delivery of site B1 as a new sustainable neighbourhood is not included as a local objective, whereas other allocated sites such as Compass Park and Heathbourne Green are. Delivery of B1 should also be included as a local objective.
South Herts Living Streets Group	n/a	The severance of existing walking and cycling routes to the south and east of the village by M25 J23 roundabout, should be added to the challenges listed.  Specific drafting change requested to Objective 7 (walkable neighbourhoods) for South Mimms.
Welwyn Hatfield Council	n/a	In relation to education infrastructure for Potters Bar, there is mention of Chancellors School, Brookmans Park. Whilst within the Potters Bar school planning area, the ability of this school to meet needs arising from growth in Potters Bar will be severely limited, as capacity will be required to meet needs arising from development proposed in the draft Welwyn Hatfield local plan.

### Sustainable Growth and Regeneration

- 6.18 The policies set out within this part of the plan were largely strategic in nature and were broadly supported. Policy SG1 (Creating sustainable development) is an overarching policy for the plan and it was suggested that some of the drafting within this policy in particular, was too generic; the addition of measurable targets would allow the performance and effectiveness of policies to be monitored over time.
- 6.19 Reflecting their comments elsewhere in the plan, residents expressed concerns regarding existing infrastructure deficits, especially for schools (secondary and special needs) and GP/dental surgeries. The provision of a secondary school closer to Radlett/Shenley was highlighted and this was a particular point picked up in responses to other parts of the draft plan. The public also pointed to the absence of sustainable transport projects for the borough, particularly to support the new settlement.
- 6.20 Policy SG6 (Developer contributions) covered the role of s106 contributions and the intention to introduce a baseline CIL. The development industry largely supported a new baseline CIL rate for strategic sites although it was suggested further detail would have been helpful. The cut-off between strategic and non-strategic sites (200 units), in particular, needed to be clarified in relation to South Mimms, where a number of smaller parcels have been identified together as comprising a single strategic site
- 6.21 The Health and Wellbeing policies were supported although it was suggested that a greater connection be made between the loss of green space and mental health.

**Policies SG1 to SG8: Summary of responses from statutory bodies, other organisations and development industry**

<b>Organisation</b>	<b>Site promoted</b>	<b>Key point(s) made</b>
Aldenham Parish Council	As landowner also promoting HEL386 Gravel allotments, Heathbourne Road, Bushey Heath HEL219/252 Pegmire Lane Patchetts Green	Expressed concerns regarding the scale and distribution of schools and surgeries across the borough
Churchill Retirement Living and McCarthy and Stone (joint submission)	n/a	Broad support for SG7 and greater provision of specialist housing for an ageing population
CPRE	n/a	The effectiveness of SG1 is undermined by the absence of measurable targets in the authority's Climate Change and Sustainability Strategy. Greater emphasis should be given to the use of brownfield land for development and also higher densities rather than a high dependence upon Green Belt release. Lower water consumption is supported but the condition of local chalk streams is a concern.
Crown Estate (site promoter)	R1, Land north of Watford Road	Broad support, but for SG5 clarification would be helpful regarding the scale of development where detailed infrastructure studies are required i.e. all new development or majors?
Hertswood Academy	n/a	The Academy have expressed concerns regarding the future of Aldenham Reservoir and its condition.
Hertfordshire County Council (Growth and Infrastructure)	n/a	HCC broadly support SG1, some Green Belt is required to be released given the level of housing need. This could be added to criterion x. The impact upon ecologically sensitive areas should also be acknowledged.  For Policy SG4, the HCC mention there are inconsistencies between the Plan and the IDP, e.g. for fire and rescue services and a primary school in South Mimms. The criteria used to define strategic sites works well with the exception of South Mimms where multiple smaller sites are proposed.  HCC (education) have highlighted the demand for secondary school places in the Bushey area.
Hertfordshire County Council (property) (site promoter)	Various including HEL385c, Popes Farm, HEL274 Edwarebury House Farm, HEL318 Former Sunnybank Primary School	HCC have requested the inclusion of the Guide to Developer Contributions (GIDC) in SG6
Hightown Housing Association	n/a	The word "operational" should be added to line (i) in SG2

Organisation	Site promoted	Key point(s) made
Richborough Estates (site promoter)	HEL214 Land South of Theobald Street, Radlett	SG2: There is a need for some degree of flexibility here to recognise this exceptionally may not always be achievable.
Sport England	n/a	SG6: minor change to ii, add sport after open space SG7: the focus upon heath inequality is welcomed but the policy could be more effective if the merits of co-location of community infrastructure were encouraged and also infrastructure should include blue and green infrastructure.
Thames Water	n/a	SG5: link build out rate of development to known capacity of infrastructure.
Urban & Civic (site promoter)	NS1 Bowmans Cross	Broad support, pleased to see emphasis on walkable neighbourhoods and healthy lifestyles. Supports timely delivery of infrastructure to support phased development

### **Policies H1 – H10 Meeting Local Housing Needs**

- 6.22 The housing section of the draft Local Plan generated a significant number of responses from a range of statutory and non-statutory organisations, reflecting the number of policies and allocations. Given the number of responses received in relation to the housing section, they have been broken down by individual policy, as set out below.

#### **Policy H1 The Supply of New Homes**

- 6.23 The meeting of the housing target in full was supported by other local authorities, either in relation to Policy H1 or other parts of the plan, where the housing requirement was referenced. This reflects the consensus across all authorities in the South West Hertfordshire housing market area that the standard method provides the basis for setting the housing requirement in each authority area.
- 6.24 However, both the CPRE and Aldenham Parish Council were not supportive of this approach and were predominantly concerned that the housing number is too high, based on out of date household projections and unjustified. These organisations objected in principle to the loss of Green Belt as well as the detrimental effects of the housing requirement on the local area and existing infrastructure. Although other local organisations objected robustly to the number of new homes required in the draft plan, these comments were made against other parts of the plan including in relation to individual sites and settlements, rather than specifically referencing Policy H1.
- 6.25 Conversely, the Home Builders Federation (HBF) and some developers (including those whose sites were not allocated) considered that the housing target was not high enough, with the plan period needing to be longer and a 20% buffer applied to the annual requirement, rather than the 5% buffer used. Some developer responses also suggested that additional housing sites are required because the plan period needed to run to 2039 and beyond. Concerns were raised from other developers in relation to the housing trajectory used with an overreliance of large strategic sites including reliance on Bowmans Cross through to 2031. The need for an updated Housing and Employment Land Availability Assessment, as well as further evidence on housing calculations, anticipated commitments and windfalls, was set out in some of the responses provided. Some developers, however, whose sites were included supported the approach taken in H1.
- 6.26 A relatively small number of residents specifically submitted a response in relation to Policy H1. It should be emphasised that the housing requirement, as stated in Policy H1, is referenced in other parts of the plan and many residents commented elsewhere in relation to overall housing numbers. Those residents who commented on Policy H1 itself were

particularly concerned that the housing requirement was based on out of date household projections. Reference was made to the Local Housing Needs Assessment and its reliance on figures generated by old demographic projections. A number of responses specifically questioned the concept of housing 'need' and whether the figures being used reflected 'real world' developments such as Brexit, Covid and the government's levelling-up ambitions. It was suggested that an updated assessment of housing need was required.

- 6.27 Many of those residents who responded to H1 specifically referenced the impact on Radlett and its infrastructure. It was also suggested that the release of Green Belt land was driven by the needs of land owners and developers, rather than local housing needs, due to the profitability of developing such sites.

**Policy H1: Summary of responses from statutory bodies, other organisations and development industry**

<b>Organisation</b>	<b>Site promoted</b>	<b>Key point(s) made</b>
AEW Europe (site promoter)	The Point, Borehamwood	Support the general principles and aims of the policy.
Aldenham PC	As landowner also promoting HEL386 Gravel Allotments, Heathbourne Road, Bushey Heath HEL219/252 Pegmire Lane Patchetts Green	Calculations for housing need from central government are flawed and should be challenged, and not used as basis for development of Green Belt. There is a need for development to provide for national housing needs, in particular affordable housing, but the plan as presented meets neither of these objectives.
Barhale Plc (site promoter)	Tarmac Land south of M25 HEL159a and north of Bell Lane/Salisbury Hall HEL159b	Housing delivery rate at Bowmans Cross appears to be optimistic
Beacon (Mimms) Ltd (site promoter)	HEL173 and HEL516 Greyhound Lane, South Mimms	Reference to 'small scale' for rural locations should be removed from H1 as this is a planning judgement for each site. Final sentence regarding isolated housing sites is accepted. Additional years need to be added to plan period to enable full 15 year housing supply; this will require additional sites.
Cala Homes (site promoter)	S1 Shenley Grange	Reference to 'small scale' for rural locations should be removed from H1 as this is a planning judgement for each site. Final sentence regarding isolated housing sites is accepted. Additional years need to be added to plan period to enable full 15 year housing supply; this will require additional sites.
Churchill Retirement Living and McCarthy and Stone (joint submission)	n/a	H1 is not sound as the plan does not positively plan for the delivery of specialist accommodation for older people, including a target for the delivery of homes for older people and with a commitment to maintaining a supply of land to meet that target.
CPRE	n/a	Draft policy should be changed as the figures are significantly in excess of a reasonable assessment of housing need/reasonable housing target for the DHLP. Policy is also inconsistent in requiring both the retention of existing housing (criterion iii) and prioritising the development of previously developed land (criterion iv) which includes areas and sites of existing housing.



Organisation	Site promoted	Key point(s) made
Crown Estate (site promoter)	R1, Land north of Watford Road	The proposed approach to determine housing needs (minimum standard methodology plus 5% buffer in order to ensure choice) is understood in a constrained Borough.
Gilston Investments (owners of Wrotham Park Estate) (site promoter)	BE3 Land east of Cowley Hill, PB3 Land south of Potters Bar	20% buffer may be required to be applied to housing numbers. Council may wish to review reliance upon the delivery of homes from Bowmans Cross in the period to 2031.
Hertfordshire County Council (property) (site promoter)	Various including HEL385c, Popes Farm, HEL274 Edgwarebury House Farm, HEL318 Former Sunnybank Primary School	HCC supports the notion that it has been necessary to release some land from the Green Belt following rigorous assessment, in order to meet the Borough's identified housing need, which constitutes exceptional circumstances.
Oxhey Lane Developments Ltd (site promoter)	HEL357, Oxhey Lane	Issues with H1 include inadequate buffer over and above standard method and over-reliance on large allocations including, in particular, Bowmans Cross
Redrow Homes (site promoter)	B1 Harts Farm, Bushey	Support the draft policy in principle.
Three Rivers DC	n/a	Welcome housing target of 12,160 homes as it meets Hertsmere housing needs. Acknowledgement of resultant release of Green Belt in order to meet such needs. It would be helpful to include justification for the level of windfall included per settlement.
Veladail Leisure Ltd (site promoter)	Bushey Hall Golf Club	Issues with H1 include inadequate buffer over and above standard method and over-reliance on large allocations including, in particular, Bowmans Cross

## Policy H2 Affordable Housing

- 6.28 There were relatively few responses to Policy H2, a detailed policy setting out specific requirements for the delivery of Affordable Housing on development sites. A number of the responses supported the headline 40% requirement and the lack of specific comments on the policy from most site promoters would indicate a general acceptance of this requirement, subject to viability. However, the HBF highlighted that the Council had not published any viability evidence and as such it could not comment on whether the policy requirement was sound.
- 6.29 A response from a large Registered Provider, Hightown, suggested that Policy H2 should set a high minimum for social rent delivered via s106 in the standard way with the majority of the rented homes being for social rent. The requirement that 'at least 50%' of rented homes should be social rented where grant funding is available was considered to be insufficiently ambitious, with comparison made to other local authorities. Specific reference was also made to the fact that tenure blind delivery should extend to garden space given the propensity of developments to have smaller gardens for affordable units.
- 6.30 The specific requirement for a financial contribution in lieu of affordable housing on sites delivering between 5 and 9 dwellings was criticised by other respondents for not being consistent with the Framework, and placing too much of a burden on small house builders.

- 6.31 Responses were also received from retirement living developers highlighting the lack of viability information. It was stated that in the absence of viability testing, it was not appropriate to require C2-type housing to be subject to the same requirements as other housing. It was emphasised that this sector had higher construction costs, longer phasing, slower sales and more non saleable space.
- 6.32 Although many of the submissions made by the general public referenced the need for more affordable homes in the borough, there were very few individual responses specifically in relation to or referencing Policy H2. The small number of comments which were received expressed scepticism that the affordable units would actually be affordable, due to existing high property prices in the local area and the view developers will make significant profits.

**Policy H2: Summary of Responses from statutory bodies, other organisations and development industry**

Organisation	Site promoted	Key point(s) made
Aldenham PC	As landowner also promoting HEL386 Gravel Allotments, Heathbourne Road, Bushey Heath HEL219/252 Pegmire Lane Patchetts Green	Allocating Green Belt land in one of the most expensive areas outside London, will just generate more expensive housing which will be unaffordable levels for many people in the borough
Beacon (Mimms) Ltd (site promoter)	HEL173 and HEL516 Greyhound Lane, South Mimms	Object to the requirement set out in paragraph 5 of this policy that developments of between five and nine units will pay a financial contribution in lieu of on-site affordable provision
Cala Homes (site promoter)	S1 Shenley Grange	Object to the requirement set out in paragraph 5 of this policy that developments of between five and nine units will pay a financial contribution in lieu of on-site affordable provision
Churchill Retirement Living and McCarthy and Stone (joint submission)	n/a	No viability information has been published reducing scope to comment on this important part of the evidence base; the R18 plan should be re-consulted with supporting viability information. Viability of specialist older persons housing is more finely balanced than general needs housing.
Crown Estate (site promoter)	R1 Land North of Watford Road, Radlett	40% policy requirement is necessary but clarification sought for the definition of residential units/new homes for triggering affordable units, particularly in relation to C2 units.
Hertfordshire County Council (property) (site promoter)	Various including HEL385c, Popes Farm, HEL274 Edwarebury House Farm, HEL318 Former Sunnybank Primary School	Welcome reference to use of Vacant Building Credit. Requirement for financial contribution on sites delivering between 5 and 9 dwellings is contrary to NPPF and should be removed.
Hightown Housing Association	n/a	H2 should be more ambitious in terms of social rent provision including where grant funding is available; current requirement for at least 50% social rent sets the bar too low. Comparisons made to other local authorities. Amendments suggested to ensure tenure blind design extends to gardens.

Organisation	Site promoted	Key point(s) made
Home Builders Federation	n/a	In the absence of viability information, cannot provide comments. The Council notes it will fall short of meeting affordable housing needs in full and so the allocation of additional sites would be the most effective mechanism for addressing the acute need for these homes.
Inspired Villages (site promoter)	HEL212 Land Off Watford Road, Elstree Village	Not appropriate to apply affordable housing policies to C2 extra care if the Local Plan viability assessment has not tested it. Extra care model is different from C3 residential for multiple reasons including reduced saleable GIA.
LB Enfield (property) (site promoter)	PB4 Land south of Park Avenue, HEL162 Land South of Barnet Road, Potters Bar	Affordable Housing provision falls short of identified need; increase in LP target in line with SW Herts LHNA (2020) would be welcomed.
Redrow Homes (site promoter)	B1 Harts Farm, Bushey	Support the principle of Policy H2. Viability work has not been published; clarification need as to when this information will be made publicly available. Reserve the right to comment further until such a time
Richborough Estates (site promoter)	HEL214 Land South of Theobald Street, Radlett	Policy H2 only refers to affordable housing being homes for rent and affordable home ownership and fails to refer to other types including starter homes, discounted market sales housing and other affordable routes to home ownership. Further clarity is required over the mix.
Truveya (formally TLC Group) (site promoter)	B4 Heathbourne Green, Bushey Heath	Supportive of the Council's approach to their housing policies in order to meet future housing need. Consider that affordable housing applies to C3 uses and not C2 housing with care. The viability impacts from requiring affordable housing from specialist housing for older people within a C2 use needs to be evidenced.
Three Rivers DC	n/a	Support the 40% requirement for affordable housing in Policy H2, given the mutual significant need for affordable housing across South West Herts.
Urban & Civic (site promoter)	NS1 Bowmans Cross	Support the aim of Policy H2

### **Policy H3 Affordable Housing on rural or First Homes exception sites**

- 6.33 No comments were received specifically relating to the provision of this policy which related to specific types of Affordable Housing.

### **Policy H4 Provision for Gypsies and Travellers**

- 6.34 There were a limited number of responses from organisations in relation to this policy with the majority of comments in relation to Gypsy and Traveller provision being made by the general public. The draft plan proposed that some additional provision be made on three strategic sites (in Borehamwood, Radlett and at Bowmans Cross). Two of the three site promoters where the policy requires gypsy and traveller pitches to be provided, as well as two neighbouring local planning authorities, were supportive of the policy. The promoter of one of the sites considered that it was logical that Gypsy and Traveller provision should be through small sites of no more than 6 pitches.

- 6.35 The majority of residents who commented were not supportive of the requirements set out in the policy; this was in addition to a number of residents who objected to Gypsy and Traveller provision in their responses to other parts of the plan.
- 6.36 The proposal to include 6 pitches on site R1 (Watford Road, Radlett) generated the most objections with residents concerned about damage to the Green Belt, disruption to the local community, overburdening of local infrastructure, anti-social behaviour/crime and the potential effect on house values. Reference was made to evidence of increased crime rates and anti-social behaviour from permanent sites in Borehamwood; it should be emphasised that there are no permanent sites in Borehamwood.
- 6.37 The location of pitches on R1 was also of concern due to its location close to a primary school and the lack of a police station in Radlett. It was argued that pitches would be inappropriate development in the Green Belt and no special circumstances had been demonstrated; brownfield sites, or extensions to existing sites should first be identified. Concern was raised as to who would manage sites, and whether HCC were capable of providing the necessary support and control. An objection to larger sites was raised on the grounds that they were more difficult to control, particularly in respect of ensuring that the authorised number of pitches was not exceeded. It was, however noted, that providing authorised pitches for an identified need could reduce the potential for conflict with the settled community as there would be fewer occurrences of unauthorised encampments. The importance of securing the integration of Traveller and settled communities, should new pitches be provided, was also stated. On the other hand, the question as to whether provision of more pitches would encourage more Travellers to move to the area was also highlighted.

**Policy H4: Summary of responses from statutory bodies, other organisations and development industry**

<b>Organisation</b>	<b>Site promoted</b>	<b>Key point(s) made</b>
Aldenham PC	As landowner also promoting HEL386 Gravel Allotments, Heathbourne Road, Bushey Heath HEL219/252 Pegmire Lane Patchetts Green	Given the number of existing mobile home sites in the area, it is unclear whether additional provision is to meet growth of the existing population or if it will encourage others to move to the area.
Crown Estate (site promoter)	R1 Land North of Watford Road, Radlett	Support Policy H4 and acknowledge that the site accommodates 1 x 6 pitch site. Logical that proposals for small sites should be no more than 6 pitches.
LB Enfield	n/a	Welcome further discussions on the issue of Gypsy and Traveller accommodation, as LBE has an identified need of 21 pitches, and no sites have been identified as part of our Call for Sites and Local Plan consultation earlier this year.
Urban & Civic (site promoter)	NS1 Bowmans Cross	Support Policy H4 and acknowledge that Bowmans Cross would accommodate 2 x 6 pitches.
Three Rivers DC	n/a	Welcome protection of existing authorised/allocated sites and support additional provision to meet identified needs

**Policy H5 New and extended Park Homes sites**

6.38 The only response specifically in relation to this policy was from LB Barnet who supported its provisions and in acknowledging that the Park Homes site at Stirling Corner was split across the borough boundary with LB Barnet, asked that this be acknowledged in the supporting text to the policy.

#### **Policy H6 Housing mix**

6.39 The majority of organisations who responded to Policy H4 also responded to Policy H6 and were broadly supportive of the approach being sought to achieving an appropriate mix and size of units. However, greater flexibility was sought by a number of the respondents. In addition, the supporting text with its breakdown of need for affordable home ownership by size was highlighted by a Registered Provider as being very unhelpful with the scope for unintended consequences in an area of high property values; it was considered that the focus should be on one and two bedroom units.

6.40 Representations made on behalf of a site promoter seeking to deliver a large amount of specialist older persons housing on their site, did not consider that the requirements for specialist housing on schemes of 100 units upwards fully understood their viability needs.

6.41 A number of points were made in relation to the specific requirements for accessible and wheelchair housing which are more prescriptive than in the current local plan. It was suggested that the policy needed to be more flexible given that wheelchair housing, in particular, must be bespoke rather than designed on spec. It was also suggested that the wheelchair accessible housing requirement, as indicated in national policy guidance, be limited to Affordable Housing where the local authority can nominate the occupier. The point was also made that rather than many of the adaptations to M4 standards which are required to address long-term health problems can be made to existing homes.

6.42 There were very few responses specifically in relation to Policy H6 from the general public. Support was expressed for the policy with one response emphasising the need for more specialist accommodation in Shenley to meet disabled and older persons' requirements. One response considered that a requirement for 25% of homes to have 4+ bedrooms will create an over provision of large housing.

#### **Policy H6: Summary of responses from statutory bodies, other organisations and development industry**

<b>Organisation</b>	<b>Site promoted</b>	<b>Key point(s) made</b>
AEW Europe (site promoter)	The Point, Borehamwood	Support the general principles and aims of the policy in support of mixed and balanced communities established through an objectively assessed need.
Barratt David Wilson Homes (site promoter)	BE6 Land north of Barnet Lane, Borehamwood	Aspiration of Policy H6 is supported. However, policy needs to retain its current flexible form and should not introduce any set percentage of minimum number of new homes to ensure there is no conflict with site-specific requirements in Policy H10.
Churchill Retirement Living and McCarthy and Stone (joint submission)	n/a	Policy is supported, although it is recommended that the minimum standard of 25 units as a proportion of homes suitable for wheelchair users should be in line with the affordable housing threshold. Revisions to Table 16 suggested.
Crown Estate (site promoter)	R1 Land North of Watford Road, Radlett	Proposed approach is supported. For schemes of 300+ units, the requirement for a proportion of specialist housing with support or care is also supported in principle. It should

Organisation	Site promoted	Key point(s) made
		though be recognised that market demand will need to be taken into account.
Hertfordshire County Council (property) (site promoter)	Various including HEL385c, Popes Farm, HEL274 Edgwarebury House Farm, HEL318 Former Sunnybank Primary School	Support the general principles in regards to housing mix, but specialist housing numbers should be sought in consultation with the service provider so it can be delivered at appropriate locations to meet need.
Hightown Housing Association	n/a	No objection to requirement that affordable housing, whether rented or low cost sale, should meet local need. The recommended mix of housing for affordable home ownership should be almost exclusively one and two bedrooms. Table 15 which covers strategic level need for 3 bed and 4 bed houses for first time buyers is unhelpful in an area of high property values.  In relation to requirement for 7.5% affordable wheelchair units, such housing cannot be built on spec; it must be bespoke. The policy should be more flexible and less formulaic about % and to encourage early LA liaison with both HA's and housebuilders.
Home Builders Federation	n/a	Recognise some homes will need to be built to either M4(2) or M4(3) but concerned that insufficient evidence has presented to justify the policy. Council has not considered whether individual needs can be met through adapting existing homes or homes built to M4(1) standard.
Inspired Villages (site promoter)	HEL212 Land off Watford Road, Elstree Village	Policy applies a blanket provision with no recognition as to what specialist housing type for older people is required. Council should engage with developers and specialist housing providers to fully understand what is needed.
Redrow Homes (site promoter)	B1 Harts Farm, Bushey	Supports this policy and the flexibility of the wording used.
Richborough Estates (site promoter)	HEL214 Land south of Theobald Street, Radlett	Unclear what particular focus means in practice in regards to 2/3 bed properties.
Truveya (formally TLC Group) (site promoter)	B4 Heathbourne Green, Bushey Heath	The approach to seeking an appropriate housing mix is in accordance with the NPPF. However, the requirement for large scale schemes of 100 units upwards to deliver specialist housing with support or care (as defined under emerging policy H7) fails to fully understand the specifics of such schemes in regard to their viability.
Three Rivers DC	n/a	Support the policy but do not feel requirement for M4(3) dwellings can be applied to market dwellings.

### Policy H7 Specialist housing with support or care

6.43 The organisations responding to Policy H7 also commented on the detailed housing mix requirements in Policy H6. Given that the policy was specifically focussed on specialist/supported housing, detailed responses were received from providers of this type of housing. One of these responses specifically considered that the quantum of specialist

housing provision required has been underestimated in the Local Housing Needs Assessment. Another response specialist housing provider considered that in the absence of viability and deliverability evidence, the 40% Affordable Housing requirement for C2 housing could not be justified.

- 6.44 A single response specifically in relation to Policy H7 was received. This emphasised the need for consideration to be given to increased specialist housing provision to serve aging community in settlements, such as Radlett. Such provision would free up underutilised existing housing stock. It was suggested that whilst identifying the level of need, the plan did not set out how this would be delivered and that sites needed to be identified. Comments were also made in relation to specific sites being good locations for elderly accommodation such as HEL231 (Starveacres) and HEL320 (land formerly part of Earl and Cross Keys Farm)

**Policy H7: Responses from statutory bodies, other organisations and development industry**

Organisation	Site promoted	Key point(s) made
Churchill Retirement Living and McCarthy and Stone (joint submission)	n/a	An understanding of how the ageing population affects housing needs to be considered from the early stages of plan-making. Despite the largely positive manner which Policy H7 addresses the Housing Needs of the elderly, it is undermined by the lack of consideration given to older persons housing typologies in Policy H2.
Crown Estate (site promoter)	R1 Land north of Watford Road, Radlett	Proposed approach is supported.
Hertfordshire County Council (property) (site promoter)	Various including HEL385c, Popes Farm, HEL274 Edgwarebury House Farm, HEL318 Former Sunnybank Primary School	Clarity is sought on the types and number of care home beds and the term vulnerable adults. Recommended that the proposed threshold for contributions to specialist housing of 300 units be revised down to 150. Policies should also refer to the growing number of families and children and residents with trauma who are requiring accessible properties.
Inspired Villages (site promoter)	HEL212 Land off Watford Road, Elstree Village	Need numbers are artificially low and fail to recognise ageing population. Locational characteristics for specialist accommodation does not recognise the different typologies which exist and para 75 affordable housing is not evidence based. Detailed viability work in relation to this policy is required given the different costs associated with C2 and C3.
Truveya (formally TLC Group) (site promoter)	B4 Heathbourne Green, Bushey Heath	The approach to seeking an appropriate housing mix is in accordance with the NPPF. However, the requirement for large scale schemes of 100 units upwards to deliver specialist housing with support or care (as defined under emerging policy H7) fails to fully understand the specifics of such schemes in regard to their viability.
Urban & Civic (site promoter)	NS1 Bowmans Cross	Recognise the aims of Policy H7 but require further discussions with HBC about the percentage of specialist housing that it is provided across the plan period.

## Policy H8 Redevelopment and loss of residential units

6.45 No responses were received specifically in relation to Policy H8.

## Policy H9 Self-build and custom-build homes

6.46 The organisations responding to this policy supported its overall aims. However, there were different views expressed as to whether or not the proportion of self build homes should be prescribed; the draft policy does not include a specific amount. It was also suggested that provision could be sought on smaller sites whereas the draft policy only requires that land is set aside for self-build/customer build on identified strategic allocations.

6.47 No responses were received from the general public in relation to this policy.

### Policy H9: Summary of responses from statutory bodies, other organisations and development industry

Organisation	Site promoted	Key point(s) made
Crown Estate (site promoter)	R1, Land north of Watford Road	The proposed approach to set land aside but not to prescribe proportion is supported.
Hightown Housing Association	n/a	Affordable self build, as opposed to market and self and custom build, is high risk, and management intensive. There is a risk that plots do not get taken up or self-builders fail, leaving half-finished sites.
Home Builders Federation	n/a	Supportive of the self and custom housebuilding market. Important for the Council to consider whether it can allocate additional small sites for such development on the edge of settlements rather than only changing the way a unit is delivered on larger allocated sites.
King and Co. (site promoter)	HEL375, Manor Road, Potters Bar, HEL255/HEL254 Blanche Lane, South Mimms HEL341, Allum Lane	The “completion” of homes within a period rather than “implementation” needs to be read alongside national guidance to ensure that there is no unnecessary constraint to plan-led delivery.
Redrow Homes (site promoter)	B1 Harts Farm, Bushey	Support the policy which is consistent with NPPF. Approach of a fall-back option of reverting any unsold self-build plots to the developer to build is strongly supported.
Truveya (formally TLC Group) (site promoter)	B4 Heathbourne Green, Bushey Heath	Policy is welcomed and is based on the current evidence on the LHNA (2020).
Urban & Civic (site promoter)	NS1 Bowmans Cross	Policy is supported but require further information on what percentage of self/custom-built might be required and how much land should be set aside for this use.

## Policy H10 Housing Land

6.48 As the most detailed policy in the draft plan, containing all of the residential allocations, there were a significant number of responses in relation to Policy H10 from the general public, as well as statutory bodies, national and local organisations and the development industry.



6.49 As well as setting out details of all proposed sites, Policy H10 also covered the need for compensatory Green Belt and other site-specific measures as well as the council's approach to small sites of less than 1 hectare as required by the NPPF. However, almost all responses from organisations were focussed on particular sites. Other than the response from Historic England, who commented that heritage impact assessments (HIA) should be prepared in advance of the next draft plan to justify the allocation of sites. In addition to responses from the development industry submissions were received from the following organisations and focussed on one or more of the individual sites identified in Policy H10.

- Aldenham Parish Council
- Affinity Water
- ALFA (Allum Lane)
- British Horse Society
- Bushey and District Footpaths Associations
- Bushey Forum
- Campaign for Colney
- Colney Heath Parish Council
- Communities First
- Dacorum Borough Council
- De Havilland Aircraft Museum
- Elstree and Borehamwood Green Belt Society
- Elstree and Borehamwood Town Council
- Elstree Screen Arts
- Environment Agency
- Golfwatch Residents Association
- Heath-Ways Residents Association
- Hertfordshire County Council
- Hertfordshire Natural History Society
- Herts Bird Club
- Herts and Middlesex Butterfly Conservation
- Herts Middlesex and Wildlife Trust
- Herts Valleys CCG
- Hightown Housing Association
- Letchmore Heath Village Trust
- Little Bushey Community
- Little Heath Action Group
- London Boroughs of Barnet and Enfield
- London Colney Parish Council
- Ministry of Defence
- National Highways
- North Mymms District Green Belt Society
- Open Spaces Society
- Potters Bar Society
- NW London RSPB Group
- Radlett Society and Green Belt Association
- RAID (Bentley Heath)
- Royds RA
- Ramblers Association
- Save Clarendon Park

- Save Tyttenhanger
- Severn Trent Green Power
- Shenley Neighbourhood Plan Steering Group
- Shenley Parish Council
- South Herts Living Streets
- South Mimms Parish Council
- Sports England
- St Albans City and District Council
- Thames Water
- Watford Borough Council
- Watford CAMRA
- Welwyn Hatfield Borough Council

Note: The above list is based on organisations responding who (or a consultant on their behalf) clearly identified themselves in their response as an organisation.

- 6.50 The majority of developers, landowners and site promoters submitted representations which related to their own sites; these organisations supported the inclusion of their own sites in the draft plan but where there were particular concerns expressed, these have been highlighted below.
- 6.51 The responses received in relation to each site are summarised below, in the order in which they appear in the draft local plan. A number of representations were also received on sites, some of which had been promoted previously primarily for residential or employment purposes, but were not included in the draft local plan. These sites are listed in Appendix 3 of the report. A number of new site promotions were also submitted, primarily for residential or employment purposes, including a number of assets owned by Hertfordshire County Council; these are set out in Appendix 4.

### **Site BE3: Land to east of Cowley Hill**

- 6.52 Comments received related to the loss of high performing Green Belt land with reference made to stage 2 of the ARUP Green Belt report, which it was suggested does not recommend the site for release. The coalescence of Borehamwood and Shenley was highlighted in relation to the loss of Green Belt. A petition relating to the site, as well as the proposed Media Quarter and development at Organ Hall Farm, was also submitted.
- 6.53 The pressure on existing infrastructure was cited by many of those responding as well as harm to wildlife and rise in noise and air pollution. The loss of accessible green space and agricultural land was mentioned, with loss of trees and flooding also raised as landscape concerns. The unsustainable location of the site was identified as well as traffic impact, especially through Shenley to the M25 and A1. Access points into the site itself were also said to be dangerous. As the site is in Shenley parish rather than Borehamwood, it was suggested by organisations concerned with Borehamwood that the site should be considered against the Shenley Neighbourhood Plan and not be 'counted' in figures for the town.

### Statutory bodies, other organisations and development industry responding to BE3

Organisation	Key point(s) made
Elstree and Borehamwood Green Belt Society	Development is in Shenley and should not count towards Borehamwood figures. Stress on existing infrastructure in Borehamwood, but local taxes will go to Shenley. Loss of high quality Green Belt land, as shown in Arup Green Belt report, which will result in coalescence with Shenley. Harm to wildlife and increased light, noise and air pollution as a result of development. Traffic impact.
Elstree and Borehamwood Town Council	Queried why this has been included as a Borehamwood site as the housing would be in Shenley parish, and as such should be guided by Shenley Neighbourhood Plan. There is a lack of detail in the draft site allocation policy. The proposal would have a negative impact on local infrastructure, the local road network, pollution, light and air quality. The location is too isolated from existing facilities for the extra care living dwellings.
Environment Agency	This site borders the Catherine Bourne; development which impacts this water course has potential to impact water quality. The river must be protected via a development buffer and enhanced ecological area.
Hertfordshire County Council (Growth and Infrastructure)	Site is adjacent to three Local Wildlife Sites – ‘Birch Wood (Silver Hill)’ on the north-west side; and ‘Silver Hill Woodland Strip’ and ‘Wood next to Well End Road’ on the eastern side. Advise undeveloped buffers against these nature sites.  The primary school should be located in the centre of the site, in an accessible location. Enhanced public transport, cycle and pedestrian routes to key destinations required.
Shenley Neighbourhood Plan Steering Group	Site is in Shenley parish and will result in coalescence of Borehamwood and Shenley. Harm to landscape and ecology. Traffic impact, unsustainable location with insufficient infrastructure in Shenley. Only the southern part of the site is recommended for release in the Stage 2 ARUP Green Belt report.
Sport England	Sport pitch provision on site is welcome.

### Site BE5: Elstree Way Corridor

- 6.54 As the site is brownfield, as well as being allocated in the current local plan, there were largely supportive comments. It should be noted that BE5 was included in the long list of sites to which the template responses referred when objecting to further development of the Green Belt in the borough. Concerns about whether infrastructure, including whether the roads and health facilities would support the quantum of new development proposed, were raised, or would be provided given previous history in relation to the delivery of new facilities.
- 6.55 In supporting the principle of development at BE5, it was suggested however that high density, sustainable, affordable homes should be built. It was felt important that homes here met local needs, with the maximum provision of affordable housing. Given the demands on parking in the area, some objection to building on the Civic Office’s car park was expressed, but there was also support for a multi-storey car park with flats here as it was felt that providing housing here was preferable to building them on Green Belt land.

### Statutory bodies, other organisations and development industry responding to BE5

Organisation	Key point(s) made
Arco Development	BE5 boundary should follow the EWC boundary to maximise potential for new housing; robust justification for 40% affordable housing required.

Organisation	Key point(s) made
Elstree and Borehamwood Green Belt Society	As a brownfield site, do not oppose development but do not want tower blocks. New homes should reflect local needs and include at least 40% affordable homes or preferably 100% affordable homes for social housing, low income and key workers. Homes should be high density, sustainably built and affordable.
Elstree and Borehamwood Town Council	Need better public transport and health facilities. Would not support tower blocks.
Environment Agency	Development must ensure Maxwell Road Drain is protected - aim to deculvert
Hertfordshire County Council (Property)	As landowner support BE5 policy for locations 2 and 3; requested that secondary education provision be added to requirement for developer contributions
Herts Valleys CCG	Proposed new health facility to be subject to business case approval by Commissioner.
Thames Water	No problem anticipated. Local Planning Authority, developer and Thames Water to liaise.

### BE6: Land north of Barnet Lane, Borehamwood

- 6.56 Representations were made which pertained to the site being in the Green Belt, that it would exacerbate existing traffic congestion, and would impact on health facilities and water supply. There was concern that the site represents development on part of the village green, impacts on the Local Wildlife Site and would increase flood risk to adjoining areas.
- 6.57 The distance to the station was considered by some to be too far to walk, and the infrastructure for cycling and public transport considered inadequate to encourage people to use alternatives to the car. It was emphasised that the plan should make use of brownfield sites and empty homes before Green Belt sites. Some respondents supported the overall aims of the plan and the need for homes, particularly affordable homes, but did not support building within the Green Belt nor in this area of Borehamwood.

### Statutory bodies, other organisations and development industry responding to BE6

Organisation	Key point(s) made
Apcar Smith (for Clifton Management)	Remaining Green Belt gap between Borehamwood and Greater London would be insufficient and other sites perform less vital Green Belt role. Density of development would be out of keeping with prevailing character. Local facilities already at capacity and site is not sufficiently large to incorporate new facilities; no suggestion that off-site facilities would be provided. Limited public transport and not within reasonable walking distance of town centre; insufficient capacity within local road network, particularly junction of Furzehill Road and Barnet Lane.
Barratt David Wilson Homes (site promoter)	Entirely support Policy H10 with regard to the promotion of Site BE6.
Elstree and Borehamwood Green Belt Society	Part of the site is Village Green, part is LWS and there are also TPOs on-site. EBGBA challenge all proposed changes to the part of the site on the Village Green. WHVG is a great asset to Borehamwood and widely used by the local community, and has wildlife and historic interest. Proposed vehicular access onto Furzehill Road will exacerbate existing traffic congestion. Additionally, site is considered to contribute towards noise and light pollution, and impact air quality locally. The distance from Train station and GP practices is mentioned, impact on health and care facilities. Any building should take place on alternative sites, and proof is requested that HBC supports the protection of the current WHVG.

Organisation	Key point(s) made
Elstree and Borehamwood Town Council	The site is designated as a Village Green and LWS. The proposed vehicular access will be problematic, and the site will impact on local infrastructure.
Environment Agency	There are several ponds within the site which are a priority habitat of high biodiversity value. These ponds should be retained, suitably protected and enhanced. Note that the connectedness of ponds within a landscape is of high importance to provide ecosystem services and biodiversity value; ponds should not be isolated from one another.
Hertfordshire County Council (Growth and Infrastructure)	The sustainable transport policies for these sites are generally supported, however modifications may be needed following the transport work that is currently being completed.  The site is undeveloped with semi-natural habitats present so if affected biodiversity offsetting / net gain would be needed. Would object to important LWSs being affected by development; this site is already subject to discussions to enhance biodiversity and to avoid impact to the LWS.
LB Barnet	BE6 and HEL197 Barnet Lane largely serves as the boundary between LB Barnet and Hertsmere; would welcome being consulted during the design and application stages of BE6 and HEL197 so as best to understand any impacts the proposals will have on Barnet.

### Site B1: Land east of Little Bushey Lane, Bushey

- 6.58 Representations received predominately pertain to concerns around increased flood risk, as a result of the site being in the flood plain and increased traffic (Aldenham Road, Little Bushey Lane, Elstree Road, Sandy Lane). Traffic generated from both the residential and education elements of the proposals were a cause for concern, emphasising that most traffic is caused by people travelling from out of the borough, into Bushey, for schooling.
- 6.59 It was suggested that the unsustainable location of the site would result in car dependency and increased air pollution. Limited existing infrastructure provision was also highlighted specifically with regard to the existing stress on GP provision, sewage and water infrastructure. Harm to wildlife, equestrian facilities, loss of green open space and Green Belt were also raised, as was air and noise pollution from proximity to the A41 and M1.
- 6.60 The site promoter submitted a detailed response which challenged the requirements of HCC in relation to secondary school requirements in the area. The site was stated as being sub-optimal for a new secondary school and not in vacant possession. An assessment commissioned by the promoter concluded that there is currently no evidence of need for a new secondary school in the Bushey area, arising as a result of the proposed allocations in the Bushey area.

### Statutory bodies, other organisations and development industry responding to B1

Organisation	Key point(s) made
Bushey Forum	Objection to loss of Green Belt. Concerns regarding traffic and air pollution increase from proposed allocation. The site is subject to flooding.
Environment Agency	The site has a flood plain associated which needs to be identified in more detail through a level 2 SFRA. Development which would impact on Bushey Heath Drain will affect local water quality. To prevent this, generous buffer zone could provide the opportunity for a pocket park. This drain could also be deculverted to lower flood risk.

Organisation	Key point(s) made
Hertfordshire County Council (Growth and Infrastructure)	The site is remote from existing public transport services and diversion of existing public transport routes will likely not be possible without significant disbenefit to existing users. Site is not large enough to facilitate route diversion for a sufficient period of time, nor to make it viable in the long term. As a result, walking and cycling connections to local key destinations need to be explored.
Little Bushey Community	<p>Data underpinning the housing numbers in the plan is out of date and so site B1 is no longer necessary. The Council has not promoted an infrastructure solution instead implying that one will come once sites are in the draft plan which will negatively impact residents' mental health, increase pollution, destroy safe haven for wildlife and increase congestion. Site is home to an established flood plain on two sides and various protected species. Council must adopt an 'infrastructure first' approach.</p> <p>Public footpaths across the site offer access and environment that is not available elsewhere in Bushey.</p> <p>Distance from nearest local bus services and longer for bus to Stanmore station; 306 service already suffers delays from traffic congestion and frequent blockages in Chiltern Avenue and Farm Way.</p> <p>Traffic surveys undertaken by Wayside Avenue showing increase in traffic since 2018. Detailed observations provided on the developer's own traffic survey including criticism of key junctions identified and lack of road safety assessment.</p>
Redrow Homes (site promoter)	Significant objections raised in respect of HCC requirements for a new secondary school in the Bushey area. Site considered to be sub-optimal for a secondary school.
Three Rivers DC	Note that the HELAA (2019) indicates low accessibility for the site given that the site is not served by any bus routes and is one mile from local shopping parades and the centres of Bushey Village and Bushey Heath.

### Site B2: Compass Park, Land north of Farm Way

- 6.61 Many of the comments made in relation to Site B2 overlapped with those provided for B1. Flood risk concerns were raised, with existing surface water flooding highlighted. The existing strain on local infrastructure was highlighted including specifically, traffic on roads (Aldenham Road, Sandy Lane, Finch Road and Little Bushey Lane), health care, sewage and water capacity.
- 6.62 A loss of accessible open space, Green Belt and harm to wildlife was highlighted. Concerns were also raised around the maintenance of a clear area for the emergency landing required by Elstree Aerodrome, in relation to any part of the site used for a new secondary school or playing fields.
- 6.63 The site promoter submitted a detailed response which included challenging the requirements of HCC in relation to secondary school requirements in the area and the suitability of the site for a secondary school. The response stated there is a significant over-provision of secondary school capacity in the Bushey and Radlett school planning area relative to current and future secondary school age population. It was suggested the existing three secondary schools in the School Planning Area can absorb the impact of the

Local Plan proposals. Whilst welcoming the proposed allocation, the promoter also sought a number of other specific changes to the policy requirements for the site.

### Statutory bodies, other organisations and development industry responding to B2

Organisation	Key point(s) made
Aldenham Estate/Aldenham Aviation LLP	Whilst supportive of B2, object to any proposal for the community park element being used for either a new secondary school or as formal playing fields. This element of the site lies below the departure route for Runway 26.
Bushey Forum	Concerns expressed regarding Green Belt loss, air pollution and traffic.
Hertfordshire County Council (Growth and Infrastructure)	Sandy Lane improvements will need to take place in an early development phase. The impacts of Site B1 must be considered when undertaking an assessment of the issues on Sandy Lane. Walking and cycling connections to key local services need to be explored.
Little Bushey Community	Data underpinning the housing numbers in the plan is out of date and so Site B2 is no longer necessary. The Council has not promoted an infrastructure solution instead implying that one will come once sites are in the draft plan which will negatively impact residents' mental health, increase pollution, destroy safe haven for wildlife and increase congestion. Council must adopt an 'infrastructure first' approach.
Masonic Charitable Foundation (site promoter)	As promoter of the site, significant objections raised in respect of HCC requirements for a new secondary school in the Bushey area. Existing three secondary schools in the School Planning Area can absorb impact of proposals in the area without need for a new secondary school at the site.  Seek an amendment to replace around 750 new homes with around 850 new homes.  Reference to extension of the Metropolitan Police Sports Ground for additional sports facilities should be deleted as it will impact on landscape of site.  Various other detailed comments including in relation to removing the requirement for affordable housing from the retirement community element and removing the requirement for baseline CIL.
Sport England	Proposal to provide new outdoor sports provision that would enable an expansion of the Metropolitan Police Sports Ground is welcomed as it would be more appropriate to expand an established sports ground than create a standalone facility.
Three Rivers DC	Note the HELAA (2019) indicates low accessibility for the site but feel that the infrastructure requirements could make the site sustainable.

### Site B3: Land at former Bushey Golf and Country Club

6.64 Although there has been significant local interest in the site, following a previous consultation in relation to the future of the site, there were relatively few responses received from the general public. Responses from residents emphasised the unsuitable nature of Merry Hill Lane to accommodate the development, as well as concerns regarding access off the High Street. Heavy traffic on local roads were often cited and linked to air pollution concerns.

- 6.65 Enhancement of public rights of way through the site, linking Bushey Rose Garden to Woodland Trust Land to the north, was suggested, as was limiting development to the southern previously developed area. However, it was suggested that such development should just be for community facilities. In terms of the landscape of the site itself, the loss of accessible green space was raised as a concern alongside visual harm, harm to wildlife and loss of trees as well as the impact on St James’s Church. Insufficient existing infrastructure to accommodate development on the site was also highlighted with particular emphasis on drainage and water provision and health care services.

**Statutory bodies, other organisations and development industry responding to B3**

<b>Organisation</b>	<b>Key point(s) made</b>
Bushey Forum	The development proposed is different from what was discussed in consultation group and what we have asked for. Concern this is a box ticking exercise and Council will proceed as it sees fit rather than what residents want.
Hertfordshire County Council (Growth and Infrastructure)	Adjacent to the southern edge of ‘St. James Churchyard, Bushey’ LWS on the north-west corner, advise an undeveloped buffer on the boundary of the site in this area.  Merry Hill Lane may be unsuitable for access to the development. Public Rights of way and cycle and pedestrian links should be enhanced.
Sport England	Objection made to the allocation of this former golf course site for residential, due to loss of sporting facility. Sporting needs assessment required to justify allocation.
Three Rivers DC	Note the sustainable location of this site with access to services and facilities in Bushey and its links to existing public transport networks. In order to maximise the use of previously developed land, we encourage the concentration of new built form on the areas of existing development.

**Site B4: Land at Elstree Road and Heathbourne Road, Bushey Heath**

- 6.66 A more limited number of individual residents’ responses were received in relation to this site compared with most of the other strategic sites in the plan, in Bushey and across the rest of the borough. Comments received from residents focussed primarily on local issues, including concerns about flooding, a loss of Bushey’s identity, and highway and transport-related matters. The need for any required new homes to be affordable to first time buyers was also highlighted.
- 6.67 The cumulative impact from four major development sites in Bushey, particularly on Little Bushey Lane, was highlighted, including existing delays at the junction with Aldenham Road. There was a need for a sustainable transport strategy, and very substantial road / sustainable transport improvements to prevent exacerbating existing traffic problems. New link roads from both B4 and B1 onto the A41 were suggested to avoid exacerbating congestion on local roads. It was considered more beneficial to build new schools outside of Bushey, in areas such as South Mimms and Radlett.



### Statutory bodies, other organisations and development industry responding to B4

Organisation	Key point(s) made
Bushey Forum	Location adjoining A41 will lead to noise and air pollution for new residents and loss of green buffer to A41. Increased cars will lead to air pollution and traffic congestion.
Hertfordshire County Council (Growth and Infrastructure)	<p>Object to important LWSs being affected by development in the site. Elstree Road Pastures LWS falls within the boundary. Protect and buffer LWS interest. The site is also adjacent to Fields by Heathbourne Road LWS on the south-western side. Semi-natural habitats (including woodland and grassland) present so if affected biodiversity offsetting / net gain would be needed.</p> <p>Require walking and cycling connections suitable for all users to local key destinations, to be informed by the sustainable transport study. Should a new primary school site not be allocated on this site, a suitable off-site connection to enable realistic walking trips to a primary school must be achieved to conform with the wider transport policy.</p>
Three Rivers DC	Do not object to the principle but note that the HELAA (2019) indicates very low accessibility to local shops and services in Bushey Heath centre. The proposed site allocation policy requirements for a neighbourhood centre, local transport hub, new public bus service, enhancement of existing public transport services and walking and cycling routes will enable the site to be made sustainable.
Truveya (formally TLC Group) (site promoter)	<p>As promoter of the site, supportive of the emerging plan and the inclusion of site B4. Draft allocation should be amended to ensure it accords with paragraphs 35 (an appropriate strategy) and 124 and 125 (efficient and optimal use of land) reflecting the technical work undertaken by the Promoter which shows capacity of the site is nearer to 1,100 units.</p> <p>Request amendment to policy to reserve space for Little Bushey surgery instead of reserving land; recognise that the main access will be via Elstree Road not Heathbourne Road; and ensure land required for off-site highways improvements are also removed from the Green Belt.</p>

### Site PB2: Former Potters Bar Golf Course, Darkes Lane, Potters Bar

- 6.68 Many of the objections received in relation to this site were submitted using a bespoke form created by the local Golfwatch residents group as part of a campaign leaflet. The campaign website included proposals for an alternative 'regeneration project' centred on a cycling park, community hub, hotel and conference facility; this alternative proposal was not put forward by or on behalf of the landowner or site promoter.
- 6.69 Residents objecting to PB2 commented that brownfield sites should be considered before Green Belt, emphasising the narrowing of Green Belt gap between the town and Brookmans Park. Increased flood risk, loss of trees, reduced air quality, impact on the Darkes Lane West conservation area, loss of public open space, and noise from the railway line were also highlighted. It was argued that development would not further the aims of declaring a climate emergency. Infrastructure issues were also raised, in particular primary healthcare, schools and local road capacity. Concern about relationship of this with proposals within the Welwyn Hatfield Local Plan were also stated. The use of out of date demographic data, likely lack of affordable homes and the subjective nature of the evidence base were also highlighted.

- 6.70 Although flood risk was highlighted in many of the responses, no specific objection was raised by the Environment Agency and previously a flood risk assessment, hydraulic model and mitigation have been agreed with the Environment Agency and Lead Local Flood Authority. Nonetheless, the overall Environment Agency response highlighted concerns regarding the lack of a Level 2 Strategic Flood Risk Assessment (SFRA) for several of the site allocations which fall into areas of flood zones, suggesting that without a Level 2 SFRA, these sites will not have passed the exceptions test requirement for the flood risk sequential test.
- 6.71 In addition to the objections expressed, there were also comments received in support of the site from residents in the town, citing local housing need, and lesser Green Belt impact. There was also some support for a smaller proposal of affordable and/or retirement housing, and for the alternative hotel/leisure proposals.

#### Statutory bodies, other organisations and development industry responding to PB2

Organisation	Key point(s) made
CEG (site promoter)	As site promoter, support identification of Potters Bar as location for strategic housing development and overall level of housing for the site in the draft plan. Seek clarification as to what additional compensatory improvements, if any required, as well as in relation to creating a new clear and defensible Green Belt boundary. Emphasised that community hub facility should be self-sufficient. Greater clarity also requested in relation to specialist housing and community facilities requirements.
Golfwatch	Reservations expressed about Green Belt study methodology, and a lack of exceptional circumstances. Concerns also expressed about flood risk; sequential test and exception test not considered to have been demonstrated.
Environment Agency	Welcome the suggestion to enhance the Potters Bar Brook; improvements could include a complex buffer zone to ensure the brook is not impacted  Development that impacts this far upstream in a catchment has the potential to impact on water quality of the rest of the river catchment. The connected nature of the river catchment means that this development must be sensitively designed to ensure the Potters Bar Brook is well protected.
Hertfordshire County Council (Growth and Infrastructure)	Support the principle of development on this site due to its highly sustainable location, on the basis that it has minimal impact to the existing network as a highly sustainable type of development. Potters Bar has existing congestion issues, so if the site were to come forward as a more conventional residential proposal, significant transport impacts and constraints are expected.  Strategic sites supported in principle, with regard to inclusion of extra care housing. It is essential there is equal access to older persons' housing across the borough. Continued engagement needed as proposals become more detailed.
North Mymms Green Belt Society	Concerned at narrowing of fragile gap between Potters Bar and Brookmans Park.
Potters Bar Society	Opposed to any building on Green Belt land. Proximity to the Darkes Lane gives advantages of pedestrian access to both transport links and amenities in the area. The country park area presently lacking in this part of the town would be welcomed. However, single vehicle access point proposed is very problematic, since Darkes Lane is already congested. TPOs across the site. Unconvinced that flood protection measures are sufficient.
Sport England	Objection to the potential loss of golf course; no reference in the policy to a need for a golf needs assessment or mitigation.

Organisation	Key point(s) made
Welwyn Hatfield DC	Strategic Green Belt gap between Potters Bar and Brookmans Park but proposed area for development would not extend the urban area of Potters Bar any further north. Strategic infrastructure implications, in particular reliance on Chancellor's School to meet education needs.

### Site PB3: South of Potters Bar

- 6.72 Concerns were expressed about the loss of Green Belt and open space. Unstable land around the railway tunnel and subsidence of properties bordering the site were highlighted. The harm to wildlife and hedgerows was identified, with the loss of high grade trees, as well as an increase in the rat population, with associated risks to children attending Pope Paul Primary School. Concerns raised that important information about bats, newts, trees were omitted from the information available for the consultation.
- 6.73 Traffic increase was anticipated as a result of the development, with the main road of concern being the impact on Baker Street and the A1000. It was also suggested that the proposed link road running through the site would potentially become a 'rat run'. The stress on other existing infrastructure was also emphasised, such as health care services. Concerns about the suitability of the site for development were raised given the site's proximity to the M25 (noise and air pollution) and pylons on the site. The impact on the visual appearance of the adjacent Royds conservation area was also highlighted as a particular matter of local concern.

### Statutory bodies, other organisations and development industry responding to PB3

Organisation	Key point(s) made
Gilston Investments (owners of Wrotham Park Estate) (site promoter)	As site promoter, support inclusion of the site in the plan. Recommend amending policy to increase number of units from 900 to approximately 930.
Hertfordshire County Council (Growth and Infrastructure)	Transport policies of the site should align to the outcomes of the ongoing transport work including opportunities presented by sites location. Enhancement of walking and cycling routes to key destinations, including safeguarded corridor to Sunnybank School site to north.
LB Enfield	Would like to be involved in particulars of scheme, such as masterplan design and phasing. Wish to fully understand the impact of this allocation on the road network into LB of Enfield, primarily along the A111 and A1005. Any road impacts require mitigation.
Potters Bar Society	Oppose to any building on Green Belt land. Concerned that building on PB3 threatens the Green Belt through urban sprawl. Air pollution and noise arising from the proximity to the M25 will be detrimental to the health of residents. Area would require extensive infrastructure provision, including reliable bus services to both town centres, if further dependence on private cars is to be avoided. Royds area already suffers from flash flooding which results from run off from the PB3 area; this has recently become more frequent. TPOs and protected hedgerows on the site need to be safeguarded. Unconvinced that flood protection measures are sufficient.
Royds Conservation RA	Should not be developed for housing. Recognise need for additional housing but proposed quantum is over-estimated. Perhaps the most important Green Belt in the borough as it prevents Potters Bar being absorbed into Greater London. Impact on conservation area and rising land would result in

Organisation	Key point(s) made
	Royds properties being overshadowed. Site is too far from the town centre with significant impact on local facilities as well as traffic generation; junctions of Baker Street with Mutton Lane and Dancers Hill Road will be overloaded. Proposed link road within the site will create traffic rat runs around Santers Lane and Dugdale Hill Lane.
Sport England	Football pitch provision is welcome; policy wording should make it clear that more than one pitch needs to be provided on site.

### Site R1: Land north of Watford Road, Radlett

- 6.74 Concerns were raised that development would overwhelm the village feel of Radlett and its countryside setting; it would place a significant strain on the existing infrastructure including schools, GPs, blue-light services, and the local road network (including Watford Road, Watling Street and Loom Lane).
- 6.75 Residents responding were against the release of Green Belt and the loss of green space/agricultural land for development. The impact on the visual amenity, the local heritage assets including Kemprow Farm House, and the local wildlife and biodiversity (including great crested newts and the two Local Wildlife Sites) were also listed as major concerns, along with climate change and whether it was wise to develop land which acts a green lung for London. Many of the responses addressed R1 and R3 together.
- 6.76 The need and demand for this level of development within Radlett was questioned along with data and evidence to support this proposal. There were also concerns raised over the quantum of development to be served by Watford Road, the suitability of Oakridge Lane and the accessibility of the site to local services. Sustainable transport schemes including walking and cycling routes to serve the development and new school were needed. Some comments suggested that a better use for the site would be as a secondary school to serve Radlett, and questions were also raised about proposals for an additional primary school on site given its proximity to Fairfield School. Given the level of concern over certain onsite proposals, clarity was required over the indicative nature of the map contained within the policy. The provision of Gypsy and Traveller pitches also raised a number of concerns with consultees questioning whether there was the need for these facilities and whether this was in the best location.

### Statutory bodies, other organisations and development industry responding to R1

Organisation	Key point(s) made
Aldenham PC	This site is arable farmland and should continue to be used for farming. Suggested compensatory measures cannot compensate for the loss of this farmland and site does not form a natural extension of the existing settlement. Allocation is in complete contradiction of the RNP.  If site continues to be allocated, the proposed housing should reflect the identified need for smaller dwellings. Any new school on the site should be joined with Fairfield School opposite. Suggestion that occupants of the site will walk, cycle or use other modes other than car, to access Radlett and the train station is unrealistic.
Crown Estate (site promoter)	Welcome proposed allocation. Policy should be clear that locations shown for the Gypsy and Traveller Provision, Primary School, Retail Provision and

Organisation	Key point(s) made
	Commercial Development are indicative as there are options for the precise locations within the site for each of these uses. Further community and stakeholder engagement will shape this.
Hertfordshire County Council (Growth and Infrastructure)	Require deliverable access solutions for all modes of transport; education facilities will have their own transport requirements.  A high-quality route for walking and cycling likely to be required to Fairfield Junior School. Based on current information, cannot support the development of a vehicular access point from Oakridge Lane as it is not required, nor does it align with the policies of LTP4. Public Rights of Way cross the site and should be retained and enhanced.  Additional information is required though generally in support of the provision of extra care housing on strategic sites.
Oakridge Farm	Strong objection to the proposed release of this site from the Green Belt and its allocation for development. Detailed Agricultural Land Classification Report provided.
Radlett Society and Green Belt Association	Development would breach key Green Belt principle of preventing coalescence of communities; R1 effectively absorbs Kemprow and High Cross. Lack of consideration to real infrastructure needs, including on Watford Road/Park Road.

### Site R3: Land South East of Shenley Hill, Radlett

- 6.77 The majority of comments received were not supportive of development on the site, with many responses addressing issues with R1 and R3 together; some also highlighted the cumulative impact on the Green Belt from the development of HEL214 (Land south of Theobald Street) and HEL218 (Organ Hall Farm). Loss of Green Belt was the focus of many objections, with development here considered to risk closing gaps between Radlett and surrounding settlements. It was stated that the Radlett Neighbourhood Plan survey identified keeping the Green Belt as the most important issue for local residents, and no special circumstances justifying releasing the site had been demonstrated.
- 6.78 Residents also highlighted the loss of and impact on open countryside, wildlife habitats, footpaths and bridleways, referring frequently to the health and wellbeing benefits of having open space so close by. The importance of retaining the site as open space in the context of climate change was also mentioned. Concern was also expressed about the implications of development for the site's status as a Local Wildlife Site and Regionally Important Geological Site (puddingstone).
- 6.79 Residents felt that additional housing development would adversely impact on what is considered to be a rural, tranquil village character. Further related objections were the likely increase in traffic congestion (and therefore reduction in air quality) in Radlett's constrained road system; narrow 'village like' roads and lack of public transport were mentioned frequently - giving rise to concerns about safety and environmental quality. The impact of additional traffic on Shenley Hill and Theobald Street, and knock on effects on Radlett Lane and Shenley (a route through to the M25) and Watling Street through the centre of Radlett were all raised. The location of the site access onto Radlett Lane was another cause for concern.
- 6.80 Additional pressure on strained infrastructure and services, including schools, health facilities and car parking, was also raised. There was also some objection to the potential

relocation of the Red House GP surgery to the site due to distance from the centre of Radlett and the busy road along which people would need to walk to access it if it moved. It was questioned whether this was a sustainable location for the proposed development particularly given poor access to public transport.

- 6.81 A response supporting the development argued that it could be incorporated into Radlett without affecting residents' enjoying of the surrounding countryside. However, others argued that the justification for so many new homes had not been demonstrated, including due to the use of out of date housing figures. Some commented that development should be directed to brownfield sites and/or sites within walking distance of services and amenities. Concerns about the impact of development on the adjoining primary school were also voiced.

#### **Statutory bodies, other organisations and development industry responding to R3**

<b>Organisation</b>	<b>Key point(s) made</b>
Aldenham PC	Site is a Regionally Important Geological Site and a Local Wildlife Site. Traffic impact concerns including access onto Radlett Lane. Contrary to objective of Radlett Neighbourhood Plan to protect Green Belt. Development does not meet the needs of the parish.  If site to be allocated, it should be for smaller number of homes and in line with RNP design guidance. Support extension of Newberries school but moving GP surgery unrealistic as it will be away from village centre and people will not walk to it.
Elstree and Borehamwood Green Belt Society	Oppose this development due to site being on Green Belt land, disruption to traffic flow which will cause traffic to drive through Shenley village, and the area being prone to flooding. Land could more usefully facilitate any required future expansion of Newberries Primary School to 3 forms entry or any required further relocation of the Red House Surgery should an alternative site in the centre of Radlett not be identified.
Fairfax Properties (site promoter)	As site promoter, support allocation and policy for the development of the site.
Herts Valleys Clinical Commissioning Group	Red House does not have capacity to meet needs arising from local plan; a reserve site for relocation has been identified. There will need to be ongoing planning between commissioner, provider and the local authority.
Hertfordshire County Council (Growth and Infrastructure)	Need to provide for Newberries Primary School to expand from 1fe to 2fe. Transport work to identify walking and cycling connections to local key destinations to be provided; justification for any through route to be provided, showing how the development would comply with national and LP policy. Biodiversity to be enhanced with impact on Local Wildlife Site to be avoided.
Radlett Society and Green Belt Association	Development would breach key Green Belt principle of preventing coalescence of communities; R3 makes significant moves towards Shenley. Development of the site has been rejected extensively in the past for many reasons including geology and access; no new justification to change this.
Shenley Parish Council	Concern about access on Radlett Lane. Vehicular link through site will increase traffic in Shenley as it will be easy route to by-pass Radlett centre. Increased burden on infrastructure and roads, loss of Green Belt, visual impact and lack of public transport.

## Site S1: Shenley Grange

- 6.82 The most commonly raised concern for residents was the increase in traffic, with many citing the unsuitable rural roads and the lack of interventions/improvements to the road network. Impact on the Green Belt was also an area of concern with many objecting in the context of the overall 'old part' of the village being removed from the Green Belt.
- 6.83 A number of other issues were raised including that it was too close to the Spinney Local Wildlife Site and other on-site habitat would be lost altogether, the fact that the access was too close to the Primary School, there was a severe lack of public transport serving the village and that it was too close to the conservation area, spoiling the historic core of Shenley.
- 6.84 Some responses reflected the view of the Parish Council regarding the number and density of homes; whilst acknowledging there would be more housing in the village and that this site was indicated in the Neighbourhood Plan as the most appropriate, the number of units and density was too high for a rural village. An independent report on local housing need in Shenley Parish, previously commissioned by the Parish Council, was also highlighted. Conversely, the promoter of the larger part of the site considered that the reduction in housing numbers from the initial estimate does not make good use of the site; the reduction in numbers due to primary school capacity was not considered to justify this and in doing so, submitted their own education assessment of school capacities.

### Statutory bodies, other organisations and development industry responding to S1

Organisation	Key point(s) made
Cala Homes (site promoter)	As site promoter, proposed allocation is supported but the site can deliver at least 180 dwellings, not 140. School capacity is not a constraint to development. Changes are needed to the concept diagram for which detailed comments were provided. Proposal has been broadly supported by the Parish Council and were it not for a procedural issue, the Shenley Grange site would have been allocated in the Shenley Neighbourhood Plan.
Hertfordshire County Council (Growth and Infrastructure)	Supporting text seeks to achieve off-site improvements to the public transport network but scale of development proposed on this site (and in the village more generally) will not realistically fund service improvements. The main bus service available currently is hourly and runs under contract to the county council.  A thin strip of Woodhall Spinney Local Wildlife Site is within the south-western boundary, for which protection and a buffer is needed. Would object to important LWSs being affected by development in the site.  Welcome the inclusion of extra care housing within these sites, as part of the growth of Shenley. Extra Care housing spread across the county will ensure residents can access appropriate housing close to existing connections.
Shenley Parish Council / Neighbourhood Plan Steering Group	If the site is to be developed, it should be retained in the Green Belt rather than re-designated which will lead to vulnerability to urban rather than rural density. AECOM report for Shenley NP identified the site as the most favourable for development; the justification still applies for multiple reasons which are provided.  The number of units, particularly for the Longview part of the site (100), is too high. Would again like to explore a Neighbourhood Development Order as it would enable the Parish Council, with community consent via a referendum, to give planning permission for an open rural development of around 220 homes (unconstrained) or less. Design needs to follow

Organisation	Key point(s) made
	neighbourhood plan vision rather than an interpretation by people who do not live in the village.

### Site SM1: South Mimms Growth Strategy

- 6.85 SM1 comprises four different parcels of land within the village, HEL228a, HEL228b and HEL320, on the north of St Albans Road and HEL385c, south of the road. Residents responding specifically to the policy commented on SM1 as a whole. However, clarity is sought over the individual site requirements.
- 6.86 Concerns were raised over South Mimms' Green Belt status and the scale of development proposed as it would have an undesirable transformational impact on the village, and could potentially result in coalescence with Bowmans Cross. Transport impact was highlighted as a particular concern with existing problems on Blackhorse Lane, Blanche Lane and St Albans Road likely to be worsened, and the proximity of the M25 likely to cause pollution and noise issues.
- 6.87 Representations on behalf of the promoter of two sites, on Greyhound Lane, which were not included in the draft plan, were received. Whilst supporting the principle of growth in the village, the submission challenged the site selection process and the basis for the omission of the two sites off Greyhound Lane. In doing, objections were raised to three of the four parcels within SM1.
- 6.88 Notwithstanding the objections received, a number of organisations responding acknowledged the opportunities which some growth in the village offered. Hertfordshire County Council, as highway authority, highlighted the scope to rationalise the existing highway infrastructure through the village. The inclusion of a village green and the potential for additional housing for the elderly and the disabled were seen as a positive by the parish council. The suggestion to create a wetland walk along the Catharine Bourne River was also welcomed by the Environment Agency, although the potential for flooding in this area was raised as an issue by the parish council.

### Statutory bodies, other organisations and development industry responding to SM1

Organisation	Key point(s) made
Beacon (Mimms) Ltd (site promoter)	Object to HEL228a as only around 5 dwellings can be accommodated on land outside of Flood Zone 3 and outside of green space identified to be retained. Object to HEL228b which relates poorly to existing village edge, would be detached development in highly exposed and visible area of land with no basis to create a new Green Belt boundary. Object to HEL385c as it is not clear if deliverability of site is supported by the landowner. Density of development is very low, potentially undermining any exceptional circumstances and concept diagram is extremely unclear. The site was also not recommended for further consideration in the Green Belt Review.
Hertfordshire County Council (Growth and Infrastructure)	Opportunity exists for the existing highway infrastructure through the village to be rationalised, questions are raised over these sites being defined as a strategic allocation.
Hertfordshire County Council (Property) (site promoter)	Support the provision of a new village green but consider the number of new homes the site could accommodate could be higher.
Shenley Parish Council	Cumulative transport impact on the B556 and wider Shenley area. Risk of future coalescence with Bowmans Cross.



Organisation	Key point(s) made
South Mimms Parish Council	<p>Support the provision of a new village green. Concerns over transport safety with access on St Albans Road and more details needed around how the expansion of St Giles school would be brought forward.</p> <p>Flood risk around Catherine Bourne and so require reassurance regarding larger parcel north east of St Albans Road. Concerned around smaller of the two parcels due to traffic safety issues; site should be incorporated into the main parcel so no new traffic is diverted onto Blackhorse Lane.</p> <p>Cecil Road north (HEL320) would be an excellent site for bungalows to provide accessing housing for elderly and disabled, given site is charity-owned.</p>

### **Site NS1: Land at Coursers Road, Bowmans Cross New Settlement**

- 6.89 Objections were received, in particular, from residents and organisations within London Colney and Colney Heath although there were some responses from within the borough, particularly in Shenley. A detailed response was submitted from St Albans City and District Council which whilst supportive of a plan providing for all of its housing and employment needs, raised significant concerns around the sustainability, suitability and impact of the Bowmans Cross site. The two local Parish Councils, in London Colney and Colney Heath, also submitted detailed objections.
- 6.90 The focus of representations from local residents was on the scale and size of Bowmans Cross and number of homes proposed, together with the significant loss of Green Belt, high quality landscape and good grade agricultural land. The use of out of date household projections was cited as a fundamental concern. A petition relating to the site was also submitted.
- 6.91 Representations emphasised that the site was not recommended for release in the Arup Green Belt report and that development would lead to the coalescence of London Colney and Colney Heath. The decision to allocate Bowmans Cross on the border of St Albans was seen as a political choice by one of the local organisations, Campaign for Colney, who also expressed dissatisfaction with the lack of a face-to-face consultation event.
- 6.92 Existing infrastructure stress was highlighted with secondary school, road network capacity (M25, A414, A1081, Bell Roundabout, Tollgate Road and Coursers Road) and health care provision being key areas of concern. The site was emphasised as being an unsuitable and unsustainable location for development due to its proximity next to the M25 (noise and air pollution concerns) and lack of proximity to public transport. Hertfordshire County Council, as highway authority, described the proposal as 'not currently' sustainable in terms of highways and transport.
- 6.93 The harm to wildlife and surrounding protected landscapes was expressed in many of the responses, including from wildlife and bird groups. In particular, the harm to the tree sparrow population, alongside many other protected species within an ecologically valuable landscape containing multiple designations, was emphasised. Calls were made to turn the area of land into a nature reserve and thereby relieve affected wildlife.
- 6.94 The phasing of mineral extraction, infilling and subsequent timed delivery of Bowmans Cross was said to be unrealistic and undeliverable. The Environment Agency submitted a detailed

response regarding the existing Environmental Permit at the site for landfill and waste disposal stating that this process is likely to extend beyond the end of the 15 year plan period, indicating the new settlement could not be delivered as proposed.

Organisation	Key point(s) made
Aldenham PC	The Parish Council cannot support the loss of Green Belt land based on out of date data
Barhale Plc (site promoter)	The key to the plan does not include all the annotations shown on the plan.
Campaign for Colney	<p>Object to the Local Plan in its entirety and specifically site NS1</p> <ul style="list-style-type: none"> <li>• loss of natural habitats,</li> <li>• a threat to wildlife,</li> <li>• harm to Green Belt, landscape, ecology and existing businesses.</li> </ul> <p>Brownfield land should be prioritised over Green Belt for development. The methodology used for the local housing requirement is not a target.</p>
Colney Heath Parish Council	Colney Heath Parish Council have not been contacted about expansion of Colney Heath Common into a nature reserve.
De Haviland Aircraft Museum	The Museum is concerned that the concept diagram does not acknowledge the heritage assets around Salisbury Hall.
Elstree and Borehamwood Town Council	Object to loss of Green Belt
Environment Agency	<p>Phasing of permits and timing of quarrying and landfilling works will continue beyond the end of 2032. This alongside the land restoration period, will mean that Bowmans Cross is undeliverable in plan period.</p> <p>Risk of air quality, odour and safety of new residents within 300m of anaerobic digester. Similarly, a 250m buffer is required around existing composting facility.</p> <p>Tyttenhangar Stream should be utilised as a blue connectivity corridor within the site between the Cobs Ash, Walsingham Wood and Redwell Wood SSSI sites through the development to Tyttenhangar Gravel Pits and the River Colne (a globally important chalk stream habitat).</p>
Hertfordshire County Council (Growth and Infrastructure)	Fundamental concerns regarding the capacity of highway network. The protection of existing habitats requires the designation of buffers. Redwell Wood SSSI and LWSs should be afforded appropriate protection and shown on the concept map. Provision for extra-care housing should be considered. HCC welcomes the opportunity to refine the IDP as the Local Plan approaches Submission. Three safeguarded waste management facilities are within the proposed allocation and are key to the strategic waste management network within the County. Extraction of mineral reserves started in 2008; planning permission for the sand and gravel workings expires on 31.12.2032.
Hertfordshire Natural History Society	The Bowmans Cross settlement poses an unacceptable threat to rare wildlife and biodiversity within and around the intended development area which includes the last colony of tree sparrows in Southeast England. The Society endorses the comments made by the Herts and Middlesex Wildlife Trust.
Herts Bird Club	Poses direct threat to the wildlife and biodiversity within and beyond the site. Concern about loss of habitat and in particular, population of tree sparrows, which is likely to be the last breeding colony in south east England. Significant number of other bird species of conservation concern

	<p>would be lost or threatened as would importance and diversity of the site for passage and migratory birds. Protected breeding birds would be adversely affected, as well as butterflies, insects, protected mammals and other animals.</p> <p>A nature reserve should be created to provide a safe and suitable place, managed in perpetuity, for displaced wildlife from any new development.</p> <p>The development needs scaling down to, at the very least, be restricted to areas south of Coursers Road. It is imperative that this reduction in scale is taken seriously as a key measure to preserve the site's biodiversity.</p>
Herts Middlesex and Wildlife Trust	The Bowmans Cross development does not accord with the Council's stated biodiversity strategy.
Herts Valleys CCG	Require further detailed information in order to provide specific details on required healthcare provision. A business case for a new healthcare facility on site, will need to be subject to agreement from the Commissioner.
London Colney Parish Council	The harm to the Green Belt is an overriding concern. Alternative options have not been fully articulated. The impact upon local medical facilities is likely to be adverse. The closure of Coursers Road is not justified.
National Highways	National Highways note the specific proposals for a new settlement to be created at Bowmans Cross, adjacent to junction 22 of the M25, comprising 2400 homes across the plan period. This development is of particular concern as the junction currently suffers from significant congestion at peak times and extensive mitigation will be required.
North Mymms District Green Belt Society	<p>Objection to Bowmans Cross:</p> <ul style="list-style-type: none"> <li>• the site is in the middle of the Metropolitan Green Belt;</li> <li>• it would cause significant harm to the Green Belt by preventing encroachment and coalescence;</li> <li>• there are significant wildlife sites in and adjacent to the site;</li> <li>• there is no Green Belt assessment to identify the exceptional circumstances required by the NPPF to justify release;</li> <li>• development would adversely impact existing service provision and infrastructure;</li> <li>• there is no evidence that the Council has met the Duty to Co-operate</li> </ul>
NW London RSPB Group	The land constitutes a beautiful and varied habitat for wildlife accessed by footpaths and bridleways; it is an important amenity used by locals and others. The area supports the last colony of breeding tree sparrows in the county.
Ramblers Association	The amenity value of the site must be judged on its restored condition. The loss of attractive open countryside is deplored. Clarification is required in regard to the definition of the Green Belt boundary and the site boundary.
Save Colney	The site provides a vital escape for people to enjoy nature. The wild open spaces will be lost to an urbanised environment destroying the area forever and decimating the Green Belt, placing a huge burden on surrounding settlements.
Save Tyttenhanger	Response was made via the template (see Appendix 2)
Severn Trent Green Power	Expressed concerns about the proximity of built development, including primary schools and a secondary school, to two existing waste sites, an anaerobic digester plant at Coursers Road and the Ridge in-vessel composting plant. These facilities are strategic waste management and recycling facilities and make an important contribution to the sustainable management of waste in Hertfordshire; they should be identified as constraints and considerations in the local plan; the draft Strategic Policy 2 of the emerging Waste Plan had sought to safeguard these facilities from

	development. Buffers of 250-500ms should be provided around these facilities to safeguard the community and community interface, with the least sensitive development located nearest to the waste facility. This accords with the “agent of change” principle referred to in the NPPF.
Shenley Parish Council/ Neighbourhood Plan Steering Group	1500/6000 homes would be in Shenley Parish. The loss of Green Belt is not supported.
South Mimms Parish Council	More detail of traffic calming and the access arrangements is required, especially in relation the volume of traffic envisaged for a new junction onto St Albans Road.
Sport England	Details of on-site sporting provision and off-site contributions are required in policy wording to avoid confusion. There should be specific requirements added in relation to sport.
St Albans City and District Council	<p>The site appears to be heavily dependent on road access and therefore M25; it has poor access to sustainable transport and one of the worst scores in the High Level Transport Assessment which is not considered to be adequately reflected in the site assessments or within the Sustainability Appraisal.</p> <p>Work still needs to be done to develop initiative solution to ensure the site is not car dependant with severe highway impact on adjacent strategic road network. At this stage, this lack of evidence is misleading; a transformational level of modal shift is required. Further work is required to demonstrate compliance with the latest version of the NPPF and the County Council’s LTP4.</p> <p>Allocation would result in the considerable narrowing of the Green Belt between Colney Heath and the new settlement; no understanding of exceptional circumstances required to justify site release.</p> <p>Unclear how the consultation reflects the Hertsmere Green Belt assessment or if relative Green Belt purposes contribution of the alternative development locations not considered. Coursers Road should form new Green Belt boundary with no new development to the north.</p> <p>Significant uncertainty about the length of time necessary to complete the mineral extraction, waste insertion, waste settlement and restoration processes (and the parallel waste permitting regime), prior to any construction.</p> <p>Potential development in this location would have a considerable infrastructure and services relationship with London Colney.</p>
Sworders (for Mr and Mrs R Monk, owner of HEL196) (site promoter)	There is an over reliance on one very large new settlement; this approach has not been supported at Examination elsewhere e.g. Uttlesford DC
Tarmac (site promoter)	The scale of employment land to be provided is considered too low; priority should be given to logistics given the proximity to the M25. Sterilisation of mineral reserves should be avoided.
Urban & Civic (site promoter)	Urban and Civic have extensive experience as a master developer on strategic sites and welcomes the opportunity to work with local authorities and other strategic partners to deliver much needed housing within a high equality environment.
Welwyn Hatfield Borough Council	Concerned regarding the choice of location and the level of supporting infrastructure required. Previous responses by the Council raised the implications for the A414.

## Other housing sites

### Borehamwood and Elstree

Site and summary of responses	Organisations responding	Key point(s) made by organisations
<p><b>HEL152, Lyndhurst Farm</b></p> <p>A small number of representations were received which commented specifically on this site. There was general support for/acceptance of development on the site as proposed in the draft local plan, on the provision that any new development would be similar in scale to the existing buildings, and that pedestrian and cycle routes were provided.</p> <p>The site promoter made representations that the whole site could accommodate a much larger number of homes than the 10 homes proposed in the draft Local Plan because the whole site should be considered to be previously developed land, and it is sustainably located on the edge of Borehamwood.</p>	<p>Elstree and Borehamwood Town Council (EBTC), Shenley Parish Council, Elstree and Borehamwood Green Belt Society (EBGBS)</p>	<p>Shenley Parish Council: do not object to the site but request assurances that the contamination and current non-conforming uses on the site will be effectively dealt with, the site will contribute towards enhanced pedestrian and cycle links on Green Street/Cowley Hill.</p> <p>EBTC: this site is within Shenley Parish, so should not be part of the Borehamwood housing figures. It provides an opportunity to remove unsightly, non-conforming Green Belt uses, would contribute to air, noise and light pollution, and impact on local infrastructure, being a distance from facilities (public transport, schools, GPs).</p> <p>EBGBS: Do not object to the site as it is PDL, providing unsightly non-conforming uses in the Green Belt are to be removed. This site is in Shenley Parish, not in Borehamwood so should not be included in numbers for Borehamwood. Future residents would use infrastructure in Borehamwood but local taxes would be paid to Shenley Parish Council.</p>
<p><b>HEL197 Land North of Barnet Lane, Elstree</b></p> <p>Concerns were raised about increased traffic congestion, pollution, noise and vibration from the railway line, and the existing public transport and cycle links are mentioned as needing improvements. The Green Belt, loss of green space and impact on the LWS, including light pollution, are also of concern, along with impacts on local services and a lack of local infrastructure.</p>	<p>Hertfordshire County Council (HCC), EBTC, EGBGS</p>	<p>HCC: Biodiversity offsetting / net gain would be expected on any undeveloped land lost to development. Adjacent to Elstree Tunnel Grasslands LWS, so advise an undeveloped buffer on the eastern side.</p> <p>EBTC: site is in the Green Belt and contains LWS and TPOs. There would be an impact on local infrastructure, and it is a distance from schools, GPs and public transport.</p> <p>EBGBS: The site is in the Green Belt and is a LWS. Development would cause increased pollution, noise and reduced light. Roads will be significantly impacted, in particular Deacons Hill Road and Barnet Lane. The proposed cycle and walking routes are unsuitable and there is a lack of public transport in this area.</p>

Site and summary of responses	Organisations responding	Key point(s) made by organisations
<p><b>HEL218 Organ Hall Farm, Borehamwood</b></p> <p>The main issues raised in relation to the site were loss of Green Belt, habitat destruction, potential coalescence of Borehamwood and Radlett, traffic congestion, distance from schools, rail station, GP health and care facilities, and the shopping and leisure facilities of Borehamwood town centre. Other issues mentioned by residents included that footpath 51 is well used, children’s use of the area for DofE activities, the potential for flooding and the importance of the area for mental wellbeing. The location next to the railway and overhead electricity lines was also raised as a potential issue. A petition relating to the site, as well as BE3 and the proposed Media Quarter, was also submitted.</p> <p>The site promoters provided a detailed submission supporting the allocation of the site for development.</p>	<p>EBTC, EBGBS, Griggs Homes (site promoter)</p>	<p>EBTC: object due to loss of Green Belt, habitat destruction, coalescence, traffic, effect on footpaths, distance from schools, rail station, GP health and care facilities, and the shopping and leisure facilities of Borehamwood town centre.</p> <p>EBGBS: object due to loss of Green Belt, habitat destruction, coalescence, traffic congestion, distance from schools, rail station, GP health and care facilities, and the shopping and leisure facilities of Borehamwood town centre.</p> <p>Woolf Bond: support allocation - for 170 dwellings.</p>
<p><b>HEL369 Well End Lodge, Well End, Borehamwood</b></p> <p>Representations request that building replace existing footprint and is not expanded for reason of Green Belt harm (coalescence), ecology harm and traffic increase. The location next to the scout hut is outlined as not ideal to have housing.</p> <p>A small number of responses were also received from residents in support of the proposed allocation.</p>	<p>EBGBS</p>	<p>EBGBS: Development in Shenley Parish; future local taxes would be paid to Shenley but use of Borehamwood infrastructure. However, no objection to site provided build form remains of size and situ as existing and pond is retained/improved.</p>

Site and summary of responses	Organisations responding	Key point(s) made by organisations
<p><b>HEL388 The Point Shenley Road, Borehamwood</b></p> <p>Development generally supported, provided it is not in excess of five storeys. Concerns expressed about high density flats coming forward. Retention of leisure uses is requested to ensure that Borehamwood high street remains of attraction. The site promoters submitted in support of development on the site with increased residential density and reduction in quantum of car parking and leisure uses to be provided.</p>	<p>EBTC, EGBGS, AEW Europe (site promoter)</p>	<p>EBTC: do not support the proposals, although this is a brownfield site, due to lack of detail on how the proposed number of dwellings might be achieved. Concern about impacts on the character of the town centre and on character and amenity of nearby residential areas. Important to see a cinema retained on the site.</p> <p>EGBGS: Confirmation required that the cinema will be retained. Support brownfield development if buildings are not above four/five storeys- as will have visual and residential impact. Parking to be retained.</p> <p>AEW Europe: support for proposed residential and parking development although a reduced level of leisure uses may be more realistic.</p>
<p><b>HEL601 Green Street, Borehamwood</b></p> <p>Only one site-specific comment has been received from a resident, which is in support of development on the site.</p>	<p>EGBGS</p>	<p>EGBGS: Require assurances that existing trees and hedgerows would be retained and enhanced for ecology and visual gain.</p>

## Elstree Village

Site and summary of responses	Organisations responding	Key point(s) made by organisations
<p><b>HEL212 Land off Watford, Elstree Village</b></p> <p>Concerns about loss of Green Belt, distance from Borehamwood town centre, the impact on local health and care services, traffic and air pollution arising from the development of the site were raised. It was also argued that the accommodation would be expensive and would not benefit local residents and that there was no need for another care home in Elstree village. Concern was also expressed about the future of the horse sanctuary, which is valued, and that bats are present on the site. On the other hand, HCC's Adult Care Services supported the proposed extra care development here.</p>	<p>HCC (Adult Care Services), EBTC, EBGBS; Retirement Villages (site promoter)</p>	<p>HCC ACS: support the development</p> <p>EBTC: Loss of Green Belt, distance from town centre, impact on health and care services, traffic, air pollution, won't benefit local residents; no evidence of need.</p> <p>EBGBS: loss of Green Belt, distance from town centre, no evidence of need for this type of accommodation - won't benefit local residents, impact on rural setting, impact on horse sanctuary.</p> <p>Retirement Villages: support for their proposal.</p>
<p><b>HEL274 Edgwarebury House Farm, Elstree Village</b></p> <p>Whilst concerns about the loss of Green Belt, impact on wildlife, need to retain Green Belt in the context of climate change and distance from Borehamwood town centre were expressed, there was also an acknowledgment that providing more homes here would be advantageous to Elstree village. HCC's Adult Care Services supported the proposed adult disability units although another commented that the need for these units should be demonstrated.</p>	<p>HCC (Adult Care Services), EBTC, EBGBS, HCC Property (site promoter)</p>	<p>HCC ACS: support the development.</p> <p>EBTC: loss of Green Belt, impact on wildlife, distance from town centre, evidence of need for adult disability units needed, but support additional homes in Elstree village.</p> <p>EBGBS: object due to loss of Green Belt, distance from town centre, (isolating for elderly).</p> <p>HCC (Property): support the development.</p>



## Potters Bar

Site and summary of responses	Organisations responding	Key point(s) made by organisations
<p><b>HEL162 Land south of Barnet Road, Potters Bar</b></p> <p>No individual residents' responses received</p>	<p>LB Enfield Property (site promoter)</p>	<p>LB Enfield (Property): Site contributes towards need to allocate at least 10% of housing on small sites. The optimisation of the site would help ensure the efficient use of land in line with NPPF Para. 124.</p>
<p><b>HEL177 Dove Lane, Potters Bar</b></p> <p>Representations received express concern regarding the suitability of this site for development due to close proximity to the M25; existing noise and air pollution levels on this site, made worse by development. Health concerns as a result of the pylons were also raised.</p> <p>The site is said to be subject to flooding with a brook running through the centre. It was highlighted that development on this site will cause harm to wildlife, traffic increase (Barnet Road and Dove Lane), increased pressure on insufficient existing infrastructure, subsidence of existing properties during construction, loss of historic woodland and visual harm. The loss of Green Belt is also raised, with concern centred on the coalescence of Potters Bar with London as a result of site release.</p>	<p>n/a</p>	<p>n/a</p>
<p><b>HEL216 Land west of Potters Bar station, Potters Bar</b></p> <p>The only brownfield site allocation in Potters Bar. Better to build an additional multi-storey car park in order to meet parking needs in area, instead of homes on this site.</p>	<p>n/a</p>	<p>n/a</p>

<p><b>HEL318 former Sunny Bank Primary School, Potters Bar</b></p> <p>Concerns raised regarding flooding and loss of playing fields on site. Harm to residential amenity of surrounding properties was mentioned with reference to loss of light, privacy and noise disturbance as a result of construction work. Objection to loss of the Green Belt as well as traffic increase to the local area. Suggested that the site should be integrated with allocation PB3.</p>	<p>Sport England, HCC Property (site promoter)</p>	<p>Sports England: Objection due to loss of the former school's playing field without any mitigation. Although the school is no longer in use, the playing field offers community benefit; contrary to para.99 of the Framework.</p> <p>HCC (Property): Support residential allocation however, would like element of site reserved for delivery of an SEND school. Housing target should be minimum, not maximum.</p>
<p><b>HEL375 Manor Road, Potters Bar</b></p> <p>Most representations cite concerns around impact of new homes in addition to allocation PB2. Increase in traffic along Manor Road and Darkes Lane, gives rise to safety concerns as well as increase air and noise pollution. Loss of open space, visual harm and pressure on school places as a result of the development also highlighted.</p> <p>Harm to wildlife and loss of a tree-lined street along Manor Road is referenced. New homes are said to be devalued as a result of the development, if it was to come forward, as well as increase in flooding.</p> <p>A few responses request the site is integrated with PB2, and support the proposal given its sustainable location, in close proximity to services, facilities and the station. Request density of new homes should be increased in such areas, with pedestrian links through the site, to the station provided.</p>	<p>King &amp; Co (site promoter)</p>	<p>King and Co: Advocates it being included within density zone 2 as it is highly accessible, and is cautious about the site-specific requirement regarding linkage between sites PB2, suggesting this should be strongly supported by the policy, but not an absolute requirement.</p>

## Bushey

Site and summary of responses	Organisations responding	Key point(s) made by organisations
<p><b>HEL175 Hartsbourne Country Club, Bushey</b></p> <p>Objection from Sport England because there is no requirement in the policy for a replacement clubhouse and other ancillary facilities to be provided.</p>	<p>Bushey Forum, Sport England</p>	<p>Bushey Forum: Already a planning application</p> <p>Sports England: Objection to smaller clubhouse facility with no needs assessment to justify reduction in size.</p>
<p><b>HEL235 Bushey Hall Garage, Bushey</b></p> <p>No individual responses received</p>	<p>n/a</p>	<p>n/a</p>
<p><b>HEL337b Land east of Farm Way (site 2), Bushey</b></p> <p>The concerns relating to this site mirror those relating to B2; loss of Green Belt and green space, harm to wildlife, flooding, traffic increase and impact to residential amenity of adjacent homes.</p>	<p>Bushey Forum, HCC</p>	<p>Bushey Forum: Should be added to B2 rather than being presented as a separate site.</p> <p>HCC Ecology: Adjacent / surrounded on three sides by 'Meadow N.W. of Tylers Farm' LWS, so advise undeveloped buffers on those sides.</p>
<p><b>HEL337c Land east of Farm Way (site 1), Bushey</b></p> <p>The concerns relating to this site mirror those relating to B2; loss of Green Belt and green space, harm to wildlife, flooding, traffic increase and impact to residential amenity of adjacent homes.</p>	<p>Bushey Forum, HCC</p>	<p>Bushey Forum: Should be added to B2 rather than being presented as a separate site.</p> <p>HCC Ecology: Adjacent to 'Meadow N.W. of Tylers Farm' LWS, so advise undeveloped buffer on eastern edge.</p>
<p><b>HEL386 Gravel allotments, Heathbourne Road, Bushey Heath</b></p> <p>No individual responses received</p>	<p>n/a</p>	<p>n/a</p>
<p><b>HEL502 Birchville Cottage, Heathbourne Road, Bushey Heath</b></p> <p>No individual responses received</p>	<p>n/a</p>	<p>n/a</p>

Site and summary of responses	Organisations responding	Key point(s) made by organisations
<p><b>HEL505 Greenacres, Heathbourne Road, Bushey Heath</b></p> <p>No individual responses received</p>	n/a	n/a
<p><b>HEL521 Bushey Hall Farm Site, Bushey Mill Lane, Bushey</b></p> <p>Significant number of responses from residents. Concerns focussed, in particular, on loss of Green Belt (causing coalescence of North Bushey and Watford) and access to open space. Traffic increase on Bushey Mill Lane and to the local area is also of key concern and said to bring increased air pollution. The use of a residential road to access the commercial aspect of the proposal is said unsuitable for commercial vehicles. This is linked to the unsustainable location of the site, implied to result in heightened car dependency. Concerns around the suitability of the site for development are also raised, with noise and light pollution concerns as a result of the proximity to the A41, M1 and A400. The site is said to be subject to flooding. Increased surface water runoff will contaminate the River Colne. Loss of good quality trees and harm to wildlife is also mentioned. Stress on existing infrastructure provision is cited as a concern, with particular reference to water stress and therefore over abstraction of the chalk aquifer, which will contaminate the River Colne.</p>	Bushey Forum	Bushey Forum: Located in a flood zone

## Radlett

Site and summary of responses	Organisations responding	Key point(s) made by organisations
<p><b>HEL214 Land South of Theobald Street, Radlett</b></p> <p>Particular concerns about the impact that this development would have on an already busy road and the access will be difficult for pedestrians and cyclists due to safety concerns. However, given the site's location, there are opportunities to improve pedestrian routes into the town centre. The area is prone to flooding and serves as a green corridor. The development of this land will result in the loss of Green Belt land and amenity space, increase coalescence with Borehamwood, and change the look and feel of the area. Concerns were also raised about the cumulative impact of development (214, R3, 218) in this location.</p>	<p>Aldenham PC, Richborough Estates (site promoter)</p>	<p>Aldenham PC: Coalescence with Borehamwood and cumulative impact with R3 and Organ Hall Farm.</p> <p>Richborough Estates: The site is readily deliverable without and would make a useful contribution early in the plan period, environmental/biodiversity improvements possible on land to the east.</p>
<p><b>HEL220 Porters Park Golf Club, Radlett</b></p> <p>Concerns that access will be from Shenley Hill (not Theobald Street) making access difficult and potentially dangerous. Comments were against the release of Green Belt land for development and further clarity is required in terms of what land will be released. Proximity to R3 means that the issues relating to this site will be compounded. The site is also considered to be prone to flooding.</p>	<p>Aldenham PC, Elstree and Borehamwood Green Belt Society (EBGBS), Sport England</p>	<p>Aldenham PC: very close to R3 and will compound issues.</p> <p>EBGBS: Opposite the site due to flooding, increased traffic and location as Green Belt site</p> <p>Sport England: object as there is no requirement in the policy or a replacement clubhouse and other ancillary facilities to be provided</p>
<p><b>HEL222 Cobden Hill, Radlett</b></p> <p>The development is considered to be back land development in the Green Belt which is out of keeping with the area. Allocation will also have a detrimental impact on congestion, pollution and local wildlife. The site is located within a conservation area and will impact upon the character and setting of heritage assets. It is noted that the access would be off Cobden Hill not Shenley Hill.</p>	<p>Aldenham PC</p>	<p>Aldenham PC: Whilst the Parish Council do not support this scheme it is more acceptable than other sites provided the right design concept is adopted.</p>

Site and summary of responses	Organisations responding	Key point(s) made by organisations
<p><b>HEL231 Starveacres, 16 Watford Road Radlett</b></p> <p>This site is supported by the Parish Council and identified in the Radlett Neighbourhood Plan.</p> <p>Concerns were raised about development within the Green Belt although it should be noted that this site is not within the GB and has been previously safeguarded for housing. The cumulative impact on Watford Road was raised given what is proposed at R1 and the recent apartment blocks that have been constructed nearby.</p>	<p>Aldenham PC, Phillips Planning Services Ltd (for Mr M Homan – site promoter)</p>	<p>Aldenham PC: Support the allocation. Proposals should consider opportunities to provide housing suitable for older people</p> <p>Phillips Planning Services Ltd: Support the allocation of their site and confirm it is not in the GB but is existing safeguarded housing land.</p>

## Shenley

Site and summary of responses	Organisations responding	Key point(s) made by organisations
<p><b>HEL390 land adjacent to 52 Harris Lane, Shenley</b></p> <p>This site received a relatively high number of comments for one of the smaller sites from local residents; it was also the subject of a separate petition. The main comments included concerns over what was seen as a very high density of development, doubling the number of houses on the road. There were also concerns over increased traffic down a rural road and associated safety issues this would have for children playing on the playing fields and the play area broadly opposite the access to the site.</p> <p>It was stated that the long distance rural views that can be seen from a relatively high point of the village would be lost was an issue for some residents and that the AECOM Green Belt Assessment did not recommend this area for removal from the Green Belt.</p> <p>Although most comments were from local residents, there were some other comments. Whilst making no comments on the site's merit, the prospective developers of S1 Shenley Grange felt it was unnecessary to release further land from the Green Belt when their site was being 'underused'. The density of the development and the natural beauty of the area being developed was also raised by the Parish Council/Neighbourhood Plan Steering Group who objected to the inclusion of this site.</p>	<p>Shenley Parish Council/Neighbourhood Steering Group, CALA Homes, Griggs Homes – site promoter, Sworders (for Mr and Mrs Monk, owners of HEL196)</p>	<p>Shenley Parish Council/Neighbourhood Steering Group: Strongly objection. Site is part of rural Shenley opening onto probably the most significant area of natural beauty in the Parish which there is a good argument to retain. Detailed grounds for objection listed.</p> <p>Sworders: Site would extend settlement boundary east instead of consolidating north and south. Site is very open resulting in prominent development site harming openness of Green Belt. Harris Lane has significant parking problems that constrain road width and will worsen congestion. Request that HEL 196 is reconsidered.</p> <p>Savills: Unclear as to why it is included with underuse of Shenley Grange. Restriction in capacity unevenly distributed as figure remains the same as in HELAA whereas the figure for Shenley Grange has been reduced. Aside from this, there should be no reason why both sites cannot be maintained with the efficient use of the Shenley Grange site, as no reason to limit growth due to school capacity.</p>

## Aldenham Villages

Site and summary of responses	Organisations responding	Key point(s) made by organisations
<p><b>HEL179 Hilfield Lane, Patchetts Green</b></p> <p>Development should be focused in the larger urban areas as there is little evidence to show that Patchetts Green can support any additional growth especially given the recent redevelopment of the equestrian centre. The promoter has confirmed that the site will be 100% affordable housing.</p>	<p>Aldenham Parish Council, Chartplan (site promoter)</p>	<p>Chartplan: 100% affordable housing “for locals and adjoining key workers in the immediate community”</p>
<p><b>HEL180 Kemprow, between White House and Adelaide Lodge</b></p> <p>Development should be focused in the larger urban areas as there is little evidence to show that Kemprow can support any additional growth. This will also reduce the gap with Radlett, especially if R1 comes forward.</p>	<p>n/a</p>	<p>n/a</p>
<p><b>HEL199 Land at Church Lane, Aldenham village</b></p> <p>Development should be focused in the larger urban areas as there is little evidence to show that Aldenham village can support any additional growth. The development will have detrimental impact on the conservation area.</p>	<p>n/a</p>	<p>n/a</p>
<p><b>HEL219/252 Pegmire Lane, Patchetts Green</b></p> <p>Development should be focused in the larger urban areas there is little evidence to show that Patchetts Green can support any additional growth especially given the recent development of the equestrian centre. Development will have detrimental impact on the conservation area. Reference also made to fact the nearby area would be blighted by any construction of a solar farm.</p>	<p>n/a</p>	<p>n/a</p>
<p><b>HEL345 Aldenham Glebe, Roundbush</b></p> <p>Consultees raised concerns over the loss of a key local business (Plants Direct Garden Centre) and the impact this development</p>	<p>Aldenham Parish Council</p>	<p>APC: Wide-spread dismay locally the site has been put forward by the St Albans Diocese. Will result in the loss of three long-establish businesses and negative impact Aldenham Road. Prefer to see site allocated for rural business use.</p>



Site and summary of responses	Organisations responding	Key point(s) made by organisations
<p>would have on the character of Round Bush and the conservation area. Development should be focused in the larger urban areas to show that Round Bush can support any additional growth.</p>		
<p><b>HEL509 Little Simpsons, Letchmore Heath</b></p> <p>Development should be focused in the larger urban areas. Letchmore Heath is already heavily congested as result of the traffic generated from school runs. The site would be car dependent and the local roads cannot cope with additional housing. Development would result in a significant increase in the size of the village, and have a negative impact on its character. Recent planning permission stipulated that the rest of the site remain in agricultural use. The promoter has stated that the site has capacity for 15 dwellings.</p>	<p>Letchmore Heath Village Trust, Cobstar Ltd (site promoter)</p>	<p>Letchmore Heath Village Trust: Significant increase in the size of the village, and have a negative impact on its character. Recent planning permission stipulated that the rest of the site remain in agricultural use.</p> <p>Apcar Smith Planning: Ample space within the site to provide 15 dwellings whilst retaining its wooded character.</p>

## Policies E1, E2 and E3 - Employment Land Supply

- 6.95 The key principles in these policies were supported by Hertfordshire Local Enterprise Partnership (LEP), neighbouring authorities, and site promoters as they clearly set out how Hertsmere intends to meet the needs of the local area and enhance/protect the principal employment locations within the borough. Nevertheless, specific questions were raised over the overall supply, the potential site allocations, cross boundary needs, affordable office space and the types of land uses promoted. The lack of a formal justification for the release of Green Belt land and the potential impact that this quantum of development will have on the environment, services, facilities and infrastructure were cited as a clear concern by residents and the CPRE.
- 6.96 Concerns were raised over the employment targets used as it was suggested they failed to consider the impact that Covid-19 and Brexit have had on the demand and supply of employment premises. Ecology, wildlife, climate change and other environmental impacts, were also referenced by a large number of consultees as particular issues that need to be re-addressed. However, HCC Ecology did state that suitable biodiversity offsetting / net gain arrangements would be expected on any undeveloped land including wildlife corridors and buffers.
- 6.97 Concerns were raised that proposals could lead to an imbalanced employment offer within Hertsmere, given the significant emphasis on the film and tv sector. Given the nature of this industry concerns were raised about the lack of local jobs, the impact on existing film and tv studios, and the additional traffic generated. Finally, the treatment of existing employment land and proposed development within the Green Belt raised concerns. Site promoters questioned whether the current approach for keeping certain employment development within the Green Belt (policy GB3) was undermining these new employment policies and the main purposes of the Green Belt.

### Policies E1, E2 and E3: Summary of responses from statutory bodies, other organisations and development industry

Organisation	Site promoted	Key point(s) made
Aldenham Estate	n/a	The Estate welcomes the employment aspiration. Our farmsteads have the ability to make a significant contribution to a range of employment needs from purpose-built flexible office space to smaller storage and light industrial.
CellNex	n/a	Strengthen the links to other policies in the plan that require the provision of infrastructure, including digital connectivity, which will support the local community and future employment uses.
CPRE	n/a	The employment targets fail to consider the implications of Brexit and Covid. There is no justification for speculative growth and the amount of GB release suggested. A more up to date economic study is required. Hertsmere has a strong and competitive local economy with a low unemployment rate so how much benefit will additional employment provide.
Dacorum BC	n/a	Support the plan's commitment to identify designated employment land to serve all identified future needs up to 2038.
DLA Town Planning of behalf of unnamed landowners of land adj Elstree Road, A41 and Dagger Lane (HEL238)	HEL238 (not in plan)	Support the release of Green Belt land for employment purposes however do not consider there to be a suitable provision of allocated sites to meet the forecasted growth in occupier demand.

Organisation	Site promoted	Key point(s) made
Hertfordshire LEP	n/a	Support the proactive approach taken to protecting and enhancing the employment offer within Hertsmere and the range of uses being accommodated.
Hertfordshire County Council (Growth and Infrastructure)	n/a	Suitable protocols, including wildlife buffers, will be required to protect LWS and LNRs from development and biodiversity offsetting / net gain will be expected.
LB Enfield	n/a	The amount of employment development proposed exceeds the identified need within Hertsmere. LB Enfield would welcome discussions about employment capacity and the potential for meeting some of Enfield's identified need.
Lowerland (2004) Ltd	HEL503 Land adjoining Lismirrane Industrial Estate	Supports the inclusion of HEL503 and the range of land uses proposed. Proposals for development which attract commercial investment, maintains economic competitiveness and provides employment and training opportunities for the local community are supported. It is queried why, given that the Council consider exceptional circumstances exist, that HEL503 hasn't also been removed from the Green Belt.
Regen Properties	HEL816 Mercure Hotel	Welcomes the inclusion of the HEL816 as a Main Employment Area under policy E2. Supports policies E1-E3 which set the expectation for the Tylers Way Main Employment Area. However, concerns are raised over the Green Belt designation across the Site, as set out in Policy GB3, as this appears to risk undermining the objectives of Policies E1-E3.
Tarmac	HEL511a and HEL511b	The lack of employment land proposed at Bowmans Cross is a concern, given that there is an opportunity to provide strong logistics support in this key area of the M25 Corridor. A number of the new employment site allocations made under Policy E2 are unlikely to be deliverable. The Local Plan fails to allocate sufficient land to meet its future employment needs.
Three Rivers BC	n/a	Support Hertsmere's approach to meeting its employment needs in full and to protecting existing employment areas given the strategic need for employment land across South West Herts and the changes to national planning controls over commercial uses.
Transport for London	As a landowner also promoting HEL204 Land at Stangate Crescent and Wansford Park	TfL are freeholders of HEL503 and support the sites inclusion as an extension of the existing employment area.
Truveya (formally TLC Group)	B4 Heathbourne Green, Bushey Heath	Greater clarification required over 40% affordable office space. B4 will potentially include the provision of a vocational training facility alongside apprenticeships and onsite jobs.
Urban & Civic	Bowmans Cross	U&C support the aims of Policy E1. Bowmans Cross will include circa 15,000 sqm of employment space as part of a sustainable mix of uses.

#### Policy E4 - South Mimms Service Area – Special Policy Area

6.95 The Hertfordshire LEP supports the approach taken in designating this area. However, the CPRE questioned the need to expand this facility given the shifting national position and the

increased emphasis on climate change, sustainable transport and working from home. Hertfordshire County Council noted that evidence of biodiversity offsetting / net gain would be required when developing this site along with suitable measures to protect the Local Wildlife Site on the western boundary of this site.

**Policy E4: Summary of responses from statutory bodies, other organisations and development industry**

Organisation	Site promoted	Key point(s) made
CPRE	n/a	The expansion of South Mimms Services into the GB should be reconsidered given the climate crisis, post-pandemic situation, and emphasis on sustainable transport solutions.
Hertfordshire County Council (Growth and Infrastructure)	n/a	If semi-natural habitats are affected biodiversity offsetting / net gain would be needed. Objection will be raised if development results in an important LWSs being affected.
Hertfordshire LEP	n/a	Entirely appropriate policy approach
Carter Jonas	HEL600 Charleston Paddocks, South Mimms Services	The confirmation within this text that the site can be brought forward for alternative employment-related land uses is welcomed. However, it should be noted that current evidence from National Highways shows that site is no longer required for 'activities relating to the management, operation and maintenance of the strategic road network'. This should be reflected within the policy.

**Policy E5 - Elstree Aerodrome – Special Policy Area**

- 6.96 The general principles set out within this policy were supported by the majority of consultees including residents, site promoters, Elstree and Borehamwood Green Belt society and stakeholders. In particular, Sports England and the Hertfordshire LEP recognise the importance of having facilities available for recreational flying and training.
- 6.97 The principal concern raised relates to the area designated for the aerodrome and its potential for expansion. Residents, Aldenham Parish Council and the Elstree and Borehamwood Green Belt Association requested that the two fields to the North East of the site, which are considered to be outside of the recognised boundary, are removed from the allocation so that that this land cannot be developed or used for aviation purposes.

**Policy E5: Summary of responses from statutory bodies, other organisations and development industry**

Organisation	Site promoted	Key point(s) made
Aldenham Estate	Various within the estate	The Estate welcomes the draft Local Plan Policy Map identifying the boundary of the licensed area of the Aerodrome. Clarification is required over the identified envelope (the runway and land to the south).
Aldenham PC	n/a	APC fully supports the Aerodrome. However, a smaller allocation is requested to ensure that development does not encroach on the Green Belt, without appropriate planning consent and justification.
CPRE	n/a	The expansion of the aerodrome into the Green Belt should be reconsidered given the post pandemic situation, the climate crisis, and the need to reduce unsustainable travel.
Hertfordshire County Council (Growth and Infrastructure)	n/a	Biodiversity offsetting / net gain would be expected on any undeveloped land lost to development. Adjacent to the sites is Hilfield Park Reservoir LNR, LWS and HMWT nature reserve, undeveloped buffer on southern edge would be advised.

Organisation	Site promoted	Key point(s) made
Elstree and Borehamwood Green Belt Society	n/a	Support the development at Elstree Aerodrome, to enhance and improve future provision at the site, provided that development adheres to all the proposed safeguards and does not result in the development of Green Belt to extend the existing runway.
Elstree and Borehamwood Town Council	n/a	Supports the expansion of the airport within its existing site. The two fields in the northern corner of the site should not be included, as they have never been used by the aerodrome and would result in the loss of additional Green Belt.
Hertfordshire LEP	n/a	Herts LEP considers this a welcome policy, as it will help to address local skills deficits in this sector.
Lowerland (2004) Ltd	HEL503 Land adjoining Lismirrane Industrial Estate	Greater flexibility is required in Policy E7 so that it takes into account the varying circumstances and constraints of potential employment developments.
Sport England	n/a	General support is given to this policy provided that it fully recognises the importance of the aerodrome for recreational light aircraft flying, which is a recognised sport.

### Policy E6 – Media Quarter Borehamwood – Special Policy Area

- 6.98 The site generated most representations out of all of the employment sites proposed in the draft plan. Hertfordshire LEP support the proposed media quarter as it will ensure that Borehamwood becomes the centre of the most important film cluster in the UK. The proactive approach of identifying land specifically for the film and tv industry was welcomed as it would allow for further sector consolidation and expansion to happen.
- 6.99 However, the majority of comments by residents and resident groups (including Elstree and Borehamwood Green Belt Association and Shenley Neighbourhood Plan Steering Group) were opposed to this proposal as it would result in the loss of Green Belt land with no apparent benefit due to the lack of permanent local jobs and investment in community facilities. A petition relating to the site, as well as BE3 and Organ Hall Farm, was also submitted.
- 6.100 Concerns were raised over the potential impact on the character of Well End, the health and wellbeing of residents, the road network, the ecology and biodiversity, the equestrian facility at Strangeways Farm Stables, the surrounding open space and the existing infrastructure and services. The impact on the existing Elstree Studios and Elstree Screen Arts Academy (ESA) was also highlighted with a number of specific concerns and questions raised in the response from the ESA around the demand, funding and government support for the proposed college facility in the Media Quarter. The college facility was identified in the draft policy as an extension to ESA, based on the site promotion received for this part of the Media Quarter. ESA raised concerns that the promoters of the original land promotion (received following the Council’s employment land call for sites in 2021) did not consult ESA and that any new provision appeared to replicate the offer at ESA. A number of residents also questioned the impact on the existing ESA site on Elstree Way.
- 6.101 Concerns were also raised due to the issues associated with the construction of Sky Elstree, and whether the demand exists for additional facilities given the amount of studios within the area. Furthermore, residents raised concerns over the quality of the public engagement on this site and the Local Plan and there was no guarantee that these sites would come forward for the uses currently proposed.

**Policies E6: Summary of responses from statutory bodies, other organisations and development industry**

<b>Organisation</b>	<b>Site promoted</b>	<b>Key point(s) made</b>
CPRE	n/a	No justification is provided for the release of Green Belt land in Borehamwood for the film and tv sector.
DLA Town Planning of behalf of unnamed landowner of land adj Elstree Road, A41 and Dagger Lane (HEL238)	HEL238	Considerable doubts whether this allocation will meet all forms of occupier demand set out in the 2019 Economic Study.
Elstree and Borehamwood Green Belt Society	n/a	Prime Green Belt land with beautiful views and walks, prized by the local community. Loss of a valued equestrian facility and huge impact on the local road network. The demand for such a huge complex has not been proved and won't bring many local jobs.
Elstree and Borehamwood Town Council	n/a	Residents are horrified at these proposals. These proposals give the impression that this is a foregone conclusion whereas they are simply aspirational.
Elstree Screen Arts Academy	n/a	We have never formally consulted regarding this proposal. Nothing has been presented in writing and there is (as yet) no detail regarding funding or contract / MoU for a cohesive training offer. The Hertfordshire LEA school planning team make no reference to this new facility.
Environment Agency	n/a	Recommend inclusion of the Mimmshall Brook and the Rowley Lane Drain as opportunity areas for Biodiversity Net gain within the environmental and compensatory Green Belt improvements section of this policy
Gilston Investments (owner of Wrotham Park Estates)	BE3 Land east of Cowley Hill	The allocation will result in the creation of a world leading film studio complex, delivering significant economic, social and environmental benefits.
Hertfordshire LEP	n/a	The proposals address the specific locational requirements of different sectors as per the NPPF and builds on the strong historic evidence of the Film and TV industry expansion. Borehamwood seems certain to be at the epicentre of the most important film cluster in the UK.
Ramblers Hertfordshire & North Middlesex Area	n/a	Not opposed to the allocation provided significant upgrades to existing footpaths and bridleways are included to open up the possibility of active travel routes to Arkley and South Mimms.
RRHE	Land North of Doubletree Hotel, Borehawood – Site D)	Has the potential to negatively impact the commerciality of the RRHE site due to current wording of draft Policy. It is ambiguous in what should and should not be permitted on the HHRE site and therefore fails to comply with paragraph 16 of the NPPF. It also conflicts with the current safeguarding designation which is designed to preserve the long-term employment potential for this non-Green Belt site.
Shenley PC/Neighbourhood Plan Steering Group	n/a	Proposals will have an unsustainable impact (traffic, character) on Well End and Shenley due to the over-powering nature of the development. The proposals appear to be aspirational with little evidence to establish an actual demand and suitability of the proposed site. The proposal will increase competition and result in the loss of a very popular equestrian centre.
Strangeways Farm	n/a	Strangeways is the biggest stables in Hertfordshire, serving this area as well as North London. Over 200 horses are stabled there and there is a severe deficiency of stabling

Organisation	Site promoted	Key point(s) made
		locally. The Green Belt should not be built on for a Media Quarter.
Three Rivers DC	n/a	Enhancement of creative industries in South West Herts is encouraged. Sustainable transport modes to and from the Media Quarter Borehamwood will be required.

### Policies E7, E8, E9 and E10 – The Local Economy

- 6.102 The responses received supported the principles for creating flexible employment space and requiring employment skills plan. However, it was suggested that suitable provision needed to be made for employment development with rural areas. Questions were also raised by site promoters and businesses over the evidential basis for the affordable office space and local labour requirements, as required by Policy E7 (A flexible local economy), as this will likely impact on the feasibility and viability schemes. Furthermore, it was considered the policies did not reflect the fact that the majority of commercial development is constructed with a specific end user in mind.
- 6.103 Hertfordshire LEP supported these policies and welcomed the opportunity to provide additional evidence. Policies that facilitate local and home working, support enterprise local training and education opportunities were all supported in principle by site promoters and businesses. It was emphasised that there will need to be suitable support through infrastructure improvements including full fibre connectivity. Policy E8 (Promoting of the film and television industry) was generally supported though significant concerns have been raised in relation to the proposed new media and additional Green Belt release.

### Policies E7, E8, and E9: Summary of responses from statutory bodies, other organisations and development industry

Organisation	Site promoted	Key point(s) made
AEW Europe	N/a	We are in support of the general aims and principles of the policy E9. However, to enable the effective use of land at The Point amendments should be made for up to 230 homes with commercial uses that are better suited to the site than current uses.
Barhale Plc	n/a	The justification for policy E7 and its objectives need to be revised, as they are currently too onerous and fail to reflect the fact these types of schemes are often for a specific end user.
Churchill Retirement Living and McCarthy and Stone (joint submission)	n/a	U&C supports the aims of Policy E8 and Policy E10. Bowmans Cross is at the centre of Hertfordshire LEP's identified economic innovation ecosystems.
CPRE	n/a	References to the Media Quarter proposal should be removed from Policy E8. The policy would effectively facilitate any media related development sought by the developer and users of the land without taking into account any impacts on the Green Belt.
Hertfordshire County Council (Growth and Infrastructure)	n/a	Access to broadband is a vital component of infrastructure in today's world and it is key to growing a sustainable local economy, vital for education and home working and an increasingly central part of community cohesion and resilience.
Hertfordshire LEP	n/a	Support policy E8 as it observes that film and TV studios operate in a relatively sensitive local environment. Policy E9

Organisation	Site promoted	Key point(s) made
		is a key policy which seeks to respond to changing ways of doing business whilst at the same time setting down a range of initiatives to protect locally based employees and SMEs.
St Albans City and District Council	n/a	Proposals which assist and grow the provision of employment opportunities in the key Hertfordshire tv and film sector, are generally supported.
Home Builders Federation	n/a	Whilst the HBF understands that the Council wishes to improve opportunities for the residents to Hertsmere to enter the construction industry it is not clear how this is considered to be justified against the tests set out in paragraph 57 of the NPPF and regulation 122 of the CIL Regulations.
Masonic Charitable Foundation	B2, Compass Park, Bushey	Compass Park can contribute to supporting the local economy in Bushey and in particular by creating new employment opportunities within the Garden Community, including start-up businesses and SMEs.
Transport for London	As a landowner also promoting HEL204 Land at Stangate Crescent and Wansford Park	Whilst a minimum of 25% all jobs created by the development being specifically targeted at local residents is a worthwhile policy aspiration, it is likely to be difficult to achieve and deliver.
Truveya (formally TLC Group)	B4 Heathbourne Green, Bushey Heath	There does not appear to be any policy basis, or indeed evidential basis, for requiring all large-scale developments to support small and medium enterprises.
U&C		U&C supports the ambition for larger, strategic housing allocations to provide flexible workspace. This aligns with the approach being taken on Bowmans Cross.

#### **Policies GB1, GB2, GB3 and GB4 – Green Belt**

- 6.104 The majority of responses in relation to this section of the draft Local Plan were in response to Policy GB1, the overarching policy setting out the presumption against inappropriate development within the Green Belt. Although Policy GB1 was not specifically concerned with Green Belt boundary changes or land allocations, concerns were expressed by many of those responding over the level of Green Belt release, level of growth and justification in terms of housing need. Responses from the general public also focussed on the loss of green space for walking and leisure, the impact on the character of the area and for environmental and climate change mitigation implications.
- 6.105 In terms of the approach to meeting housing needs, CPRE were critical in their analysis of the general approach to the Green Belt, stating that the chapter mainly comprised policies and proposals to develop in the Green Belt, rather than protect it.
- 6.106 Many of the responses received, in relation to both Green Belt policies and other parts of the draft plan, referenced data provided the CPRE, drawing on an initial analysis of the draft plan published by CPRE Hertfordshire a week after the public engagement was launched in October. The initial CPRE analysis contained some inaccurate figures in relation to the area of Green Belt land proposed for re-designation (over 30% more than the actual area proposed and overstating the area proposed for housing by 350 hectares) including areas of land within strategic sites proposed for retention within the Green Belt. This was drawn to the attention of the CPRE at the time but it is unclear when or where the changes were made and the initial analysis remains on its website. An updated and more



accurate analysis, dated 22 December 2021, appears to have been published after the end of the public engagement period.

- 6.107 There was support from both Sport England and the Ramblers Association for Policy GB2 (Compensatory Green Belt improvements) and the increased opportunities to access the countryside. Sport England also support the flexibility provided by the Key Green Belt sites policy GB3, specifically for the improvement and expansion of sports facilities such as at the school sites. However, other stakeholders with an operational interest in Green Belt had differing views on the status of their sites. For example, Blackbirds Sewage Treatment Works argued the case that although they were included as a Key Green Belt Site presently, they should not be within the Green Belt at all.
- 6.108 A number of schools located within the Green Belt also submitted responses to the draft plan. A submission on behalf of the Aldenham Foundation (Aldenham School) considered that the draft policy was unsound emphasising that the school considers the infill envelope to be unduly constraining; the representation reflected the submissions made on behalf of the school on the current local plan. Until a rational 'Development Envelope' is defined, it was suggested the draft policy remains contrary to National policy, is 'unsound' and should be deleted. The De Havilland Aircraft Museum, due to its size and importance both for employment and historical significance, considered it should be included as a Key Green Belt Site.
- 6.109 Site promoters questioned whether the current approach for keeping certain employment development within the Green Belt (policy GB3) was undermining these new employment policies and the main purposes of the Green Belt. Policy GB4 (Development standards in the Green Belt) is a detailed policy setting out a range of criteria for assessing applications in the Green Belt, often on sites with some existing development. A limited number of responses covered this policy with two of those submissions stating that unimplemented permitted development rights and the 'fallback' position should be taken into account when determining applications. It was also suggested that the policy does not reflect all of the categories of development which are not judged to be inappropriate, as set out in the NPPF.

**Policies GB1, GB2, GB3 and GB4: Summary of responses from statutory bodies, other organisations and development industry**

Organisation	Site promoted	Key point(s) made
Aldenham Foundation	Aldenham School	Until a rational 'Development Envelope' is defined, the draft policy remains contrary to National policy, is 'unsound' and therefore should be deleted
Aldenham PC	As landowner also promoting HEL386 Gravel allotments, Heathbourne Road, Bushey Heath HEL219/252 Pegmire Lane Patchetts Green	GB1- Green Belt is an irreplaceable and valuable asset and should be protected at all costs. Present policy deems development in Green Belt inappropriate. This is a concerted attack on the Green Belt and should be resisted. Sites chosen contrary to GB1 due to the scale and are not sympathetic to surroundings – release should be kept to smaller sites.  Whilst understanding local position of high targets and large amount of Green Belt, local authority is not taking a robust approach to the issue.
Arsenal FC	Arsenal FC Training Ground, London Colney	Arsenal FC are supportive in principle of the proposed designations for the Arsenal Training Ground at London Colney, 'Key Green Belt site' and 'Key Green Belt site development envelope'. However, amendments are sought to Policy GB3 for soundness to reflect that certain outdoor

Organisation	Site promoted	Key point(s) made
		sports and associated facilities may be permitted within the wider boundary of the Key Green Belt Site to reflect unique circumstances of the subject site.
Barhale Plc	Tarmac Land south of M25 HEL159a and north of Bell Lane/Salisbury Hall HEL159b	Ability to provide compensatory improvements outside of proposed new settlement is supported. Owner is prepared to provide improvements as set out under ENV3 including enhanced landscape, improved access to countryside and green infrastructure including biodiversity.
Beacon (Mimms) Ltd)	HEL173 and HEL516 Greyhound Lane, South Mimms	Draft policy GB1 requires NPPF compliance and sets out standards, therefore, policy GB4 is considered unnecessary and should be deleted. For example, criteria in 1 <sup>st</sup> paragraph may relate to factors around purpose and openness, but more so to landscape quality, character and visual amenity and these are controlled by other policies such as ENV4, ENV7 and DL2.
Cala Homes	S1 Shenley Grange	Draft policy GB1 requires NPPF compliance and sets out standards, therefore, policy GB4 is considered unnecessary and should be deleted. For example, criteria in 1 <sup>st</sup> paragraph may relate to factors around purpose and openness, but more so to landscape quality, character and visual amenity and these are controlled by other policies such as ENV4, ENV7 and DL2.
CPRE	n/a	GB3 Proposes a large number of developed sites which would facilitate inappropriate development in the Green Belt. Small scale building or extension may be appropriate in some instances and the plan should include a policy setting out criteria for them requiring demonstration of very special circumstances. Point i) refers to proposals not having a greater adverse impact of openness of the Green Belt and the purpose of including the land within it - there are 5 defined Green Belt purposes however, and all should apply. A criteria based policy should apply to the whole of every key site. Any envelope should be drawn tightly around the area and if extending into the Green Belt, very special circumstances should be stated in the draft plan.
De Havilland Aircraft Museum	De Havilland Aircraft Museum	As a way of managing any potential policy conflict between Policies LF1 and LF2 and Green Belt policy, it would seem sensible to include the de Havilland Aircraft Museum as a Key Green Belt Site, as defined in Policy GB3.  Site is larger than at least two of the envelopes around other Key Green Belt Sites (Watford FC and Bhaktivedanta Manor).
Cala Homes	S1 Shenley Grange	Draft policy GB1 requires NPPF compliance and sets out standards, therefore, policy GB4 is considered unnecessary and should be deleted. For example, criteria in 1 <sup>st</sup> paragraph may relate to factors around purpose and openness, but more so to landscape quality, character and visual amenity and these are controlled by other policies such as ENV4, ENV7 and DL2.
Environment Agency	n/a	In the supporting text on page 139 Compensatory Green Belt improvements, reference should be made to improvements to blue infrastructure within the Green Belt.
Griggs Homes	HEL218 Organ Hall Farm, Borehamwood	Policy GB2 broadly in line with paragraph 142 of NPPF in terms of seeking compensatory improvements to land remaining in the Green Belt. In the context of HEL218, we

Organisation	Site promoted	Key point(s) made
	HEL390 Land adj to Harris Lane, Shenley,	note proposal to retain northern part in Green Belt. This is supported and improvements such as biodiversity, additional landscaping and recreational access. May want to consider Watford's approach on this matter for sites to be removed in their entirety, for or in addition to criteria i to iv.
Hertfordshire County Council (Growth and Infrastructure)	n/a	The Local Plan identifies multiple education sites as Key Green Belt sites. However, the allocation of the new proposed secondary school site in Borehamwood as a key green belt site is of concern to the county council, as the policy states development would only be permitted where it would not have a greater impact on the Green Belt than the existing development. Further discussion is required on this matter to assist the soundness of future iterations of the plan.
Hertfordshire County Council (property)	Various including HEL385c, Popes Farm, HEL274 Edgwarebury House Farm, HEL318 Former Sunnybank Primary School	Welcome proposed allocation and removal of sites HEL274, 318 AND 385c from the Green Belt. The extent and allocations of ownerships will enable sufficient compensatory improvements to be delivered. Current approach of not allowing compensatory improvements within the development allocation is considered inflexible as the most suitable place may be on the edge of allocation providing a transition area.
Kemp Place Residents Association	n/a	Appalled to think we may be losing our valuable Green Belt. None of this was indicated in 2018/19 and our infrastructure is not fit for purpose now.
Lichfields for Immanuel College	Immanuel College	Immanuel College should be designated as a Key Green Belt Site, or equivalent. It should not be treated differently to other schools such as Aldenham School or Haberdashers' Aske's Boys' School.
Lowerland (2004) Ltd	HEL503 Land adjoining Lismirrane Industrial Estate	Given that the Council consider exceptional circumstances exist and HEL503 benefits from an employment allocation under Policy E2 unclear why it hasn't also been removed from the Green Belt.
Regen Properties	HEL816 Mercure Hotel	Concerns are raised over the Green Belt designation across the Site, as set out in Policy GB3, as this appears to risk undermining the objectives of Policies E1-E3.
Oxhey Lane Developments Ltd	HEL357, Oxhey Lane	Policy GB2 requires that any arrangement to secure the use of part or all of the land for community use is in perpetuity. This suggested wording needs to clarify what exactly is being described as being 'not'; needs to be tighter and less superfluous.
Purcell School	n/a	Policy seeks to introduce unnecessary additional criteria to the national policy in paragraph 149 of the NPPF. In relation to Key Green Belt Sites, on many occasions housing can be a suitable reuse for a KGBS, such as International University site. A rational Green Belt boundary has not been proposed.
Shenley PC/Neighbourhood Plan Steering Group	n/a	
Sport England	n/a	Support Policy GB3 as it would provide flexibility for schools and sports clubs to provide new and enhanced facilities. Requirement for proposals to have no significant adverse impact on sports and leisure also welcomed.

Organisation	Site promoted	Key point(s) made
St Margaret's School	St Margaret's School	Support allocation of the School as a Key Green Belt site. However, to recognise the importance of the school and its contribution to the local economy, it should either be removed in its entirety from the Green Belt with a proposed new boundary along Merry Hill or there should be a larger infilling area to enable the Schools growth.
Thames Water	n/a	Policy GB3 allows for proposals for infilling or redevelopment where they are ancillary or support an established use where these are designated as "Key Green Belt Sites". Designation doesn't clearly align with national policy in NPPF. Blackbirds SWT should be considered to be removed from the Green Belt completely.
Truveya (formally TLC Group)	B4 Heathbourne Green, Bushey Heath	GB2- Compensatory Green Belt Improvements: Approach in accordance with NPPF but lacks details of how impacts can be offset and supporting text too wide. Provision should be made to secure enhancements of areas of open space within proposed strategic allocation site for public previously in Green Belt.
Urban & Civic	NS1 Bowmans Cross	Support principle of Policy GB4. Suggests that consideration needs to be given to the list of principles to be applied to development in the Green Belt. As an example, delivering necessary utilities and infrastructure, may, by their definition, require a location away from other buildings.
Veladail Leisure Ltd	Bushey Hall Golf Club	Policy GB2 requires that any arrangement to secure the use of part or all of the land for community use is in perpetuity. Would unnecessarily restrict any evolution of the site in the future and the ability to deliver additional or different uses on sites to reinforce the sustainable credentials and ensure continued need and viability of the site is maintained. This sentence of the draft policy should be deleted.

### Policies CC1, CC2, CC3 and CC4 – Climate Change

- 6.110 Although climate change concerns were a theme in many of the overall responses to the plan, relatively few submissions commented specifically on the climate change section of the plan. There was general in-principle support for the draft policies in the plan although the CPRE submission, in particular, robustly argued that the climate change policies in the plan were inadequate and that the emphasis on development to the exclusion of all other aspect of climate change and carbon reduction should render the DHL P unsound.
- 6.111 Specific concerns were expressed regarding the terminology used in Policy CC2, for example, in relation to the precise definition and meaning of operational and embodied carbon dioxide and carbon offsetting. In addition, the deliverability of net zero and water neutrality was also questioned. A number of developers also queried the overall impact of the climate change policies upon the viability of emerging draft site allocations and the cumulative effects upon the viability of the Local Plan as whole. The absence of viability evidence during the consultation period at Regulation 18 was highlighted. The need to acknowledge new Building Regulations effective from June 2022 and concerns that Policies CC2 exceeded what is currently required by national planning policy were also stated.
- 6.112 Responses from the general public highlighted the practical challenges of retrofitting the existing building stock to mitigate climate change. Responses also queried the concept of water neutrality, the emerging energy deficit at national level, the efficacy of carbon

offsetting, localised flooding issues and the absence of a sustainable transport strategy for the borough. Residents also expressed strong reservations regarding the scale of planned growth and the loss of Green Belt land which they consider will undermine the aspirations set out within this Chapter.

**Policies CC1, CC2, CC3 and CC4: Summary of responses from statutory bodies, other organisations and development industry**

Organisation	Site promoted	Key point(s) made
Barton Willmore (for Urban & Civic)	NS1 Bowmans Cross	Broad support for the aims of each policy in this chapter
British Horse Society	n/a	Would like bridleways added to Policy CC1
CPRE	n/a	Climate change policies in the plan are inadequate. Potential net benefits would be undermined by the scale of growth envisaged and by the reliance upon greenfield/Green Belt land. The aspiration for lower water consumption is welcomed, but the concept of water neutrality is questioned.
Environment Agency	n/a	Absence of blue infrastructure within Policy CC1 vii highlighted.
Hertfordshire County Council	n/a	Broad support
Hightown Housing Association	n/a	CC4: this will be superceded by the new Building Regulations effective from June 2022. Recommend change to iii: substitute passive with natural.
Planning Issues (for behalf of Churchill Retirement Living and McCarthy and Stone)	n/a	CC2: It would be pragmatic for the Council to align its standards with those of the Government and rely on amended Building Regulations. The implications for viability cannot be taken into account as the Council has not published its viability evidence on the draft Local Plan as whole.
Sport England	n/a	Welcome Policy CC1 particularly emphasis on walkable neighbourhoods and active travel
Savills (for Crown Estate)	R1, Land north of Watford Road	Broad support, welcomes the optional standards for lower water consumption. Further work is required to demonstrate how some of the aspirations set out within CC3 and CC4 can be delivered.
Tetlow King (for TLC)	B4 Heathbourne Green, Bushey Heath	No changes required
Wolf Bond (for Griggs Homes)	HEL218 Organ Hall Farm, Borehamwood HEL390 Land adj to Harris Lane, Shenley,	CC2 and CC4 The proposal to prepare a Climate Change and Energy Strategy for each site is welcomed, but not at outline stage. Further clarification is required on whole carbon assessments; this detail is essential and cannot be deferred/left to potential SPD(s) mentioned in the text.

**Policies D1 – D5, Design for Life**

6.113 The majority of responses in relation to the design section of the plan were made by statutory bodies and developers. Many of the overall principles in this part of the plan were supported but greater flexibility in the drafting and/or application of policies was sought by a number of those responding.

- 6.114 Site promoters commented on the ability of sites to exceed the residential densities set out in Policy D1 (Making effective use of land) with some suggesting that a restrictive approach risks increasing the amount of Green Belt land required; greater flexibility was required in the application of Policy D1. It was also suggested that the requirement for all residential development to meet the Home Quality Mark in DL2 (High quality, safe and accessible development) should be encouraged rather than mandated. Clear justification was required for the policy given the potential to impact on scheme viability.
- 6.115 Policy D3 (Design standards) seeks the use of minimum space standards which have advocated, subject to the necessary evidence, by government since 2015. Both the CPRE and HBF, despite their opposing views on most parts of the plan, were in agreement that insufficient evidence had been provided by the Council to justify Policy D3.
- 6.116 The requirement for Health Impact Assessments (HIAs) in Policy DL4 (Health Impact Assessments) was supported by some organisations but said to be unnecessary by others for certain forms of housing/sizes of development. It was suggested that the requirement for HIAs should only be applied to proposals of 100 units and above or where there are clear issues likely to affect health and wellbeing.
- 6.117 Although HCC, as Waste Planning Authority, welcomed the robustness of sustainable waste management practices and policy in the plan, the CPRE considered that Policy DL5 (waste arisings) needed to be strengthened to ensure Thames Water's upgrades were in place before developments are occupied.
- 6.118 There were very few residents' responses to the policies in this part of the plan. One submission, in relation to the design standards requirements, considered that the Council should seek powers to prevent short term holiday lettings in the borough, given the proximity to London. Another response stated that new developments required additional parking than is currently provided, both for residents and visitors.

**Policies DL1, DL2, DL3, DL4 and DL5: Summary of responses from statutory bodies, other organisations and development industry**

Organisation	Site promoted	Key point(s) made
AEW Europe	The Point, Borehamwood	The Point can achieve greater density (260dph) than those indicated in the plan for either town centres (230dph) or as specifically indicated for The Point itself (170dph).
Churchill Retirement Living and McCarthy and Stone (joint submission)	n/a	Significant reservations over mandatory requirement in Policy D2 for housing to be accredited by a third-party organization such as the BRE Homes Quality Mark due to costs and delays.
CPRE	n/a	Policy DL5 needs strengthening to require that no development starts until clear from Thames Water that the required upgrades to the waste water network will be completed before occupation.  Do not consider the Council has provided the evidence to justify the requirement for all new homes to meet spaces standards.
Crown Estate	R1, Land north of Watford Road	Regarding Policy D1, to limit need for development on Green Belt land, minimum densities as proposed for areas identified for development are appropriate. Apparent inconsistency between 'Other' Density Zone and the reference to

Organisation	Site promoted	Key point(s) made
		residential development on sites outside of the Density Zones should be clarified. Support Policies DL2 and DL4
Hertfordshire County Council (Growth and Infrastructure)	n/a	Potential impact of parking standards on density should be noted. Support Policy DL4 but should reference HCC HIA position statement (2019). Checklist in the Sport England and Public Health England Active Design guidance should also be used. Pleased to see the strong mention of sustainable waste management practices and policy within the draft local plan, including the section regarding the waste hierarchy and circular economy.
Hertfordshire County Council (property)	Various including HEL385c, Popes Farm, HEL274 Edwarebury House Farm, HEL318 Former Sunnybank Primary School	Density zones and minimum density targets in Policy DL1 are quite prescriptive and do not allow for consideration of local context and site-specific characteristics. Specialist housing may be delivered at higher densities due to their nature and layout. NPPF wording should be incorporated within Policy DL1, rather the minimum standard being used as a target. Regarding Policy DL2 it is not always possible to include tree lined streets.
Hightown Housing Association	n/a	Design Quality Mark is worthy of support but making it compulsory as per Policy DL2 is costly and burdensome. Health Impacts Assessments for large developments are appropriate but unclear what is needed for the scope of the smaller 'health statements' and whether these are needed for 10 unit plus schemes.
Home Builders Federation	n/a	Do not consider evidence provided justifies requirement for new homes to meet spaces standards. Some developers will provide entry level homes which may not meet the optional nationally described space standards but which enable lower income households to afford a property; no evidence that they go unsold. Alternative approach suggested.
Purcell School		Some development cannot meet BREEAM excellent level for a host of reasons.
Sport England	n/a	In relation to DL2, request policy goes further than the requirements of criterion v and expects all developments to incorporate active design principles. Support Policy DL4 but request that reasoned justification advocates use of the checklist in Sport England/Public Health England Active Design guidance to assess physical activity impacts.
Truveya (formally TLC Group)	B4 Heathbourne Green, Bushey Heath	General approach in D1 supported but more flexible approach to the density matrix may be required to optimise sites before releasing additional land from Green Belt. Support Policy DL4.
Three Rivers District Council		Support the uplift in density and zoning approach in Policy DL1.
Urban & Civic	NS1 Bowmans Cross	Support Policies DL2 and DL4

### Policies HE1, HE2, HE3 and HE4 – Local Heritage

- 6.119 A limited number of comments were received including from Historic England (previously known as English Heritage). Historic England considered many aspects of the plan to be sound but identified issues, particularly in relation to individual site allocations, for which insufficient detail was considered to have been provided. In the absence of such changes,

the plan would not be sound. Specifically, in relation to the Local Heritage policies, a number of detailed drafting comments were suggested relating to terminology and the setting of heritage assets.

- 6.120 A small number of other detailed comments were made by developers with one response specifically suggesting changes to Policies HE1, HE2 and HE3 without which they would not be sound.
- 6.121 Policy HE3 (Conservation Areas and their settings) was considered by Hertfordshire County Council to lack local distinctiveness who also stated that plan should encourage new development to reference local architectural styles and building materials. The need for a specific policy on Listed Parks and Gardens, covered in Policy HE1, was requested by the Hertfordshire Gardens Trust.
- 6.122 The very small number of responses from residents did not comment specifically on the policies themselves but emphasised the importance of local character; one response was particularly critical of the Council's approach to the resourcing and consideration of heritage assets and suggested that the policies were not adhered to when considering planning applications.

**Policies HE1, HE2, HE3 and HE4: Summary of responses from statutory bodies, other organisations and development industry**

Organisation	Site promoted	Key point(s) made
Barhale Plc	Tarmac Land south of M25 HEL159a and north of Bell Lane/Salisbury Hall HEL159b	Reference to cumulative harm in Policy HE1 inconsistent with the NPPF. Rather reference should be made to substantial or less than substantial harm consistent with paragraphs 200-202 of the Framework.
Crown Estate	R1 Land north of Watford Road	Rather than stating that material harm to the setting of a listed building will not be permitted, Policy HE2 should state that material harm to the setting of a listed building will not be permitted unless outweighed by public benefits.
Hertfordshire County Council (Growth and Infrastructure)	n/a	This section of the plan lacks local distinctiveness, and it is unclear as to what both the historic environment and heritage assets include. Policy HE1 incorrectly assumes heritage assets just include designated historic buildings and locally listed buildings.
Hertfordshire County Council (property)	Various including HEL385c, Popes Farm, HEL274 Edgwarebury House Farm, HEL318 Former Sunnybank Primary School	Reference needed in Policy HE1 regarding need to weigh up public benefits of the scheme to secure its optimum viable use. Support general approach in Policy HE3. Detailed comment on proposed boundary change to South Mimms conservation area.
De Havilland Aircraft Museum	De Havilland Aircraft Museum	Given the historic significance of the de Havilland Aircraft Museum, plan should specifically refer to the importance of the museum in the preamble to Policy HE1 on page 160.
Hertfordshire Gardens Trust	n/a	Policy also need for Listed Parks and Gardens and their settings and for undesignated heritage assets
Historic England		Detailed terminology and drafting changes suggested to the policies. Substantive comments related to Policy H10 and insufficient evidence base to justify allocation of sites.



Organisation	Site promoted	Key point(s) made
King and Co.	HEL375, Manor Road, Potters Bar, HEL255/HEL254 Blanche Lane, South Mimms HEL341, Allum Lane	No reference in Policy HE1 to the public benefits which could be generated by development and the positive weight this should be afforded. Policies HE2 and should be amended in relation to the amount of weight to harm to a listed building and conservation area respectively, to reflect the planning balance exercise.
Masonic Charitable Foundation	B2 Compass Park, Bushey	Specific comments about heritage and Site B2.
Urban & Civic	NS1 Bowmans Cross	Support Policy HE1

## Policies ENV1 – ENV13 Protecting and Enhancing Our Natural Environment

- 6.123 Members of the public often raised environmental concerns through their strategic site responses, including issues such as loss of habitat, increased flood risk and reducing the opportunities for climate change mitigation. However, the majority of responses to this part of the plan were from statutory bodies, other organisations and the development industry.
- 6.124 Concerns were raised by some organisations that the policies do not go far enough in contributing to and enhancing the environment as stated in the NPPF. Significant additions were suggested by Hertfordshire County Council to support the air quality part of Policy ENV1 (Environmental Impact of Development). In relation to policies ENV3 and ENV4, which address biodiversity, some support was offered. However, several organisations including Natural England, Herts and Middlesex Wildlife Trust, Hertfordshire County Council and CPRE were critical of the lack of ecological and biodiversity technical work accompanying the plan consultation, stating that mitigation is not compensation for damage or loss of habitat, and nationally designated sites should not be developed at all. It was also often stated that this part of the draft plan will now need to be updated to take account of the evolving situation in relation to the Environment Bill, which has become an Act, together with the associated Biodiversity Net Gain proposals.
- 6.125 The development industry was largely supportive of the policies. However, the lack of recent surveys/studies was also highlighted, albeit stating that some sites were possibly no longer worthy of their designation.
- 6.126 Flood risk was raised by many residents in their responses to specific sites, particularly B1, B2, PB2, PB3 and HEL521, in relation to on and off-site fluvial (river) flooding and surface water flooding. Again, there were few way comments from residents on the policies relating to flood risk and water. However, there was general support from organisations for policy ENV8 (Green and Blue Infrastructure) that aims to restore and improve greenways and waterway links. This support came from the Environment Agency, Sport England, British Horse Society, Ramblers Association Urban and Civic and Barnet. The Environment Agency were also supportive of the measures in Policy ENV12 (Watercourses and Infrastructure) attaching a list of culvert condition surveys throughout the borough.
- 6.127 In terms of flood risk and drainage, aside from the apparent risks to sites, there was some concern that development of certain types can be permitted in flood risk areas Policy ENV10 (Flood risk and drainage). CPRE considered that natural flood risk mitigation measures were not emphasised enough. Due to flood risk from rivers being a cross boundary issue, the London Borough of Enfield wanted to know whether there are any flood storage or mitigation measures being provided as a result of the level of development and sought assurances that development would not increase flood risk to their (downstream) borough.

### Policies ENV1 – ENV13: Summary of responses from statutory bodies, other organisations and development industry

Organisation	Site promoted	Key point(s) made
British Horse Society	n/a	ENV3-Biodiversity Strategy: Additional section to promote greenways as part of the Biodiversity corridor network. BHS envisages Greenways/bridleways that could have higher hedges to promote biodiversity and provide extra habitat. (also applies to ENV8, Green and Blue Infrastructure)
CPRE	n/a	ENV1- Environmental impact of development: Eight locations are identified in the IDP where upgrades to sewer

Organisation	Site promoted	Key point(s) made
		<p>network are required due to existing limited capacity (water pollution and odour).</p> <p>ENV3- Concerned by the suggestion that habitats or species protected in legislation can still be damaged by development, with the damage mitigated or compensated for. Should be assumption that remaining biodiversity is protected. Out of borough compensation should not be permitted as would result in overall local loss. BNG should be 10% minimum. Possibility that and BNG monitoring and management plan not being required is alarming (p171). Council should require longer than 30 years for habitats to develop fully.</p> <p>ENV4 Policy is unacceptable in assuming nationally designated wildlife and geological sites can be damaged as a result of development and the damage mitigated or compensated for. Development proposals must avoid such sites and ensure that they are not damaged by activities on nearby development sites.</p> <p>ENV5- policy states proposals assessed for impact on landscape, but there is no indication of outcome of individual assessments in Chapters 7 and 8, or indication of impact of proposals on public rights of way crossing land.</p> <p>ENV6- Best and most versatile land on Grade 1, 2 and 3a land. Natural England advice is for surveys to be carried out to inform classification and planning decisions. Given most of Hertsmere is rural, the need to protect agricultural land should be given higher prominence.</p> <p>ENV 7- Large trees are difficult to manage and are often unpopular with residents so care should be taken when approving development to ensure building and construction works are well away from trees, as tree roots extend a considerable distance beyond extent of crown and damage may lead to eventual removal.</p> <p>ENV8 Colne and Mimms Hall Brook are Chalk streams are priority habitats under S41 of Natural environment and communities act. Planning permission should be refused if significant harm to biodiversity from development cannot be avoided in line with NPPF.</p> <p>ENV10 need to be rewritten given threat of climate change. For example, it states development in some flood zones will be permitted and development in flood risk zones can be expected to increase risk of flooding downstream. Also that nature based solutions to flood control better than man made defences and contribute to biodiversity recovery.</p> <p>ENV11- Greywater recycling supported, but should include rainwater harvesting. Urge council to introduce similar mandatory requirements for new houses.</p>

Organisation	Site promoted	Key point(s) made
Crown Estate	R1, Land north of Watford Road	ENV6 - Supporting text should make clear that land classification formed part of identification and consideration of allocated sites. Not clear how individual applications can demonstrate policy requirements
Environment Agency	n/a	ENV1- Note that Groundwater Protection, Principles and Practice has been replaced with The Environment Agency's approach to Groundwater Protection'  ENV11- Any new proposals should ensure that sustainable drainage design will achieve appropriate protection of groundwater.  ENV12- We are pleased to see this policy, winter rainfall is expected to increase by approximately 6% by the 2050s and by 8% by the 2080s, compared to a 1981-2000 baseline.
Herts and Middlesex Wildlife Trust	n/a	ENV3- Wording such as 'could', 'where possible' or 'should' will be ignored and cannot be enforced. Only definitive wording is acceptable and is supported by BS 42020.  ENV7- Should contain obligations for the use of buffers adjoining hedgerows. The ecological value of a hedge is eroded the closer development is situated to it.  ENV8- Buffer are vital to protect watercourses and linear habitat. Alternative wording proposed.
Hertfordshire County Council (Growth and Infrastructure)	n/a	ENV1: Requested paragraph(s) added on Public Health/Air pollution  ENV3: Advocate use of NE Biodiversity Metric. The desire to achieve biodiversity net gain on site should not come at the expense of achieving the most genuine net gain solution.  ENV4: Policy does not offer enough protection to SSSIs. Criterion ii) of the nationally designated sites section of this policy should be deleted and re-worded, in line with paragraph 180b of the NPPF.  ENV7- should be amended to align with intentions of the BS 5837:2012 which recommends Cat C trees should also be considered for retention, instead of just A or B. Cat C could also be valuable for wildlife for example. Little reference to landscaping and good design.  ENV13: Mineral Consultation Area: The county council supports the provision of this policy, in terms of mineral safeguarding.
King and Co.	HEL375, Manor Road, Potters Bar, HEL255/HEL254 Blanche Lane, South Mimms HEL341, Allum Lane	ENV3- Implications for deliverability of new development- (viability/yield) of BNG. Urge LA to have considered ramifications as part of policy and more specifically to have a broader strategy where BNG land is brought together in a centralised manner. This allows for contributions for delivery and maintenance of BNG land akin to SANG used by the Surrey authorities).

Organisation	Site promoted	Key point(s) made
LB Barnet	n/a	Look forward to working with Hertsmere on Green Infrastructure projects and reinvigorating the Watling Chase Community Forest across boundaries.
LB Enfield	n/a	The role of the Local Plan in responding to climate change is recognised and Hertsmere's approach to climate change and the protection and enhancement of the natural environment is supported.
Ramblers Association	n/a	Strongly support policy ENV8 Green and Blue Infrastructure and to improve greenways, however, requirement iv) is weak. Should be rewritten to maximise opportunities.
Redrow Homes	B1 Harts Farm, Bushey	Supportive of Draft Policy ENV3, ENV5 and ENV7 (subject to suggested change to EN7) ENV8 and ENV10.
Sport England	n/a	Policy welcomed as it supports protection and enhancements of the network of green and blue infrastructure including space for sport and physical activity. This policy would be considered to accord with paras 92 and 99 of the NPPF.
Truveya (formally TLC Group)	B4 Heathbourne Green, Bushey Heath	<p>ENV 1 Policy in accordance with section 15 of NPPF, paras 183-188. Both noise and contamination surveys have been carried out to demonstrate B4 is safe from noise pollution and ground contamination.</p> <p>ENV10 Generally supported and positively prepared. Only issue with flood flow routes that cannot always be maintained and it is sometimes beneficial to divert flood flow routes so as not to be in conflict with other parts of the policy.</p>
Three Rivers DC	n/a	The role of the Local Plan in responding to climate change is recognised and Hertsmere's approach to climate change and the protection and enhancement of the natural environment is supported.
Urban & Civic	NS1 Bowmans Cross	<p>ENV1- Support principles of policy. Submitted Topic Papers on air quality, noise and vibration, ground conditions and flood risk which summarise baseline conditions, likely effects and demonstrate how adverse effects can be managed.</p> <p>ENV3- Initial calculations conclude site is capable of achieving BNG. Ecology strategy outlines protection and enhancements of retained habitats.</p> <p>ENV4- Support for aims of ENV4. Redwell Wood SSSI will have a greater than 50 m buffer, with nature reserve between it and residential areas. Strategic planning will be used to minimise disturbance around LWS designated for Great Crested Newts and Tree Sparrows</p> <p>ENV5- Supports principles. Landscape strategy confirms opportunities to create enhanced parkland and other features through habitat creation.</p> <p>ENV6- Acknowledged that areas of land classified Grade 2 (v good) by NE, but is the most sustainable location for development beyond plan period. Bowmans Cross is supporting long term sustainable development in Hertsmere so loss of a limited areas of good quality agricultural land is justified.</p>

Organisation	Site promoted	Key point(s) made
		<p>ENV7- Supports principle. Site wide design focusses on providing new trees. Plans to plant at least 2 trees for every house (over 12,000).</p> <p>ENV8- Supports principles. Park living principles of Bowmans Cross highlight importance of well-integrated site wide blue infrastructure, incorporated into wider green infrastructure routes.</p> <p>ENV 10/11/12 Supports aims. Residential areas in FZ1. Topic Paper confirms implementation of SUDS strategy and reducing water consumption. Tyttenhanger Stream benefits from 9m buffer. Enhancement of watercourse and drainage areas will lead to BNG and encourage aquatic life such as Water Voles and Otters through enhanced water network</p>

### Policies LF1 - LF7 – Local Facilities

- 6.128 The responses to this part of the draft Local Plan were largely positive with support being expressed by a particularly wide range of statutory and non-statutory organisations and developers. Any concerns related mainly to detailed points, with several suggestions being made for re-wording to enhance policy clarity or local facility protection. Stronger support for the provision of new education and sports facilities was requested, and also that consideration be given to how to establish that a key community facility was no longer needed.
- 6.129 It was felt that new open spaces required as part of a development should be designated and protected against future development, but that the requirement for new open spaces to be run by a Trust (or similar) was suggested too onerous. Due to population increases and changing models for healthcare provision, with services increasingly moving out of hospitals and nearer to their communities, the CCG and NHS Property Services referred to increasing pressure on and need for additional space for GP surgeries and that developer contribution funding would be required. The CCG indicated that a business case will need to be made and agreed before any new facilities can be agreed. The need to ensure adequate reference to the planning considerations of adjoining boroughs, where proposals or need for additional key community facilities arose close to the borough boundary, was also raised.
- 6.130 Requests for adjustments to several designated open space boundaries and the addition of specific facilities to the list of those protected were made, and that the significance of the Hertfordshire Way long distance path and the Venue leisure centre in Borehamwood be recognised. Some residents also pressed for a solution to the closure/draining of Aldenham reservoir and it was suggested that an employment land promotion on Watford Road in the Green Belt should be allocated for development in order to help fund remedial work and safeguard their future. This point was included in around half of the Elstree template responses which whilst objecting to any allocations in the Green Belt considered an exception should be made for this site; however, Elstree template responses received on or after 27<sup>th</sup> November 2021 omitted this specific request. Concern about the potential loss of horse-riding opportunities was also mentioned.
- 6.131 Other residents' comments related mainly to concerns about existing and anticipated pressure on schools and health facilities and the lack of secondary provision, particularly in Radlett, together with some objection to the proposed secondary school in Borehamwood

(site HEL800 - see below) and relocation of the Schopwick GP practice to Allum Lane (site BE1 - see also under Local Housing Need); in relation to the latter, there was also concern expressed that the provision of a new health facility would open up the opportunity for the adjacent land to be developed for housing. The need to ensure adequate provision of local facilities prior to allowing significant new development - referred to elsewhere in the response to the consultation - was also mentioned. A proposal to allocate land at Haberdashers' Aske's Boys School for replacement sports facilities for Old Haberdashers to enable land at Croxdale Road Borehamwood to be developed for housing was submitted.

- 6.132 In relation to the proposed site for a further secondary school in Borehamwood residents expressed concerns about loss of Green Belt, open space and wildlife and the absence of special circumstances having been demonstrated. The implications for well-being and mental health of losing open space were mentioned. A particular concern was the increase in traffic that would arise and the implications both for levels of pollution and traffic congestion in an already busy area. The lack of easy access to public transport and of cycle routes was also raised. Another area of concern was whether there was actually a proven need for a new secondary school - spare capacity at Barnet and Borehamwood schools was mentioned. Being on the edge of Borehamwood it was suggested that the school would serve Barnet.

**Policies LF1 - LF7: Summary of responses from statutory bodies, other organisations and development industry**

Organisation	Site promoted	Key point(s) made
Aldenham Country Park	n/a	Include clear statement of Council's vision and plans for Aldenham Park and reservoir.
Aldenham Parish Council	As landowner also promoting HEL386 Gravel allotments, Heathbourne Road, Bushey Heath HEL219/252 Pegmire Lane Patchetts Green	Query lack of Radlett secondary school and location of proposed GP site (R3); include Aldenham reservoir as facility to be protected and preserved.
British Horse Society	n/a	In relation to Policies LF3, LF6 and LF7, new open spaces should be designated and protected (so cannot subsequently be built on/removed).
Cala Homes	S1 Shenley Grange, South Mimms	Lack of primary education capacity shouldn't constrain growth in Shenley.
Campaign for Real Ale (CAMRA)	n/a	Policy LF1: all pubs not just rural pubs should be included. Unclear how you establish if a pub is no longer needed.
Comer Homes	S3 Rectory Farm	Lack of primary education capacity shouldn't constrain growth in Shenley.
CPRE	n/a	Acknowledge importance of Hertfordshire Way long distance footpath.
Crown Estate	R1 Land north of Watford Road	Support Policies LF4 and LF5

Organisation	Site promoted	Key point(s) made
de Havilland Aircraft Museum	De Havilland Aircraft Museum	Plan should acknowledge importance of museum.
Elstree and Borehamwood Town Council	n/a	<p>Need evidence to justify proposed Borehamwood secondary school and Schopwick relocation; concern over lack of GP facilities to serve south Borehamwood; object to fire station move from Elstree Way.</p> <p>In relation to proposed secondary school, object to loss of Green Belt, increase in pollution and traffic on Barnet Lane; need for school not proven; inaccessible location; children would come from a wide catchment (impact on traffic), many too far to walk.</p>
Elstree and Borehamwood Green Belt Society	n/a	Local need for school to be proven; Green Belt, pollution, significant journey distances, traffic.
Haberdashers Aske School	n/a	Policy LF2 should enhance priority to education provision in line with NPPF 95; need to align LF2(ii) and Policy GB3 (some existing schools are already in less accessible areas).
Hertfordshire County Council (Growth and Infrastructure)	n/a	<p>Service uses several community facilities throughout the borough, in order to deliver services; these must be safeguarded to ensure all young people in Herts mere have local accessible facilities. Need to further discuss level of Fire and Rescue capacity to meet demand arising from new development (Borehamwood and Potters Bar station at end of useful lifespan).</p> <p>Support allocation for secondary school. Concern about allocation being in Green Belt as GB3 says development will only be permitted if no greater impact on openness and Green Belt purposes.</p>
Hertfordshire County Council (property)	Various including HEL385c, Popes Farm, HEL274 Edgwarebury House Farm, HEL318 Former Sunnybank Primary School	<p>Clarification of primary provision in South Mimms required; the proposed SEND school in Potters Bar, the new secondary school at Carpenter's Park, and the Fire and Rescue facilities, including proposed in South Mimms, need to be included and referenced (table 24).</p> <p>Policy LF1 should distinguish between community facilities to which public have access and buildings occupied by organisations that provide service to local community; policy needs to be supported by a revised list of what is defined as a 'key community facility'. Criterion (ii) needs to acknowledge that any replacement should provide facilities that are comparable in terms of a quantitative or qualitative standard to the original - efficient use of space is paramount. LF3(iv) national open space standards (eg FIT) should be used in relation to requirements for provision; LF4 public bodies should be able to retain ownership and management of new open space provision; Policy LF6 revise Oakmere School LGS boundary to exclude buildings.</p>
Herts Valleys CCG	n/a	Specific drafting changes requested to Policy LF1 in relation to loss or change of use of facilities. Do not object to proposals for additional facilities, but cannot commit to any relocations etc as all additional facilities will be subject to relevant business case approval by the NHS commissioner. Business case for Schopwick relocation has been approved.



Organisation	Site promoted	Key point(s) made
Impact Planning Services (on behalf of local residents)	n/a	In relation to Policy LF2, object to Schopwick relocation to Green Belt site away from Elstree village. Should be on a housing site. Being removed from Green Belt otherwise contrary to NPPF and unsound.
King and Co.	HEL375, Manor Road, Potters Bar, HEL255/HEL254 Blanche Lane, South Mimms HEL341, Allum Lane	Cemetery extension (HEL341) and Schopwick relocation site (BE1) should be shown on the proposals map; Policies LF3 and LF4 - standards should only be used to mitigate the impact of new development, not redress existing deficiencies.
LB Barnet	n/a	In relation to Policy LF2 acknowledge need for land in LB Barnet for Borehamwood secondary school; need continued collaboration HBC/LBB/HCC.
LB Enfield	n/a	
Lichfields on behalf of City and Docklands Ltd in association with Old Haberdashers Association	Land west of Watling Street, Radlett	Land west of Watling Street, Aldenham should be allocated as a Key Green Belt site for replacement sports facilities for Old Haberdashers site at Croxdale Road, Borehamwood
London Colney Parish Council	n/a	Object to use of London Colney medical centre.
NHS Property Services	n/a	Require developer contributions in order to meet demands of new homes.
Purcell School	n/a	In relation to Policy LF3, concern open space designation will hamper meeting development needs.
Ramblers Association	n/a	
Redrow Homes	B1 Harts Farm, Bushey	Support Policy LF4.
Reveley Lodge, Bushey	n/a	Support Policy LF3(iv).
Richborough Estates	HEL214 Land South of Theobald Street, Radlett	Policy LF4 should be modified to recognise that some of the open space typology may not reasonably apply to a particular scheme by reason of the scale of development, and that there can be more appropriate and cost-effective means of providing the required open space topology elsewhere rather than just being delivered on-site.
Sport England	n/a	Policy LF1(ii) should require replacement facilities to be at least an equivalent quality and quantity; Policy LF2 table 24 should include sports facilities; Object to Policy LF3(iv) as would allow for loss of sporting facilities; Policies LF1 and LF3 some duplication/ inconsistencies - changes suggested; LF3 - clarify how provision for sports facilities in new development will be assessed; support Policies LF5, add use of planning conditions as well as S106 for securing community use agreements; make clear importance of Venue Leisure Centre Borehamwood;
Theatres Trust	n/a	Support Policy LD1
Three Rivers DC	n/a	Allocate playing field land in Hertsmere for proposed new secondary school at Carpenders Park; welcome Table 24 and approach to protecting existing and new facilities.
Truveya (formally TLC Group)	B4 Heathbourne	Support Policy LF2; Policy LF4 requirement for new open space to be run by Trust overly prescriptive.

Organisation	Site promoted	Key point(s) made
	Green, Bushey Heath	
Welwyn Hatfield Borough Council	n/a	Concern over relying on Chancellor's School to meet Potters Bar education needs; need continued cooperation over health, education, community and sporting facilities; have regard to nearby allocations in Welwyn Hatfield Local Plan .
Urban & Civic	NS1 Bowmans Cross	In relation to Policy LF2, Bowmans Cross will provide facilities as required.

### Policies ST1 to ST6 – Sustainable Travel

- 6.133 Responses received highlighted the importance of modal shift and sustainable travel to addressing climate change and improving the health and well-being of residents, through reduced pollution and increased physical activity. It was suggested that further consideration needed to be given to parking levels, school runs, commuter trips, additional rights of way and the access strategies for the existing railway stations. Concerns were also raised that a number of sites proposed including edge-of-settlement locations and the new settlement are likely to be car-dependent.
- 6.134 A key concern was the ability of transport network to cater for the traffic growth generated by new developments, and whether this could be suitably mitigated given the significant level of funding required and the existing capacity issues on the road network. The lack of clear interventions to encourage sustainable travel and an over-arching transport for Hertsmere were noted by a number of consultees with the expectation being that the sustainable transport study will need to be completed, and consulted on, prior to any local plan documentation being finalised.
- 6.135 Residents raised concerns over the attractiveness and practicality of using sustainable modes given the poor east to west connectivity, the lack and reduction of bus services, the preference for the private car, and the lack of designated cycle ways. Significant investment would therefore be required in order to facilitate modal shift and sustainable travel, including greenways, traffic calming measures, road improvements, and EV charging. Concerns were also raised over the poor record for maintenance and improvements to the current road network, and how sustainable travel can be made available for all road users including cyclist, horse riders, and those with physical disabilities. The need for further discussions with HCC highways, TfL and other stakeholders was emphasised.
- 6.136 Respondents were broadly supportive of policies ST5 and ST6 which promote sustainable transport and safeguarding aviation, although concerns were raised over the viability of car club and potential expansion of Elstree Aerodrome.

### Policies ST1 - ST6: Summary of responses from statutory bodies, other organisations and development industry

Organisation	Site promoted	Key point(s) made
Aldenham Estate	Various locations within the estate	Supports the principle of the safeguarding policy, which is a continuation of the approach taken under the current Local Plan. Any proposal for development of the Community Park on B2 will have an impact on the aerodrome as this element of the proposed B2 development site lies below the departure route for Runway 26.
Aldenham PC	n/a	The draft plan does not appear adequately to address the issue of the impact on the road network. The new Local Plan should actively discourage car use on new developments and

Organisation	Site promoted	Key point(s) made
		the transport improvements should be made prior to development taking place. The current road structure cannot support the level of housing suggested (e.g. Watling Street and Aldenham Road).
Barhale Plc	n/a	Sustainable transport solutions will vary between urban and rural areas.
British Horse Society	n/a	ST1 could be made more encompassing, so to include all non-motorised users. Walkers, riders and cyclists should not be an afterthought in the development design process. Uptake in active forms of travel will require new attractive routes not adjacent to roads.
CPRE	n/a	Edge-of-settlement locations and the proposed new settlement are likely to be car-dependent, located in many cases too far for active travel options to be realistic. There is no over-arching public transport plan for the Borough area which might succeed in reducing car use. How is the scale of modal shift required going to be achieved? Less accessible areas aren't suitable for development.
Crown Estate	R1 Land north of Watford Road	A focus on maximising opportunities for sustainable travel and modal shift is clearly necessary and is supported. However, development should only be prevented on highways grounds due to highway safety, or severe cumulative impacts on the road network. Defined Accessibility Zones and improved connectivity between and beyond key centres is supported, provided that they are deliverable and affordable.
Hertfordshire County Council (Growth and Infrastructure)	n/a	Encouraging sustainable transport modes should be the priority over delivering new roads and parking facilities. New development should be located in areas where access to sustainable transport routes and facilities exist or can be made available. Both the plan-wide and site-specific transport strategies need to be further developed. Access to any future HERT network will be important, in particular from strategic sites such as Bowmans Cross.
Hertfordshire County Council (property)	Various including HEL385c, Popes Farm, HEL274 Edgwarebury House Farm, HEL318 Former Sunnybank Primary School	Both sites introduce or seek to upgrade new pedestrian routes within and through the site, building on identified desire lines. HCC support Hertsmere's approach to encouraging sustainable transport modes as a priority over delivering new roads and parking facilities. Contributions should however reflect the scale of the development proposed.
Hightown Housing Association	n/a	Support for EV charging, however clarity is required over the amount of active and passive provision given recent government announcements.
Home Builders Federation	n/a	Recent Government announcements indicate that all new homes will be required to have access to an electric charging point and the Council will need to reflect on these changes once they are introduced. There is no justification for the development industry to deliver or subsidise car clubs and this requirement should be removed.
LB Barnet	n/a	Improvements to public transport links in and around Borehamwood and Potters Bar are requested. Developers should liaise with TfL and HCC to ensure there is sufficient provision of public transport into Barnet.

Organisation	Site promoted	Key point(s) made
LB Enfield	n/a	We consider that the draft strategy in relation to transport and parking to be a sustainable and pragmatic approach. The recognition of the role of the rapid development of technology is welcomed.
Masonic Charitable Foundation	B2 Compass Park, Bushey	The proposals for site B4 scheme incorporate a variety of elements that promote sustainable travel.
Ministry of Defence	n/a	The MOD would wish to be consulted on any potential development within the Aerodrome Height Safeguarding Zones surrounding RAF Northolt. Development which might result in the creation of environments for large and flocking bird species hazardous to aviation will be subject to scrutiny.
National Highways	n/a	We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.
Ramblers Association	n/a	Reference should be made to the Local Cycling and Walking Infrastructure Plans and the current edition of the HCC Rights of Way Improvement Plan. All new paths, bridleways, and greenways should be dedicated as public rights of way
Redrow Homes	B1 Harts Farm, Bushey	The ability to agree discounts on the parking requirements based on multiple factors such as accessibility and availability of public transport is supported.
Sport England	n/a	The policies are supported as they prioritises active travel and improved accessibility to local services and open space in strategic allocations which will encourage physical activity. The aerodrome is an important facility for recreational flying.
Three Rivers DC	n/a	We support proposals that seek to achieve a sustainable modal shift. This is essential to addressing climate change and improving health and wellbeing.
Urban & Civic	NS1 Bowmans Cross	The Bowmans Cross Mobility Vision Statement will directly contribute to the strategic ambitions of policy ST1. The Concept Masterplan has been developed specifically to incorporate the principles of walkable neighbourhoods to maximise accessibility by non-car modes and maximise potential for trip internalisation.

### Policies VTC1 to VTC10 – Vibrant Town Centres

- 6.137 The final section of the draft Local Plan attracted the fewest number of specific responses from either individual residents or organisations. However, those responding largely supported proposals in the draft plan to maintain and enhance Hertsmere’s high streets and town centres.
- 6.138 Concerns were raised over the deliverability of the proposals given the number factors which impact on a high streets' success and the importance of a co-ordinated approach was emphasised. Respondents also raised concerns about the potential for the overall growth strategy in the draft Local Plan to have a negative impact on existing retail facilities given the likelihood for increased congestion and limit parking with town centres and the potential for increased completion from new local centres. Questions were also raised about the restrictions imposed with primary frontages and whether this will detract future investment.

6.139 It was suggested that the Local Planning Authority does not have the powers or does not choose to use those powers in order to improve high streets. The need for "big thinking" to regenerate town centres, particularly in Potters Bar, as highlighted including the appointment of a Town Centre manager.

**Policies VTC1 - VTC7: Summary of responses from statutory bodies, other organisations and development industry**

<b>Organisation</b>	<b>Site promoted</b>	<b>Key point(s) made</b>
Campaign for Real Ale (CAMRA)	n/a	Policy VTC8 severely restricts public houses to no more than 5% of core frontages in Primary Shopping Areas. This threshold should be removed.
Crown Estate	R1 Land north of Watford Road	The requirement that new centres (on strategic sites) are of an appropriate scale to serve the development and do not adversely impact on existing retail and local centres is supported.
Dacorum Borough Council	n/a	Greater reference to retail needs and the vitality of the High Street
Save Clarendon Park	n/a	Clarendon Park is a disaster for local residents and a failure of local government to plan positively for its community.
Urban & Civic	NS1 Bowmans Cross	U&C support the aims of all Policies. The proposed amount of retail space will be at an appropriate scale to support the reduction of vehicular trips but not detrimentally impact the existing town and city centres in its proximity.

## 7 Summary of other issues raised

7.1 Most responses received focussed on the overall growth strategy, individual sites and/or policies in the draft Local Plan . However, a number of other points were raised in some of the submissions received covering the following areas:

- Public engagement process
- Sustainability Appraisal/Strategic Environmental Assessment
- Habitats Regulation Assessment
- Evidence base
- Duty to Co-operate

### **Public engagement process**

7.2 The volume of responses to the regulation 18 draft Local Plan was unprecedented and exceeded any previous planning or non-planning public engagement undertaken by the Council. Officers are satisfied that the requirements set out in the Council's own Statement of Community Involvement were met and exceeded

7.3 A primarily digital engagement process was deployed to maximise awareness, facilitate responses to the draft Local Plan and make the most effective use of Council resources. This approach was taken against a background of the Covid-19 pandemic so efforts were made to 'Covid-proof' the commitments in the Statement of Community Involvement (SCI) to ensure maximum safety for the public and staff. Two days after the end of the public engagement period, the government introduced its 'Plan B' due to the rapid spread of the latest variant of the virus across the United Kingdom.

7.4 HBC officers met with 30 different groups through a series of stakeholder meetings. Physical copies of the Local Plan, forms and pre-paid envelopes were made available at locations across the borough including libraries and leisure and community centres. This variety of channels and methods for engagement was crucial in ensuring that everyone in the borough could have their voice heard.

7.5 Notwithstanding this, a number of responses from the general public commented on the way in which public engagement was undertaken. The main points raised were as follows:

- Difficulty registering with or using the Council's consultation portal
- Particular households not receiving a copy of the newsletter or receiving it late
- Criticism of the quality of the newsletter and its failure to say that residents could also comment via email or post
- Digital Survey questions are misleading or leading
- Absence of any face-to-face meetings or exhibitions
- Public engagement period was not long enough

### **Sustainability Appraisal/Strategic Environmental Assessment**

7.6 The preparation of a sound Local Plan requires all reasonable options and alternatives need to be properly tested and this must be evidenced in the Sustainable Appraisal/Strategic

Environmental Assessment (SA/SEA). This is very much an iterative process with the SA/SEA updated as the plan progresses.

- 7.7 Natural England, Historic England and the Environment Agency are statutory consultees on SA/SEA. Only Natural England addressed the SA/SEA in their response and their observations, although limited in scope, will need to be taken into consideration moving forward with the plan. A limited number of other individuals and organisations commented on the SA/SEA typically commenting on the way in which individual effects on particular sites had been assessed or, in the case of the Home Builders Federation, stating that a higher growth level should be assessed in the SA. Particular issues were raised over the approach taken to scoring the new settlement at Bowmans Cross. It was suggested that the assessments for environmental considerations (including biodiversity and emissions) and the economy should be reconsidered. Representations made on behalf of those whose sites which were not included in the plan also challenged some of the findings in the SA/SEA.

#### **Habitats Regulations Assessment (HRA)**

- 7.8 The Local Plan is also subject to Habitats Regulations Assessment (HRA) to consider the potential for impact on certain nature conservation sites designated under the Habitats Directive, now known as comprising the 'national site network'. This includes existing Special Areas for Conservation (SACs) and Special Protection Areas (SPA). There are no such sites within Hertsmere itself but the scope to impact on protected sites further afield must also be considered due to the potential for air pollution, water and other effects to extend beyond administrative boundaries.
- 7.9 Natural England, Historic England and the Environment Agency are statutory consultees on HRA. Natural England were the only statutory consultee to respond on the HRA, welcoming early discussion on the HRA and offering the Council its advice as policy options are progressed.

#### **Evidence base**

- 7.10 A large proportion of residents questioned whether sufficient work had been conducted to challenge the level of development proposed within the plan and the amount of Green Belt release suggested. The use of out-date housing projections were a frequent and particular cause for concern. Further clarity was also requested over the site selection process, along with an updated HELAA to reflect the proposed growth strategy and any additional sites submitted as a result of the previous consultations or call for sites. The level of employment need was also questioned as it was stated that the report commissioned fails to consider the significant changes brought about by Brexit and Covid.
- 7.11 Concerns were raised over the absence of certain technical reports. A number of developers, including those promoting specialist older persons housing, highlighted the lack of available viability work which precluded them from making full comments on a number of policy requirements.
- 7.12 The absence of a Stage 2 SFRA and sustainable transport strategy resulted in comments from certain organisations such as National Highways and the Environment Agency being

caveated due to a lack of complete and up to date information. Consultees were also critical of the secondary school site work commissioned by HCC and the methodology adopted. In particular further clarity was sought over the requirements for an additional secondary school in Bushey, given the apparent overprovision of secondary schools within the area and the lack of facilities elsewhere. The approach taken to the Green Belt and the evidence to support its release was also queried, due the Green Belt being solely portrayed as a negative planning constraint as opposed to a key asset that warranted protection for its environmental and social benefits.

### **Duty to co-operate**

- 7.13 The Duty to Cooperate (DtC) was created by the Localism Act 2011 and places a legal duty on Councils and other public bodies in England to engage constructively and actively with each other, across administrative boundaries, on an ongoing basis in the preparation of local plans. Hertsmere has looked to engage pro-actively with neighbouring local authorities and other statutory bodies through the preparation of the new Local Plan . A number of representations on the draft plan included comments which are considered relevant to the DtC as summarised below.

<b>Organisation</b>	<b>DtC-related comment(s)</b>
<b>Dacorum Borough Council</b>	DBC welcome the positive strategy put forward at this stage, having worked closely with HBC through the DtC and on the preparation of a number of important evidence studies that have informed the current draft. DBC are keen that such cooperation continues as we work progressively towards finalising our respective local plans. Support the media quarter and are keen to work strategically with neighbouring authorities to ensure these opportunities can be maximised within media production. Further clarity requested I regards to the employment sites/jobs growth and retail needs expected to be provided across Hertsmere. DBC support the plan’s commitment to meet in full the minimum housing requirement and recognise the reasons why a stepped trajectory has been adopted. DBC would welcome further future meetings to discuss cross boundary issues and continue our regular DtC engagement.
<b>Endurance Estates (Site BE1)</b>	There is limited information available as to how the Council are proposing to satisfy the DtC, and address the concerns raised by both Welwyn Hatfield and St Albans Council. In particular, this relates to Green Belt sensitivity, transport connectivity/capacity, availability/capacity of services and facilities, and the new settlement at Bowmans Cross.
<b>Environment Agency</b>	Most natural resources extend across multiple Local Authority areas. Cross-boundary, collaborative working, through duty to cooperate discussions, will ensure that strategic priorities across local boundaries are properly co-ordinated. This includes climate change, flood risk, waste management, habitat and biodiversity enhancement, watercourse protection and improvement, water and waste resources.
<b>General public comments</b>	The proposed economic, social and environmental impacts and flows related to Potters Bar and Bowmans Cross are fundamentally flawed because the studies on which the plan was based exclude relevant neighbouring authorities such as Welwyn Hatfield, Barnet and Enfield.  All cross-boundary influences need be recognised through duty to cooperate discussions on housing provision, not just those in SW Herts.



Organisation	DtC-related comment(s)
	<p>Some of these development proposals have a more direct impact on settlements outside of Hertsmere. However there has been limited to no formal engagement with SADC on developing the plan; this contravenes HBC's duty to cooperate with adjoining authorities. Furthermore, the assessment of impact on local highways is very shallow and does not consider wider area.</p>
<p><b>Hertfordshire County Council</b></p>	<p>HBC and HCC have been working together constructively, prior to the publication of the Regulation 18 draft Local Plan. This consultation is the first opportunity to comment on a complete growth scenario in detail. Inevitably, there is a significant amount of comment that has been made by the county council, with regard to the strategic and smaller housing sites, draft policies and supporting text.</p> <p>The county council will therefore welcome the continued engagement with the LPA prior to publication of the Regulation 19 Proposed Submission Local Plan and its eventual submission to the Secretary of State, in line with the county council's Local and Joint Strategic Plans Engagement Document. Recognising that the plan is at Regulation 18 stage, the county council and Hertsmere Borough Council have signed a Statement of Common Ground acknowledging that further work is required prior to the Regulation 19 stage.</p>
<p><b>London Borough of Barnet</b></p>	<p>LBB supports Hertsmere's spatial strategy to make provision for meeting its full identified need. LBB would welcome being consulted on applications close to the boundary with Barnet including BE6, HEL97, the media quarter, HEL800 (secondary school), and sites around Potters Bar. Furthermore, the Local Plan should acknowledge the need for land within LB Barnet to deliver the secondary school and that early engagement and collaborative working will be required to ensure that very special circumstances are suitably demonstrated the release of this land. LB Barnet looks to working with Hertsmere on improving sustainable transport and green Infrastructure links across the boundaries, and reinvigorating the Watling Chase Community Forest project.</p>
<p><b>London Borough of Enfield</b></p>	<p>Generally supportive of the vision and strategic objectives underpinning the draft Local Plan. The draft growth strategy is based on the premise of infrastructure-led development which is strongly supported but further clarity is requested in relation to the range of housing growth options considered. LBE would welcome further discussions on employment capacity and gypsy traveller provision and keen to further explore the scope to meet identified needs as part of ongoing engagement and Duty to Cooperate discussions.</p> <p>The impact on the transport network is a key consideration for the plan and will await the release of the Sustainable Transport Strategy and Infrastructure Delivery Plan. LBE also requests confirmation as to whether any additional land within Hertsmere is likely to be sought for flood storage, attenuation or mitigation purposes as a result of the proposed levels of developments.</p> <p>It should be noted that the Habitats Regulation Assessment (2021) has not ruled out the possibility of adverse effects on the integrity of Epping Forest SAC or Wormley Hoddesdonpark Woods SAC. LBE would welcome further discussion on the provision of SANG as part of a mitigation strategy. LBE looks forward to continuing, constructive dialogue on strategic, cross boundary issues as part of the duty to cooperate as our local plans develop.</p>
<p><b>Highways England</b></p>	<p>As a statutory consultee, HE has a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. However, we cannot be expected to cater for unconstrained traffic growth generated by new developments, and we encourage policies and proposals</p>

Organisation	DtC-related comment(s)
	which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.
<b>London Colney Parish Council</b>	Concerns in relation to the Bowmans Cross proposal, and the extra pressures that this will put on the transport network and healthcare service within London Colney. This is especially true within the first phase of development where it is suggested that housing would be served by Summerfield medical centre and it is unlikely education facilities will be established. Furthermore, there appears to be no evidence that 'up to date traffic modelling' has been undertaken and the implications of the proposals at the Strategic Rail Freight Interchange in Radlett have been fully considered, or the impact that closing Coursers Road would have on local residents.
<b>North Mymms District Green Belt Society</b>	No evidence in the draft plan that the Council has attempted to fulfil its duty to co-operate with neighbouring authorities. Failure to engage with Welwyn Hatfield BC and the exclusion of WHBC from various joint evidence studies. In particular, detailed discussions are required over the management of the Green Belt to protect against the cumulative impact of development near borough boundaries. In particular our concern relates to the narrowing of a fragile gap between Potters Bar and Brookmans Park as a result of PB2.
<b>Oxhey Lane Developments Ltd (Site HEL357)</b>	The land at Oxhey Lane is a perfect example of the benefit of collaborative working and duty cooperate discussions. Currently half the site is proposed for development within Three Rivers Local Plan, by extending this site to include the adjacent land within Hertsmere the site could deliver around 300 dwellings.
<b>Shenley Parish Council/Neighbourhood Plan steering group</b>	It is unclear how Hertsmere's duty to cooperate with other boroughs has informed the local plan strategy. Furthermore, the lack of information for non-strategic housing sites and employment land is inadequate at this stage of the plan making process.
<b>St Albans City and District Council</b>	St Albans DC supports the ongoing productive DtC discussions. SADC may be in a position to support South West Herts Authorities in meeting the potential collective shortfall in employment land but due to limited land outside of the Green Belt and the high level of housing identified", SADC currently considers that it has no capacity to meet any of HBC's housing needs.
<b>Three Rivers District Council</b>	Wish to be kept informed over any such changes as HBC progresses to the next stage and look forward to further collaborative work on strategic cross-boundary issues, including the secondary school site in Carpenters Park and employment needs. Note that there are no proposed housing allocation sites located immediately adjacent to the HBC-TRDC boundary which would benefit from being master-planned and delivered together.
<b>Watford Borough Council</b>	Watford BC supports the progress being made on the Hertsmere Local Plan and the collaborative working between the authorities.
<b>Welwyn Hatfield Borough Council</b>	WHBC continues to be willing to constructively engage as part of the duty to cooperate arrangements for both the Welwyn Hatfield and Hertsmere local plans respectively and is keen to strengthen the constructive work with its neighbouring local planning authorities and other public bodies to maximise the effectiveness of policies for strategic matters. WHBC supports continued cooperation amongst the LPAs for the planning and delivery of strategic infrastructure and future sites allocations, particularly where boundaries adjoin in Potters Bar. In particular further discussions are requested in relation to Bowmans Cross (sustainable transport and Green Belt boundaries) and former Potters Bar Golf Course (gap between Potters Bar and Brookmans Park).

Organisation	DtC-related comment(s)
	Furthermore, consideration needs to be given to potential increased traffic on the A414 and A1M as a result of the proposed growth in Welwyn Hatfield and the strategic infrastructure implications of development around Potters Bar including secondary education capacity (Chancellors School).

## **Appendix 1 – Digital Survey**

# Hertsmere Borough Council – Survey Questions

October 2021

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## Demographic questions

1. Name
2. Email address
3. Age group [18-24 years old, 25-34 years old, 35-44 years old, 45-54 years old, 55-64 years old, 65-74 years old, 75 year or older]
4. Post code
5. My interest in the Local plan is because (select all that apply): [I am resident in the borough, I work in the borough, I own a business in the borough, I visit the borough for leisure, I have children going to school in the borough, I use local facilities in the borough, I have family in the borough, Other (please specify)]

## Future Hertsmere

This Local Plan delivers the Government's set target of 760 new homes each year by providing homes to meet the needs of current residents and the next generation. Our plan proposes that 40% of new homes must be affordable compared to buying or renting on the open market.

6. Rate how important the local need for new homes is to you. [Highly important, slightly important, neutral, low importance, not important]
7. Hertsmere needs more genuinely affordable homes [strongly agree, agree, neutral, disagree, strongly disagree]

## Hertsmere Works

By planning for growth locally, we can ensure new homes are focussed in the areas we have identified and work towards the delivery of jobs, schools, healthcare facilities and transport links to support this growth.

8. Rate how important local infrastructure and services investment is to you. [Highly important, slightly important, neutral, low importance, not important]
9. What type of jobs would you like to see created and supported in Hertsmere? [select all that apply]

[Aviation and Avionics, Communications and IT, Film and Television Production, Financial Services, Manufacturing, Medical Research, Retail and Service Sector, Warehousing and Distribution, Other (please specify)]

## Green Hertsmere

Hertsmere is predominately Green Belt. By planning for growth now we can develop brownfield sites and a small amount of Green Belt land to meet Government targets and local need, while creating new and improved opportunities for recreation and open space in the countryside. Without planning for growth in this way, Hertsmere risks having unplanned development without the necessary infrastructure to support it.

10. Rate how important you think it is to plan for development which meets our environmental, social and economic needs. [Highly important, slightly important, neutral, low importance, not important]
11. I think that further opening up access to green space is important [strongly agree, agree, neutral, disagree, strongly disagree]

## Healthy Hertsmere

The Local Plan will make strides to tackle climate change and improve access to public services.

12. Rate how important it is that new development sites are designed so that they respond to climate change. [Highly important, slightly important, neutral, low importance, not important]
13. I would support new development in my area if new local facilities are delivered alongside it [strongly agree, agree, neutral, disagree, strongly disagree]

### **Creative Hertsmere**

The Local Plan will promote creative industries including film and TV, generating jobs and training opportunities along with investment in the borough.

14. Rate how important it is to develop the creative industries in Hertsmere. [Highly important, slightly important, neutral, low importance, not important]
15. Hertsmere should promote apprenticeships for local people in creative industries [strongly agree, agree, neutral, disagree, strongly disagree]

### **Connected Hertsmere**

The Local Plan looks to reflect the shifting priorities created by the pandemic, with more home working placing a greater importance on local shops, open space, and a reduced emphasis on commuting.

16. Rate how important it is to have local services within walking distance. [Highly important, slightly important, neutral, low importance, not important]
17. The pandemic has permanently changed my work habits. [strongly agree, agree, neutral, disagree, strongly disagree]

### **Distinctive Hertsmere**

The Local Plan proposes planning for growth in a way that enhances what is special about Hertsmere, keeping it distinctive, connected, and creative, while ensuring that we remain a green, healthy, and happy borough.

18. Rate how important maintaining the look and feel of your area is to you. [Highly important, slightly important, neutral, low importance, not important]
19. I would be more likely to support growth that is well-designed and beautiful [strongly agree, agree, neutral, disagree, strongly disagree]

### **Other feedback**

20. Tell us what you think about the Local Plan. [Free text – 250 words max]

*By submitting your feedback, we will process your data under the provisions of General Data Protection Regulation and the Data Protection Act 2018. We will only retain your data to contact you with information about the emerging Local Plan and analyse the feedback we receive on the emerging Local Plan. If you do not wish to be contacted again about the Local Plan, please tick this box.*

*'We' comprises Hertsmere Borough Council and Atkins and Grayling Engage who are supporting the Council with the public engagement around the emerging Local Plan.*

## **Appendix 2 – Template responses**

## **'Save Borehamwood' – Objection to Plan Template**

*Dear Hertsmere Planning Department,*

*I strongly object to the draft Local Plan for Hertsmere, which would do harm to the borough, for the following reasons:*

1. *Borehamwood and its surroundings are already too heavily built up. Adding 2770 houses will overburden the town and the area. We cannot accommodate another 800 homes on Cowley Hill (BE3), on valuable arable Green Belt land which is farmed for food crops. This land also separates the join up of Borehamwood and Shenley. We cannot accommodate 165 homes on Organ Hall Farm Greenbelt (HEL218) (which separates Borehamwood and Radlett) or 250 homes on Woodcock Hill Greenbelt (site BE6) (separating Borehamwood and Elstree).*

2. *The residents of the borough have been very clear on what they NEED which is:*

a. *Improved infrastructure – We need much better traffic infrastructure, adding another 8000 cars on our already congested roads is not to our benefit. We also need improved healthcare provision – doctors, dentists, and hospitals.*

b. *Protect the Greenbelt. The draft plan destroys 12% of the Greenbelt. This is enormous. We need the Greenbelt with all its benefits for our physical and mental health. The Greenbelt should be protected at all cost, especially now in the climate crisis that we are facing.*

c. *Build more affordable houses. People do need to live somewhere but in places they can afford. Brownfields and disused land must be used for this, NOT the Greenbelt. Because of Covid, there will be loss of offices and work places that can be used in future.*

*In his speech on 6th October 2021, The Prime Minister clearly stated that new homes would be built on brownfield sites and not green fields. This is now backed up by the Budget announcement prioritizing brownfield redevelopment. We want Hertsmere Borough Council to uphold this pledge and preserve the Greenbelt. This draft plan is based on out-of-date data and in doing so it is over-provisioning housing.*

3. *The 'Media Quarter' is NOT in the interest of the residents in Borehamwood, Shenley, Radlett, or Elstree. It would be three times the size of the Sky studios, using the Greenbelt land, which should NOT at all be used for industrial projects.*

- We would lose an enormous area of green spaces, along with the Hertfordshire's largest stables home to 200 horses*

- It would provide very few permanent new roles for local people*

- It will cause thousands of extra traffic congesting all the roads which are not being improved at all*

- Industry experts have told us it would cause the demise of Elstree Studios.*

- Recent analyst reports show we are hitting a peak of studios usage and will start to have a surplus of studios again soon. Elstree Studios is owned by the people of Hertsmere and you have no right to try and destroy it with this proposal.*

- The Elstree Screen Arts Academy has never been involved with the Local Plan and does not support a competing media college opening five minutes away from them.*

4. *Building on both Cowley Hill and the 'Media Quarter' would take away all accessible greenbelt for the people of Borehamwood. It would leave nowhere to walk and ride. Cowley Hill is one of the most deprived wards in Hertsmere and you're taking all its Greenbelt away.*

5. *Concern: Inadequate consultation regarding the conservation of bat habitats I am raising a concern in the public interest about the impact of the draft local plan on the conservation of bat habitats. All bats and bat roosts are legally protected in England pursuant to the Conservation*



*(Natural Habitats & c) Regulations 2010 (as amended) and the Wildlife & Countryside Act 1981 (as amended).*

*The local plan does not provide any meaningful information about how bat habitats will be protected in the event that the proposed large-scale development goes ahead in the borough. There are multiple sightings of bats and bat roosts throughout Hertsmere's greenbelt, yet the draft local plan makes no mention of bats nor requirement for survey.*

*Making planning decisions without due consideration of priority species is contrary to the Natural Environment & Rural Communities (NERC) Act 2006 which applies to all public organisations, including local authorities. Planning authorities have a legal obligation to consider whether bats are likely to be affected by a proposed development. Planning authorities have a duty to request that developers commission an appropriate survey and take account of the presence of bats as a material consideration. I trust you are aware that damaging or destroying a place used by bats for breeding or resting carries CRIMINAL LIABILITY and has led to substantial penalties and costs in recent court cases. Bat crime is committed even if bats are not occupying the roost at the time. It is concerning that Hertsmere Borough Council (HBC) has failed to adequately consult on the subject of bat conservation during this public consultation. Given that the consultation is due to end on 6 December 2021, I am worried that HBC has failed to obtain and disclose background papers relevant to the decisions on this proposed local plan. If HBC has not had enough time to obtain and disclose technical surveys to the public, this consultation process much be extended to enable adequate consultation to take place.*

*I object to building on the greenbelt in ANY location in Hertsmere and on ALL sites named in this Draft Plan (in no particular order) namely: – BE1, BE3, BE5, BE6, HEL152, HEL197, HEL218, HEL369, HEL388, HEL601, HEL212, HEL274, HEL175, B3, B2, B1, HEL235, HEL337b, HEL337c, B4, HEL386, HEL502, HEL505, HEL521, PB2, PB3, HEL162, HEL177, HEL216, HEL318, HEL375, R1, R3, HEL214, HEL220, HEL222, HEL231, HEL348/349, HEL390, HEL228a, HEL228b, HEL320, HEL385c, NS1, HEL345, HEL179, HEL 180, HEL199, HEL219/252, HEL509, The Media Quarter.*

*There is an enormous lack of consultation from the Council regarding this Local Plan: no exhibition and proper consultation with the residents. It is all online which cuts out MANY residents. The portal is extremely non-user friendly. No printed information and helplines, some areas not having received the 'leaflet' which everybody was supposed to receive. 245 pages online is NOT helping to see things clearly, especially senior citizens who struggle to engage with this type of media. It's as though the less people who know about the Local Plan, the better*

*The draft Local Plan as it stands now would bring significant harm to us the residents of Borehamwood and Hertsmere/*

*I wish to attend a public meeting concerning this matter.*

*Thank you for receiving my comments*

*Yours sincerely*

## **'Save Elstree' Template – Objection to Plan Template**

[note: Final paragraph, relating to EMP1, was only included in template responses received up to and including 27<sup>th</sup> November 2021]

*Dear Hertsmere Planning Department,*

*I strongly object to the Draft Local Plan for Hertsmere, which would do harm to the borough. I object to building on the Greenbelt in ANY location in Hertsmere and on ALL sites named in this Draft Plan (in no particular order) namely: – BE1, BE3, BE5, BE6, HEL152, HEL197, HEL218, HEL369, HEL388, HEL601, HEL212, HEL274, HEL175, B3, B2, B1, HEL235, HEL337b, HEL337c, B4, HEL386, HEL502, HEL505, HEL521, PB2, PB3, HEL162, HEL177, HEL216, HEL318, HEL375, R1, R3, HEL214, HEL220, HEL222, HEL231, HEL348/349, HEL390, HEL228a, HEL228b, HEL320, HEL385c, NS1, HEL345, HEL179, HEL180, HEL199, HEL219/252, HEL509, Media Quarter*

*Loss of Greenbelt – Summary for space*

- *The Greenbelt has a unique role to play in capturing and sequestering carbon from the atmosphere long-term; we cannot fight Climate Change without it.*
- *In our battle for clean air, the Metropolitan Greenbelt is our most valuable asset and must be preserved.*
- *Inherent to the concept of the Greenbelt is its PERMANENCE.*
- *Hertsmere Greenbelt is the natural habitat for many forms of wildlife and birds.*
- *The proposed sites are covered with numerous public rights of way and bridleways – used for hundreds of years by local residents enjoying the countryside, and these would be lost or their views severely impacted. The greenery is a major characteristic of the area – losing any part of it would change the character forever.*

*Calls to Preserve the Greenbelt*

- *In earlier local plan consultations, residents asked Hertsmere BC to protect and preserve the Greenbelt.*
- *Hertsmere has over 75% of its land areas in Greenbelt (Dept for Leveling up, Housing and Communities, quoted by CPRE 16/11/21), restricting areas available for development.*
- *The draft plan includes proposed development on 10% of Hertsmere's Greenbelt (1,025 hectares).*
- *The Government made public statements on protecting the Greenbelt; The Prime Minister (6/10/21) clearly stated that new homes would be built on brownfield and this was backed up by a Budget announcement.*
- *The Campaign for Rural England (CPRE) finds that Hertsmere's draft local plan represents 58% of all Greenbelt lost to developments across the whole of England in 2020.*
- *The CPRE'S latest report on the state of brownfield in England has found that this previously developed land could accommodate over 1.3m new homes ([www.cpre.org.uk](http://www.cpre.org.uk) 18/11/2021).*
- *There needs to be push back by Hertsmere on central Government on the allocation of UK house building by the "standard method" in areas such as Hertsmere where Greenbelt is significant.*
- *Building on Greenbelt is attractive to developers as it is often cheaper than building on brownfield. This does not constitute exceptional circumstances.*
- *Climate change needs us to consider how we produce food sustainably and locally. The plan does not consider how our Greenbelt could help to meet these needs now and in the future.*

*Data*

- *The Government have admitted that the data on which this draft plan is based is out of date. It is likely over-provisioning housing need.*

- *The 2021 census data needs to be considered, as does the impact of Brexit (and the consequent change in migration), the pandemic, the move to net zero, and other recent and forecast social and economic trends.*
- *The plan does not consider houses or care home spaces currently sitting empty in the borough or the repurposing of petrol forecourt sites (for example) which will become obsolete during the period.*

#### *Elstree*

- *The draft plan includes a near 20% increase in housing planned for Elstree & Borehamwood. At more than one car per UK household – probably closer to two in our semi-rural borough, with the additional traffic coming into Sky Studios and the proposed Media Quarter, this is a huge increase in traffic on our roads.*
- *Most local main roads already have severe traffic during school run and rush-hour periods.*
- *There are limited short diversion routes between Elstree and Borehamwood when there are incidents or road closures (eg repairs and maintenance to services which are frequent) due to the need to cross the railway line.*
- *Watling Street / Elstree Hill North / Elstree Hill South (A5183) and Barnet Lane (A411) are cut-through routes when there is congestion and/or closure on the M1, A1, A41 or M25.*
- *It is already particularly difficult for Elstree traffic to turn out of Deacons Hill Road onto Barnet Lane or from Allum Lane onto Watling Street / Elstree Hill North due to the traffic flows on the major roads. This situation has continued to worsen over the years with no improved infrastructure in many decades.*
- *Station Road roundabout in Borehamwood is already at capacity for much of the day and gridlocking the high street is not good for trade, air quality or emergency vehicle access.*
- *Physical constraints limit the scope for further adjustments to the junction design in the centre of Elstree Village. This area is also a designated Air Quality Management Area (AQMA).*
- *Roads in the part of Elstree around Allum Lane, Barnet Lane, Elstree Hill, Deacons Hill, etc are narrow and hilly; they do not support the use of bicycles and do not have capacity for cycle lanes. Cyclists using these roads at rush hour can make the traffic situation worse and even dangerous when cars try to overtake on hills.*

*ADDITIONAL and FURTHER comments to specific sites as detailed below, namely:-*

#### *HEL197 Land North of Barnet Lane Elstree – 75 homes*

- *Green Belt – no exceptional circumstances. Also, local Wildlife Site.*
- *Away from existing infrastructure. More than 15 minutes' walk. No primary schools in the area.*
- *Exit to Barnet Lane on a bend and a hill with limited sightlines is dangerous, particularly right turns out and into proposed site. It is already difficult to turn out from Deacons Hill into Barnet Lane. This would be harder.*
- *Vehicle exit to Hartfield Avenue would have a negative impact on traffic flow out of Deacons Hill Road onto Barnet Lane and Allum Lane.*
- *Proposed cycle route shows lack of understanding of the area, which has steep hills and narrow roads.*
- *No public transport serving this area with long steep-hill walk to reach the closest public transport.*

#### *BE6 Land North of Barnet Lane East – 250 homes*

- *This is the village green. It is a nature reserve, a Protected Local Wildlife Site. Trees have TPOs.*
- *Greenbelt – no exceptional circumstances.*

#### *BE1 Schopwick Practice Relocation – Allum Lane Elstree*

- *Other sites have been considered, but freedom of information requests have been left unanswered. Greenbelt is cheap, but this is inappropriate development in the Greenbelt and there are no exceptional circumstances.*
- *The site is not in Elstree Village near the population it serves; moving a pharmacy and surgery away from Elstree Village would be extremely harmful to the viability of the village and the residents who live there. It would also be inconvenient and add to local traffic.*
- *The proposed entrance to the practice is in the dip of a hill, which is already dangerous when there are tailbacks from the refuse sight. There are poor sightlines turning right from the site into Allum Lane due to the adjacent hill, especially during rush-hour tailbacks on the westbound lane. This would be a very dangerous place to locate this for access.*
- *The site is not easily accessible given the narrow footpaths on Allum Lane and the hills needed to be negotiated even to get to and from the bus stops. There are no obvious crossing points on the road. The island near Knowl Way and the bus stops is not a safe place to cross given it is on the brow of a hill. At the bottom of Allum Lane, there is no clear site line for pedestrians to see traffic turning into the road. This is particularly dangerous for infirm or vulnerable patients.*
- *The dip on the hill in Allum Lane is prone to flooding (at times has become impassable in recent years after heavy rainfall) and the existing meadows help to soak up some of this excess rainwater.*
- *Public footpaths used for leisure and mental well-being pass through the site. You can hear yourself think and have wonderful views on this route away from the traffic rather than the Allum Lane / Elstree Hill route.*
- *Permitting development in this section of the meadow will make it easier to approve further residential development in the same field which is lucrative to developers, further eroding Greenbelt.*
- *Parking is planned to take up additional Greenbelt, rather than be kept underground, to minimise any impact.*
- *Further traffic to the area would exacerbate the situation at rush hour and during afternoon school runs.*

#### *HEL212 Land North of Watford Road – 90 homes (Care units)*

- *Greenbelt – no exceptional circumstances, not suitable for extra care as far from town centre.*
- *Proposed McCarthy and Stone independent Living Complex is too expensive for most local residents.*

#### *HEL274 Land at Edgwarebury, Elstree Hill South – 100 homes*

- *Greenbelt – no exceptional circumstances, difficult transport links, far from town centre and facilities.*

#### *New Senior School – Land off Barnet Lane*

- *This is Greenbelt land. There are no exceptional circumstances to remove it from this protection.*
- *Very little of the Borehamwood community is in walking distance of this location, so a large proportion of students would be reliant on bus networks or most-likely cars bringing additional traffic into an already very busy rush hour location.*
- *This location does nothing to serve the Radlett, Shenley or Aldenham communities, who do not have access to a local state secondary school and could only reasonably access this location by private car.*

#### *BE3 – Land East of Cowley Hill*

- *800 homes proposed for Borehamwood are in Shenley Parish; this impacts on Borehamwood as all Council Taxes would be paid to Shenley Parish and NOT Elstree & Borehamwood Town Council.*

#### *Brownfield Sites – Density of Development and other issues*

- *The purely brownfield redevelopment sites (BE5, HEL388) in the plan are preferential to Greenbelt sites; however, the schools, and possibly GP infrastructure to support them, will likely need to be on Greenbelt.*
- *To achieve the numbers on the sites, these are going to need to be high rise developments, possibly 2 tower blocks in the middle of Shenley Road. There is no thought through plan given for improved transportation or other infrastructure. The gym, bingo and cinema all add to creating a vibrant Town and bring footfall to local shops. Car parking is necessary for shops, All Saints Church events and 96 Shenley Rd events and production.*

*EMP1 – Land North of Centennial Park, Elstree*

- *Although this land is Greenbelt, including it in the Plan would have a significant impact on local residents as it would help to secure Aldenham Reservoir for future generations.*

*Thank you for receiving my comments.*

*Yours sincerely*

## **'Save Potters Bar' Template – Objection to Plan Template**

*Dear Hertsmere Planning Department*

*Statement of objection to the content of Hertsmere Borough Council's draft local plan*

*I am writing to object to the Hertsmere local plan as the proposed large-scale massacre of greenbelt is unconscionable given the known environmental crisis endemic in the UK. Destruction of trees will severely impact climate change (planting seedling trees is no answer). London is planting more trees to help counter climate change whilst Hertsmere is cutting them down!*

*In particular I am lodging a focused objection to the proposed development of the greenbelt referred to as PB3 on your local plan and adjoining site 318 Sunnybank School, which is intrinsically linked to PB3.*

*I object to the proposal relating to Potters Bar site PB3 (900 homes) because*

- 1. The proposed construction will cause floods: Concreting over the greenbelt will cause run-off water floods to houses on Oakroyd Avenue and Elmroyd Avenue and closes*
- 2. Building homes and a school close to a motorway would be both unhealthy (fumes and noise) and unpleasant for anyone occupying the proposed dwellings, particularly children breathing in M25 fumes constantly. There is also compelling scientific evidence that living close to electricity pylons can cause cancer.*
- 3. The existing 1930s infrastructure was never intended to handle new growth needs on the proposed scale: There would be enormous pressure on existing town infrastructure and facilities such as sewage and waste disposal, schools and doctor's surgeries should the proposal go ahead.*
- 4. The proposed development would cause horrendous traffic congestion along Baker Street and its junctions with Darkes Lane and Mutton Lane.*
- 5. The proposal does not include any specific information about how infrastructure, including parking would be expanded and improved.*
- 6. Potters Bar is known to be an area of subsidence and an impact assessment would be required to assess the risk of damage to the foundations of properties caused by the proposed construction. Given that one of the most critical railway systems runs under PB3, serious thought would need to be given to eliminating the risk of damage to properties bordering PB3*
- 7. Ancient trees, hedges and biodiversity would be impacted and would need to be protected if the proposal went ahead. This includes rare species of trees, birds and endangered species including badgers, bats, pheasants and newts.*
- 8. The character of the area would change radically, Oakroyd Avenue, Elmroyd Avenue, the adjoining closes of those avenues and part of Baker Street being designated as a conservation area*
- 9. The boundaries between Hertfordshire and London would be blurred, each entrenching onto the other, with no buffer between the motorway and adjoining homes. The Green Belt is designed to ensure a geographical separation between urban areas and once it has gone it will never be reinstated.*
- 10. The development of PB3 and other greenbelt sites in Hertsmere would lead to the disbursement of rodent populations including rats which are a known health risk. Any building project would need to take into account the health, building and psychological risks involved. Given that Pope Paul Primary School is sited on PB3, children would be vulnerable to diseases caused by*

*rats and significant risk measures and mitigations would be required, well beyond standard for a building project on the proposed scale.*

*11. The projected housing need is predicated on 2014 housing data which does not reflect the current state of affairs post Brexit and post COVID remote working arrangements*

*12. An estimated 8% of CO2 comes from the cement industry alone: concrete construction is notorious for the amount of carbon release to the atmosphere. The government has pledged to reduce carbon by 78% by 2035. The proposal does not include any specific information on how this carbon release is to be off-set. Concrete building sites also contribute to silicosis and respiratory diseases.*

*Notwithstanding my objection to the draft proposal in relation to PB3 and Sunnybank, I object to building on the greenbelt in ANY location in Hertsmere and on ALL sites named in this Draft Plan (in no particular order) namely: – BE1, BE3, BE5, BE6, HEL152, HEL197, HEL218, HEL369, HEL388, HEL601, HEL212, HEL274, HEL175, B3, B2, B1, HEL235, HEL337b, HEL337c, B4, HEL386, HEL502, HEL505, HEL521, PB2, PB3, HEL162, HEL177, HEL216, HEL318, HEL375, R1, R3, HEL214, HEL220, HEL222, HEL231, HEL348/349, HEL390, HEL228a, HEL228b, HEL320, HEL385c, NS1, HEL345, HEL179, HEL 180, HEL199, HEL219/252, HEL509, Media Quarter*

*I suggest developing alternate brown field sites (unused industrial and commercial sites to be converted to residential buildings)*

*Concern: Inadequate consultation regarding the conservation of bat habitats I am raising a concern in the public interest about the impact of the draft local plan on the conservation of bat habitats. All bats and bat roosts are legally protected in England pursuant to the Conservation (Natural Habitats & c) Regulations 2010 (as amended) and the Wildlife & Countryside Act 1981 (as amended).*

*The local plan does not provide any meaningful information about how bat habitats will be protected in the event that the proposed large-scale development goes ahead in the borough. There are multiple sightings of bats and bat roosts throughout Hertsmere's greenbelt, yet the draft local plan makes no mention of bats nor requirement for survey.*

*Making planning decisions without due consideration of priority species is contrary to the Natural Environment & Rural Communities (NERC) Act 2006 which applies to all public organisations, including local authorities. Planning authorities have a legal obligation to consider whether bats are likely to be affected by a proposed development. Planning authorities have a duty to request that developers commission an appropriate survey and take account of the presence of bats as a material consideration. I trust you are aware that damaging or destroying a place used by bats for breeding or resting carries CRIMINAL LIABILITY and has led to substantial penalties and costs in recent court cases. Bat crime is committed even if bats are not occupying the roost at the time.*

*It is concerning that Hertsmere Borough Council (HBC) has failed to adequately consult on the subject of bat conservation during this public consultation. For example, in relation to the site marked PB3 on the draft local plan, HBC disclosed in 2018 that an initial ecology study revealed the presence of bats and that technical studies would be required if the site were considered further. Yet HBC has now departed from that commitment and stated on 18 November 2021:*

*“we anticipate receiving and reviewing site surveys and technical reports, for ecology and other matters over the coming months”.*

*Given that the consultation is due to end on 6 December 2021, I am worried that HBC has failed to obtain and disclose background papers relevant to the decisions on this proposed local plan. If HBC*

*has not had enough time to obtain and disclose technical surveys to the public, this consultation process much be extended to enable adequate consultation to take place.*

*Yours sincerely*



## **'Save Little Bushey' – Objection to Plan Template**

*Dear Hertsmere Planning Department,*

*Harts Farm and fields, Little Bushey Lane, Bushey (site B1)*

*I am objecting to the proposed development of Harts Farm, as shown in the Draft Local Plan, for the following reasons:*

*Loss of Green Belt.*

*This is a plan for excessive economic development which takes no account of the loss of Green Belt. The Government says brownfield sites are to be used before Green Belt but you have failed to make representations or alter the Local Plan accordingly.*

*Fall in housing demand*

*Housing demand has fallen according to Government figures as has been highlighted by both the CPRE and Hertsmere opposition councillors.*

*Traffic*

*The development at Harts Farm will generate some 1200 extra cars on the already congested Little Bushey Lane, more with the other local developments. In a recent Little Bushey Community traffic study, the figures demonstrated an increase of 12% in three years. The biggest being 0900-0930 with an increase of 32 %.*

*Flood risk*

*The site and surrounding roads have been identified a flood plain by the Environment Agency ranging from medium to high risk. Little Bushey Lane already floods as does the new development at Rossway Drive. 350 more houses will increase that risk.*

*Loss of wildlife*

*The inclusion of a flood plain in this site creates a unique biodiverse environment. This area, which is constantly sodden can be considered to be a water meadow and coupled with the hedgerows, lends itself to be a micro-nature reserve of wildlife including protected muntjac deer, pipistrelle bats and Canada geese.*

*Lack of public transport*

*The nearest bus route with limited evening and Sunday services is 10 minute walk away. This lack of accessible public transport makes any development entirely car dependent.*

*Loss of ancient rights of way*

*Two ancient Right of Way public footpaths that cross the land giving people the opportunity to visit the wildlife area.*

*Marked as B40 and B33 they are designated as 'definitive' on all walking maps and maintained by Hertfordshire County Council.*

*I also object to building on the Green Belt in any location in Hertsmere and on all sites named in the Draft Local Plan, namely:*

*BE1, BE3, BE5, BE6, HEL152, HEL197, HEL218, HEL369, HEL388, HEL601, HEL212, HEL274, HEL175, B3, B2, B1, HEL235, HEL337b, HEL337c, B4, HEL386, HEL502, HEL505, HEL521, PB2, PB3, HEL162,*

*HEL177, HEL216, HEL318, HEL375, R1, R3, HEL214, HEL220, HEL222, HEL231, HEL348/349, HEL390, HEL228a, HEL228b, HEL320, HEL385c, NS1, HEL345, HEL179, HEL180, HEL199, HEL219/252, HEL509, Media Quarter*

*Thank you for receiving my comments.*

*Yours sincerely*

## **'Save North Bushey' – Objection to Plan Template**

*Dear Hertsmere Planning Department*

*Dear Sir/Madam*

*I strongly object to the Local Plan for Hertsmere, which will cause irreversible harm to the borough, and I object to the de-classification and development of greenbelt land in ANY location in Hertsmere and on ALL sites named in this Draft Plan (in no particular order) namely:*

*BE3, BE5, BE6, HEL152, HEL197, HEL218, HEL369, HEL388, HEL601, HEL212, HEL274, HEL175, B3, B2, B1, HEL235, HEL337b, HEL337c, B4, HEL386, HEL502, HEL505, HEL521, PB2, PB3, HEL162, HEL177, HEL216, HEL318, HEL375, R1, R3, HEL214, HEL220, HEL222, HEL231, HEL348/349, HEL390, HEL228a, HEL228b, HEL320, HEL385c, NS1, HEL345, HEL179, HEL180, HEL199, HEL219/252, HEL509*

*I request that I am given the opportunity to attend any public meetings arranged by Hertsmere Borough Council in respect of this plan and that I am informed of the dates and times of any such meetings and that they are publicised widely.*

*In his speech on 6th October 2021, The Prime Minister clearly stated that new homes would be built on brownfield sites and not green fields. This is now backed up by the Budget announcement prioritizing brownfield re-development, with recent research by CPRE identifying brownfield sites, in England alone, which could accommodate 1.3 million new homes, a 10% increase on 2020 figures. I want Hertsmere Borough Council to uphold this pledge and preserve the borough's greenbelt. The draft plan is flawed and based on out-of-date data and in continuing with this plan it is over-provisioning housing.*

### *HEL521 BUSHEY HALL FARM SITE*

*The proposed plan for this site would have devastating effects, bringing with it increased traffic and air pollution, further water stress, through increased demand, driving over abstraction of the chalk aquifer and threatening the nearby River Colne. The biodiversity of the area would be negatively impacted by the destruction of habitat, whilst increased traffic and development will amplify surface water run-off, creating a greater risk of flooding and pollution of the nearby River Colne, which is one of Hertfordshire's rare chalk streams.*

*There are many reasons why site HEL521 should not be included in the Local Plan and were previously identified in previous iterations of the plan but are now largely being ignored, but with no material changes to the site which would support its inclusion for development. Many of the following reasons apply to ALL the sites listed above.*

### *Air Pollution*

*Clean air must be a priority in the battle to reverse climate change. With Hertsmere declaring a climate change emergency, the destruction of green spaces, fundamental to the sequestering of carbon from the atmosphere, must be prevented at all costs. Clean air, free from increased traffic pollution must also be the right of all residents of Hertsmere. Increased traffic in the area, from both private and commercial vehicles, entering and leaving the industrial area via Bushey Mill Lane will negatively impact air quality in North Bushey.*

### *Amenity space*

*HEL521, like many of the sites listed above, has a public right of way, used daily by local residents to access the local walking routes across Otterspool and beyond. These routes will be negatively impacted by large-scale increases in development, losing their purpose as valued open space in otherwise built-up areas. North Bushey itself has few green spaces or parks accessible without a car; our nearest large public parks, with family amenities, being King George's in Bushey and Cassiobury in Watford.*

### *Flooding*

*The impact of large-scale development on climate change cannot be overstated, especially where it replaces green spaces and the resultant increases in CO2 directly affect the warming of the planet. With warmer climate comes an increase in storm rainfall, which is responsible for the huge increases in UK wide flooding witnessed every year. Part of the HEL521 site is within the local flood plain and the roads around North Bushey, Little Bushey Lane, Watford, the River Colne and Hilfield Brook all suffer from the impacts of significant flooding as a result. Developing this land, which, when considering the overall local topography, sits at the bottom of a hill in the river valley, will negatively impact the flood plain, potentially increasing flooding in the immediate area or pushing it along stream to other areas of the Colne, such as the Radlett Road Park and Watford. Any flooding would have the additional negative impact of polluting the Colne with surface water run off from the new industrial area and proposed housing, which will have brought with it an increase in cars, lorries and other industrial vehicles. Hilfield Brook also carries the overflow from the Hilfield Reservoir, which in turn discharges into the Colne and with increases in rainfall it could reasonably be expected that the reservoir will be more often at capacity. Any building on land at its lowest point will be subject to risk of flooding, making HEL521 a wholly inappropriate site for development.*

### *Lack of local infrastructure*

*Small roads already busy with traffic and parked cars, often at a standstill during busy times cannot accommodate the large increases in traffic these developments will bring. HEL251 is situated in an area protected by width restrictions, to reduce and discourage large vehicular access from the Bushey Mill Lane and Park Avenue entrances, meaning large vehicles must enter from Hartspring Lane. With the entrance for the new industrial area located in Bushey Mill Lane, just after the width restriction, lorries will be tempted to use the 'Buses only' central area of this width restriction in order to avoid having to travel along Park Avenue and up Bushey Mill Lane from the southern end. Likewise, an increase in commercial traffic along Park Avenue is unacceptable as, since the conversion of the 'Smith's' building into flats, the parking along the road has made it impassable, in places, to more than one car at a time travelling in opposite directions. These roads cannot adequately deal with such an influx of traffic. Neither is the area served well by public transport links, there are few and irregular bus routes in and out of North Bushey, and the nearest train station is located a 30-minute walk away, meaning the majority of residents are reliant on private cars or taxis to access local facilities such as shops, supermarkets, medical services, and entertainment. The local two form entry primary school is already oversubscribed.*

### *Loss of Greenbelt*

*The Greenbelt has a unique role to play in capturing and sequestering carbon from the atmosphere long term. We cannot fight Climate Change without it. In our battle for clean air, the Metropolitan Greenbelt is our most valuable asset and must be preserved without question. Inherent to the concept of the Greenbelt is its permanence. It has a crucial role to play in separating settlements, which otherwise would result in an urban sprawl. In this case, the 22 acres of land at HEL521 is the final buffer between Bushey and Watford and its removal will take with it the unique local character of the area. Overall, the combined size and scale of the plan's proposals will remove a total of 1025 hectares of greenbelt from Hertsmere and I object to this entirely.*

### *Noise and light pollution*

*Site HEL521 is bordered by the A41, M1 and A4008; noise pollution from these roads would be significant for any housing planned on the site, as is light pollution from surrounding street lighting and mist significantly from the floodlights at TopGolf. The close proximity of industrial units will exacerbate this further, adding to the noise and light nuisance already affecting existing residents of the area. Local residents also suffer significantly throughout the year, but particularly at nesting times, from the dreadful noise and guano issues caused by huge flocks of gulls, who use the industrial units as nesting sites. Increased numbers of industrial units on the HEL251 site will exacerbate this*

*well publicised problem, which severely impacts the lives of local residents and for whom an increase in potential nesting sites would be untenable.*

#### *Over-development*

*According to the Government's own figures housing demand is falling and this has been highlighted by the CPRE. The data used is out of date and exaggerates future requirements. North Bushey does not need or want further housing or industrial development on areas of its last remaining greenbelt, thereby changing its nature forever. Families choose to live here for the community's character and its semi-rural feel, whilst maintaining close links to London.*

#### *Water Stress*

*It is well publicised that the chalk aquifers that supply the majority of the area's water are already hugely over-abstracted and under severe stress, causing nearby chalk streams in other boroughs, such as the rivers Ver and Misbourne, tributaries of the River Colne, to run dry. Within the next few years, Affinity Water, who own site HEL521, will have fitted water meters to all properties in North Bushey in an effort to reduce consumption. Large-scale developments, both residential and commercial will negate any gains made from domestic water-metering, as will the construction process. If high volumes of water continue to be abstracted from the aquifer, the rich biodiversity supported by the chalk streams they feed will be lost forever. Of the 210 chalk streams classified globally, 76% are in England and 10% of these are in Hertfordshire. Herts Wildlife Trust have recently stated that urgent action is needed to protect these rare habitats, as they continue to come under severe pressure from pollution and over-abstraction of water for domestic and commercial use.*

#### *Wildlife*

*The greenbelt in Hertsmere is the natural habitat of a vast range of flora and fauna. On site HEL521 alone there have been sightings of grey herons, red kites, kestrels, buzzards, sparrowhawks, foxes, owls, bats and many other small birds. Alongside these, a wide variety of wild-flowers and grasses, established hedgerows and mature oak trees support an immense number of insects, including many species of butterfly and grasshopper. Elsewhere in Hertsmere badgers, muntjac deer, rare tree sparrows, moles, voles, field mice, skylarks and snakes are amongst some of the species whose habitats would also be permanently destroyed. Many of these species are protected or on red endangered lists.*

*In addition to my comments regarding HEL521 and ALL other sites in the proposed draft plan, I would like to make specific additional comments on the following sites:*

#### *R1 LAND NORTH OF WATFORD ROAD, INCLUDING KEMPROW.*

*The Watford Road is already an extremely busy thoroughfare and this site, next to a primary school will expose children to higher levels of pollution. The site comprises farmland which should maintain its agricultural use. There are listed buildings in the area, a tree preservation area, 2 local wildlife sites and a public footpath.*

#### *HEL345 ALDENHAM GLEBE*

*The Roundbush Garden Centre has been based here for 60 years, with the family having worked the land for 100 years. I object to this site being proposed for housing of any kind. This is also within the conservation area of Roundbush. There are listed buildings in the area and the land is part of the greenbelt.*

#### *B1 HARTS FARM AND FIELDS*

*The development at Harts Farm will generate some 1200 additional cars on the already congested Little Bushey Lane. In a recent traffic study, figures demonstrated an increase of 12% in three years, with a 32% increase between 09:00 – 09:30. The site itself and surrounding roads have been identified as flood plain by the Environment Agency, ranging from medium to high risk. Little Bushey*

*Lane already floods as does the new development at Rossway Drive, a further 350 houses on the site will exacerbate this risk. Additionally, the nearest bus route, which has a limited evening and Sunday service, is a ten-minute walk away. This lack of accessible public transport makes any development entirely car dependant, which will intensify the pressure from traffic on the surrounding roads, especially when considered in conjunction with sites B2 and HEL521 (see below), which are in close proximity, with proposals for a further 750 homes, 80 homes and a large extension to the Otterspool Way Industrial area.*

*B2 LAND NORTH OF FARM WAY – COMPASS PARK This land makes an important contribution to the gap between Bushey, North Bushey and Watford. Maintaining an unspoilt rural character, any development would significantly reduce the gap between these areas, contributing to urban sprawl. The increase in traffic levels in recent years already impacts the area negatively. Little Bushey Lane, Aldenham Road and Bushey Mill Lane are especially busy at certain times, with traffic queuing from the Aldenham Road traffic lights, in all directions, with waiting times often exceeding 20 minutes. An increase in housing and commercial buildings both here and at sites B1 and HEL521 will add exponentially to the traffic and worsen the already poor air quality experienced in the area. New housing and commercial development on these sites will potentially bring thousands of vehicles to the area.*

*As with all the other sites, there is insufficient infrastructure and additional homes will put greater strain on this. The two nearest secondary schools are oversubscribed as they also serve neighbouring towns. There is no public transport on Little Bushey Lane and the nearest bus routes are on Aldenham Road or Farm Way. The nearest train station is a 30 minute walk away. Development on this, and sites B1 and HEL521, will result in additional cars on already heavily congested roads, leading to increased emissions.*

*Like sites HEL521 and B1, flooding in the area is already a problem. During heavy or continuous rain, the surface water pours off the fields onto Little Bushey Lane, causing pools of water to form. The existing sewers are unable cope with this volume of water, causing untreated and polluted water to be discharged into local waterways, which form part of the areas rare chalk stream habitats. Documentation shows that Farm Way and Bournehall Avenue are at risk of flooding and Homefield, Springcroft and Finch Lane have flooded in previous years. As these roads are below the level of the fields, and any development would severely increase the risk of flooding to existing homes.*

*Thank you for giving due consideration to my comments and I hope that any decisions made regarding the Local Plan will take all of these important factors into account and carefully assess the impact that development of this scale will have upon the unique character of Hertsmere.*

*Yours faithfully,*

## **'Save Bushey - Land North of Farm Way' (Site B2) - Objection to Plan Template**

*Dear Hertsmere Planning Department,*

*I strongly object to site B2, land north of Farm Way, Compass Park being included the draft local plan.*

### *Infrastructure –*

*The infrastructure in this particular area of Bushey is not adequate to accommodate any further homes. There are already long traffic jams on both Little Bushey Lane and Aldenham Road during rush hour, at school drop off and at school collections times. The traffic on Little Bushey Lane can stretch past Sandy Lane as far as Geddes Road. The roads cannot accommodate the thousands more cars that would be inevitable from the number of homes suggested. The nearest train station is over 1.6 miles away taking more than 30 minutes to walk and the local bus service is insufficient to serve the number of homes. You have to wait weeks to get an appointment at the local doctors surgeries and the local schools are already oversubscribed with many children not even living in Bushey.*

### *Green Belt –*

*This large parcel of greenbelt land in Bushey forms part of the character of the area and stops Bushey merging with North Bushey and Watford which would turn the area into an ugly urban sprawl. As ARUP confirmed in their final Green Belt assessment, this particular piece of land is an important contribution to the wider strategic Green Belt.*

### *Wildlife –*

*There is an abundance of wildlife consisting of many birds of prey including Barn Owls, Tawny Owls, Buzzards, Kestrels, Sparrow Hawks and Red Kites which nest in the trees. Other birds including Spotted Woodpeckers and Green Necked Woodpeckers have also been seen. Many foxes reside in the fields and on summer evenings at dusk you can see a large number of bats.*

### *Mental Health & Wellbeing –*

*These fields are enjoyed by a huge number of residents. They are a renowned place to exercise, walk dogs, enjoy wildlife and people can be seen sunbathing and having picnics on summer days. During the lock downs in 2020, people travelled from further afield in Hertsmere and now it's used more than previous years to enjoy the landscape and wildlife.*

### *Flooding –*

*The existing sewers around the land north of Farm Way will not be able to deal with the volume of water from additional houses. These fields soak up a huge amount of rainwater and if they were built on, the water from non-porous surfaces such as roads and roofs would cause flooding to homes on the surrounding roads. Documentation shows that Farm Way and Bournehall Avenue are at risk of flooding. Homes on Homefield Road and Springcrofts have flooded in previous years and some homes already have flood defences in place due to the previous flooding. Any risk of flooding would only get worse if this land was built on and would have a serious impact on surrounding homes.*

*I believe that all the proposed sites on Hertsmere's Green Belt land should not be built on. These sites were identified and included as Green Belt land for a reason and should remain that way for future generations to enjoy. We are currently in a climate emergency and retaining the Green Belt, hedgerows and trees is seen as a major contributor to delivering Net Zero emissions. Any proposed development to Green Belt land should be halted after Boris Johnson, the Prime Minister, stated at the Conservative Party Conference that new homes would not be built on Greenfield sites.*

*I also object to building on the Green Belt in any location in Hertsmere and on all sites named in the Draft Local Plan, namely:*

BE1, BE3, BE5, BE6, HEL152, HEL197, HEL218, HEL369, HEL388, HEL601, HEL212, HEL274, HEL175, B3, B2, B1, HEL235, HEL337b, HEL337c, B4, HEL386, HEL502, HEL505, HEL521, PB2, PB3, HEL162, HEL177, HEL216, HEL318, HEL375, R1, R3, HEL214, HEL220, HEL222, HEL231, HEL348/349, HEL390, HEL228a, HEL228b, HEL320, HEL385c, NS1, HEL345, HEL179, HEL180, HEL199, HEL219/252, HEL509, Media Quarter

*Yours sincerely*



## **'Save Radlett' - Objection to Plan Template**

Dear Sir/Madam

*I strongly object to the Local Plan for Hertsmere, which would do harm to the borough.*

*I object to building on the greenbelt in ANY location in Hertsmere and on ALL sites named in this Draft Plan (in no particular order) namely: - BE3, BE5, BE6, HEL152, HEL197, HEL218, HEL369, HEL388, HEL601, HEL212, HEL274, HEL175, B3, B2, B1, HEL235, HEL337b, HEL337c, B4, HEL386, HEL502, HEL505, HEL521, PB2, PB3, HEL162, HEL177, HEL216, HEL318, HEL375, R1, R3, HEL214, HEL220, HEL222, HEL231, HEL348/349, HEL390, HEL228a, HEL228b, HEL320, HEL385c, NS1, HEL345, HEL179, HEL 180, HEL199, HEL219/252, HEL509*

*In his speech on 6th October 2021, The Prime Minister clearly stated that new homes would be built on brownfield sites and not green fields. This is now backed up by the Budget announcement prioritizing brownfield redevelopment. We want Hertsmere Borough Council to uphold this pledge, and preserve the greenbelt. This draft plan is based on out-of-date data and in doing so it is over-provisioning housing.*

### *Radlett Strategy*

*This proposed plan would have devastating effects on Radlett, changing the fundamental nature of the village as we know it, and increasing air pollution and climate change through desecrating the natural environment. The near 30% increase in housing planned for Radlett is a shocking proposal. With 4 people per household this would mean a 45% increase in the population of Radlett with no supporting infrastructure. As a rural village with already congested small roads, this would be untenable.*

*The following comments apply to ALL sites in the proposed draft plan (as listed above) :-*

### *Loss of Greenbelt:*

*The Greenbelt has a unique role to play in capturing and sequestering carbon from the atmosphere longterm. We cannot fight Climate Change without it. In our battle for clean air, the Metropolitan Greenbelt is our most valuable asset and must be preserved without question. Inherent to the concept of the Greenbelt is its PERMANANCE. The Greenbelt has a crucial role to play in separating settlements, which otherwise would result in an urban sprawl of Radlett, Elstree, Bushey, Borehamwood, Shenley and Potters Bar, taking from those areas their unique local character and countryside atmosphere.*

*Size and scale: the sheer size and scale of the proposal to rob Hertsmere of 1025 hectares of greenbelt is what we object to fully.*

*Air Pollution: clean air must be our priority in our battle against climate change and with Hertsmere declaring a climate change emergency we must not destroy the very greenbelt that is fundamental in sequestering carbon. We must plan for clean air to be a priority for our children in the Borough.*

*Noise pollution: schools border sites R1 and R3 and local communities surrounding with be blighted by noise with years of building traffic.*

*Lack of local infrastructure: small roads already busy with traffic at a standstill can take no more.*

*Amenity space: these proposed sites are covered with numerous public rights of way and bridleways - used for hundreds of years by local residents enjoying the countryside, and these would be lost with residents losing their rights to cross these.*

*Overdevelopment: Radlett does not need or want overdevelopment of housing on greenbelt sites that would fundamentally change its nature.*

*Character of the Village of Radlett: People live in Radlett for its character and village feel. It is a countryside village with close links to London, however it has small streets, limited infrastructure and is identified by its rural and tranquil atmosphere.*

*Harm to local wildlife: the greenbelt in Hertsmere is the natural habitat for many forms of wildlife and birds, including grey Herons, thrushes, gulls, peregrines, badgers, muntjac deer and rare tree sparrows. Owls, red kites, Kestrels, Buzzards, Spotted Woodpeckers, Green Necked Woodpeckers, bats, moles, snakes are amongst some of the species whose habitats would be destroyed.*

*Out of date data and assumptions: The data used is now out of date and is an exaggeration of what would be required. By contrast, Climate Change is a special circumstance and this is exactly why the Greenbelt must be preserved for future generations.*

*In addition to my comments above regarding ALL sites in the proposed draft plan, I note below ADDITIONAL and FURTHER comments to specific sites as detailed below, namely:-*

*R1 Land North of Watford Road, including Kemprow, including traveller site provision. Please see my points above. I would like to add these specific comments regarding this site:-Watford Road is already an extremely busy thoroughfare and this site is next to a primary school which would expose children to higher levels of pollution. This site is a farm and the land should be used for farming fruit and vegetables. Provision for a Traveller Site is not in keeping with the area and should not be close to a village with existing traffic problems, it should be next to a motorway on a brownfield site. There are listed buildings in the area, a tree preservation area, 2 local wildlife sites and a public footpath.*

*R3 Land South East of Shenley Hill, behind Newberries school Please see my points above. I would like to add these specific comments regarding this site:- This site is a designated site of geological interest and a designated wildlife site.*

*Residents and school children enjoy clean air, hearing birds and seeing natural wildlife at this site. There would be a huge increase in traffic through small residential roads – a safety concern for children, as well as the associated pollution. Children already suffer from asthma and allergies and families have chosen to live here exactly because of the proximity to this natural open space. This site is greenbelt, is a designated RIG (puddingstone). It adjoins Theobald Street local wildlife site.*

*S1 Shenley Grange*

*This would be crippling for the small village of Shenley, already busy with traffic on small roads. This area would be a huge loss of beautiful greenbelt separating Shenley and Radlett. This site is right in front of a primary school, creating pollution and increased traffic, disturbing to children at school due to site noise and pollution.*

*Aldenham Glebe HEL345*

*Roundbush Garden Centre has been based here for 60 years, with their family having worked the land for 100 years. We object to this beautiful site being proposed for housing of any kind. This is also within the conservation area of Roundbush. There are listed buildings in the area and the land is greenbelt.*

*Kemprow between Whitehouse and Adelaide Lodge HEL180 Greenbelt land that was somehow approved planning for a 4 bed house that is clearly not falling in line with the planning policy of very special circumstances. This land certainly shouldn't be permitted planning for a further 15 houses.*

*NS1 Bowman's Cross New settlement*

*A devastating proposal which would DECIMATE the character of the borough, connecting the settlements of London Colney and Potters Bar creating urban sprawl. In size, this settlement would be the size of Radlett itself, on existing road infrastructure which is already extremely busy, and a huge loss of greenbelt land and associated wildlife.*

*Thank you for receiving my comments*

*Yours sincerely*

## **'Save Shenley' – Objection to Plan Template**

Dear Hertsmere Planning Department,

### *Objection to the Hertsmere Draft Local Plan*

*I strongly object to the Draft Local Plan for Hertsmere and am extremely disappointed by the approach taken by Hertsmere Borough Council (HBC). The Local Plan will destroy the rural character of Shenley and does not respect the wishes of local residents as expressed in the Shenley Neighbourhood Plan.*

*The destruction of this scale of Green Belt land is totally unacceptable, therefore I object to building on the Green Belt in ANY location in Hertsmere and on ALL sites named in this Draft Plan (in no particular order) namely: – BE1, BE3, BE5, BE6, HEL152, HEL197, HEL218, HEL369, HEL388, HEL601, HEL212, HEL274, HEL175, B3, B2, B1, HEL235, HEL337b, HEL337c, B4, HEL386, HEL502, HEL505, HEL521, PB2, PB3, HEL162, HEL177, HEL216, HEL318, HEL375, R1, R3, HEL214, HEL220, HEL222, HEL231, HEL348/349, HEL390, HEL228a, HEL228b, HEL320, HEL385c, NS1, HEL345, HEL179, HEL 180, HEL199, HEL219/252, HEL509, Media Quarter*

*My objections are as follows:*

#### *1. Poor engagement process by HBC with residents*

*The process undertaken by HBC to engage with residents has been poor and the process for people to provide feedback has been difficult. No public meetings have been organised by HBC and key local groups were not engaged until very late in the process. Many residents have experienced difficulties in using the consultation portal. HBC have encouraged residents to complete a short questionnaire of 'leading' questions which only allows 250 words of feedback. For a Local Plan document of over 250 pages and supporting studies which are over 1000 pages long, this is not appropriate.*

#### *2. Outdated housing requirements for Hertsmere*

*HBC's estimate of the housing need for Hertsmere is based on outdated information and does not reflect recent developments including COVID and Brexit or the Government's 'levelling up' agenda. Section 7 of the Local Plan indicates that the proposed minimum of 12,160 homes to be built in the 16 year plan period is based on the South West Herts Local Housing Needs Assessment (LHNA). As highlighted by the Campaign for the Protection of Rural England (CPRE), the LHNA uses out-of-date figures from 2016 Office of National Statistics projections. It firmly believes that the latest projections from 2018 (and figures from 2020 soon available) should be used. These show a projected decrease in new households in the Borough for the plan period and therefore a reduced number of houses which should be planned for. The Government has repeatedly that its formula for assessing housing need is a starting point, but each local Council is responsible for taking into account local circumstances and constraints when preparing their plan. The National Planning Policy Framework (NPPF) allows councils to take into account the presence of designated protected land, including the Green Belt, in determining (reducing) the appropriate housing targets.*

*In Shenley, the Shenley Housing Needs Assessment report completed by Aecom in May 2018 for the Shenley Neighbourhood Plan states that the estimated unconstrained housing need for Shenley for the next 15 years was 220 homes. Given a high percentage of Shenley Parish is in the Green Belt, the amount of housing on a 'constrained' basis would be significantly lower. The Local Plan's proposals to build 350 homes in the village, with over 2000 in the wider Parish, are totally inconsistent with the housing need for Shenley.*

#### *3. Destruction of the Green Belt*

*The CPRE indicates that it is clear that HBC has a strong traditional economic growth agenda, with policy proposals presented in term of opportunities for further development and without major*

constraint. It estimates that 1025 hectares of land within the Green Belt are proposed for development. This is around 12% of the Green Belt land in the borough, which is a remarkably high percentage. Key weaknesses of the local plan with respect to the protection of Green Belt include:

- No evidence of any assessment of the impact of the loss of the Green Belt, especially with relation to health and wellbeing (SG7).
- Failure to identify that the high percentage of Green Belt land in borough is a positive attribute, thereby ignoring the contribution that open countryside makes to the quality of life for local people.
- Ignores recent government statements that are in favour of protection of the Green Belt, higher levels of investment in housing, employment and infrastructure in the North, making better use of brownfield sites and minimising development on the greenbelt areas in the South East. The Local Plan proposals are inconsistent with this critical 'levelling up' agenda.
- There is a lack of protection of Green Belt as a Strategic Objective for the Local Plan. A single line in Strategic Objective 13 (Section 3) refers to the Green Belt and policies referring to the Green Belt comprise six pages in a 245 page document. The minimal treatment of this major land designation is a significant failing of the Draft Local Plan.

#### 4. Disconnect with infrastructure plans

The HBC Local Plan is inconsistent with the overall infrastructure plans, in particular for transport, set out by Hertfordshire County Council (HCC). HCC are responsible for the provision of roads, transport and education. The areas for growth identified by HCC include the A1 and A414 corridors in the Harlow area. The HCC Local Transport Plan 2018-2031 indicates that the majority of the improvements in transport infrastructure will be outside the Hertsmere area. This demonstrates the disconnect between the significant expansion plans for housing in the Local Plan and the related infrastructure which is needed to support this increase. This is of particular note with respect to the Bowmans Cross development, where no further explicit investment by HCC in transport is proposed.

#### 5. Inconsistency of the Local Plan with the Shenley Neighbourhood Plan ("SNP")

The SNP was adopted in May 2021, with 94% of votes in favour. HBC has an obligation to consider the SNP when developing the Local Plan for Hertsmere. Once adopted, Neighbourhood Plan Policies carry full legal planning policy weight when planning decisions by HBC are being made in the area covered by the SNP. However, by stating that "the principles may inform the treatment of development ... in so far as they relevant to their setting and location and enable efficient development of land", HBC appear to indicate that they do not consider the SNP policies to be relevant to development sites in Shenley (including policies relating to housing design and density) and thus is disregarding the views of over 94% of Shenley residents.

Specific aspects of the SNP which have not been recognised by HBC in preparing the Local Plan are:

- Any land within Shenley that takes development should remain designated as Green Belt.
- The Spinney Woodland and connected hedge area is a "Local Green Space" area and should be protected.
- Specification of the housing mix required to meet the needs of Shenley Parish.
- Housing design principles and housing density which are in keeping with the rural nature of the village.

#### 6. Removal of Shenley from the Green Belt boundary

Section 5, page 43 of the Local Plan states that development in Shenley will "Define a new Green Belt boundary identifying the area within which growth ... will be delivered". Based on the accompanying map and resources, this appears to involve the removal of the entire village from the Green Belt. When Shenley residents were surveyed for the development of the SNP, 95% indicated that they wanted to retain the 'green nature' of the village and preserve the Green Belt surrounding the village. This proposal in the Local Plan disregards the views of these local residents. There are specific requirements to be met before concluding that exceptional circumstances exist to justify changes to the Green Belt boundaries, including making as much use as possible of suitable

brownfield sites, increasing density in locations well served by public transport, and discussing alternative sites with other local authorities. There is no detail in the Local Plan about how these considerations have been met, especially considering the village has very limited public transport with no provisions in the plan to improve this.

#### 7. Unsustainable Development

In the Local Plan HBC states that, for sustainable development, homes should only be built where there is the ability to walk to a railway station or catch a bus that runs every 3-5 mins, where there is good access to schools and GPs and where development does not add to traffic issues. Shenley does not currently fulfil this requirement and there is no clear commitment for the infrastructure in Shenley to be enhanced. The proposals do not meet the Council's own sustainability criteria.

The sustainable transportation report commissioned by HBC was not completed or available for residents to review during the consultation period. This is a significant failing of the development and consultation process as the Local Plan claims to promote 'sustainable development' but, without an assessment of the transportation needs of the borough and Shenley and a binding commitment to invest in more public transport, the proposed developments in Shenley cannot be sustainable.

#### 8. Impact on Road Network

There is already considerable congestion along London Road at peak commuter and school drop-off and pick-up times. The area on London Road near the primary school and junction with Harris Lane is particularly affected. The proposed high density housing developments at Shenley Grange/Longview and Harris Lane will add to the congestion and road safety issues in this area.

The large scale development at Bowmans Cross is also likely to have a significant impact on the traffic in Shenley. People travelling from Bowmans Cross to London are likely to commute from Borehamwood station and travel via London Road in Shenley.

#### 9. Impact of specific sites on Shenley

##### S1 (HEL348/349): Shenley Grange

The proposed density of housing on the site is significantly higher than the density of the existing housing in the village and conservation area and it is akin to 'urban density'. This contravenes the statement on page 107 to "protect the historic environment of the Shenley Conservation Area". The development is in very close proximity to the Spinney Local Wildlife site and pathway. The rich flora and fauna in this area includes protected species, such as the Great Crested Newt, a mature connecting hedgerow system and clusters of ancient woodland that run through sites HEL348/349. The government's policy guidance on 'Ancient woodland, ancient trees and veteran trees: protecting them from development' clearly defines these areas as "irreplaceable habitat", yet there is insufficient information in the Local Plan on what safeguards will be put in place to protect this area.

##### HEL390 : Harris Lane, Shenley

As with site S1, the proposed density of housing on the site is inappropriate to its setting and akin to 'urban density', contravening the plan's pledge to "protect the historic environment of the Shenley Conservation Area". This density is also not appropriate to retain a 'rural edge' to the village, as laid out in the Shenley Neighbourhood Plan.

The entrance to the housing estate would be opposite Harris Lane playing fields, which would have a significant negative impact on road safety near to the park and availability of parking near the fields. Harris Lane and the surrounding Rectory Lane are already heavily congested, and these country roads are not suitable for the additional traffic arising from a large-scale housing development. The hedgerows and established trees on Harris Lane near the playing fields make a significant contribution to the rural character of this road and it will not be possible to create a suitable access point to the development without destroying them. The open views of the countryside beyond the site be blocked by this development, having a significant adverse effect on the area's rural character.

*BE3 : Land to east of Cowley Hill*

*As this area forms an essential gap between Borehamwood and Shenley, developing this site would go against the Local Plan Core Strategy objective of preventing urban sprawl and the coalescence of towns. In Stage 1 of HBC's Green Belt review the conclusion was 'Development would not be suitable as the site formed part of a parcel identified as making a strong contribution to the wide Green Belt, particularly with regard to preventing encroachment into the countryside'.*

*Building a large scale housing development in this area would also go against sustainable building principles in the NPPF – building within 5 minute walk of a train station. The site is approximately 2 miles from the nearest station and there is no bus service every 3-5 minutes to a train station or local services. The nature of the development will also put significant pressure on the local amenities including the primary school, GP surgery and traffic in Shenley.*

*It will have a significant impact on the flora and fauna in the area. The area is also prone to flooding, potentially making it unsuitable for a large scale housing development.*

*R3 : Land South of Shenley Road, Radlett and HEL220 : Porters Park Golf Club Radlett Lane/ Shenley Hill is a winding road with many sharp bends. The proposed housing developments off this road will increase the risk of further accidents. In addition, the proposed entrances to both sites are near to the area of the road which are subject to regular flooding.*

*NS1 : Land at Coursers Road, Bowmans Cross The area around the London Colney lakes is a vital community asset for walkers, cyclists and fishermen. The proposed new 'town' adjacent to this area will have a significant adverse impact, destroying the peacefulness and rural nature.*

*HCC are not proposing any significant investment in road infrastructure in this area. This new 'town' will put a significant amount of pressure on the roads around London Colney and Shenley. Given the nature of the roads in these areas, it will not be possible to expand their capacity to respond to the extra traffic.*

*The delivery of infrastructure improvements for this site also appears to be too late. For example, on page 49 it states that a new primary health care facility will only be built after the first 2000 homes are built, which will initially put additional pressure on health facilities in London Colney and Shenley. There is no information about when new education facilities would be built in relation to the housing schedule.*

*Special Policy Area: 'Media Quarter'*

*This development would be three times the size of the current Sky Studios development, using Green Belt land, which should not be used for industrial projects. We would lose an enormous area of green spaces, along with the Hertfordshire's largest stables, which is home to 200 horses.*

*It would provide very few permanent new roles for local people. Recent reports show we are hitting a peak of studios usage, and industry experts have suggested that more studio development in this area could cause the demise of Elstree Studios. Elstree Studios is a community asset owned by the people of Hertsmere, so plans which threaten it should have no place in the Local Plan. The Elstree Screen Arts Academy does not support a competing media college opening five minutes away from them.*

*It will also have a huge impact on commuter traffic through Shenley and Well End. Well End/Silverhill are also narrow country roads, which would become dangerous with increased traffic/large vehicles.*

*In conclusion, I believe that the Draft Local Plan, as it stands now, would bring significant harm to the borough and its residents.*

*I wish to attend a public meeting concerning this matter.*

*Thank you for receiving my comments*

*Yours sincerely*

## **'Save Colney' – Objection to Plan Template**

*Dear Hertsmere Planning Department*

*I am writing to oppose not only the 'draft' Hertsmere local plan in its entirety, but more specifically to oppose any development of any form or description, on site NS1: land at Coursers Road, Bowmans Cross new settlement.*

*I oppose on all grounds, specifically regarding no. 5 individual place strategies and no. 9 Protecting the greenbelt.*

*The greenbelt, including Bowman's Cross, was created to prevent urban sprawl by keeping green buffers between settlements. They are the lungs of London and the surrounding areas, including London Colney and Colney Heath.*

*Hertsmere's plan is to build (initially) 2,500 'homes' leading up to 6,000 homes on the site. The site is huge and covers the equivalent of 32,000 tennis courts and is around 4 times the size of the entire QE2 Olympic site in London. The site, despite being described, misleadingly, by Cllrs Cohen and Bright in a recent video as 'poor quality' is a high-grade swathe of lush green fields and habitat for all range of fauna and creatures including a colony of sparrows, bats, and birds of all description.*

*In addition, there is ancient woodland dotted around the entire site which is rich in its natural beauty. It is a site used frequently by the public, as well as being home to farming and livery businesses who are unanimously opposed to this ruinous, misleading, and unworkable plan.*

*The destruction of our green areas means a loss of natural habitats and is a threat to wildlife. The fact that all the open countryside in the Borough is designated as Green Belt is not identified in the Draft Local Plan as a positive attribute for the Borough. This is clearly intentional and effectively ignores the contribution that open countryside makes to the quality of life for local people, providing an imbalanced Draft Local Plan.*

*It is stated frequently in the Draft Local Plan, and in public presentations, that it is a requirement for the Council to provide for housing need in full, as assessed by the Government formula (known as the 'standard method'). This is not true. The Government has repeatedly stated that its formula for assessing housing need is a starting point, but each local Council is responsible for the preparation of housing targets for its Local Plan, considering local circumstances and constraints. The National Planning Policy Framework (NPPF) allows councils to consider the presence of designated protected land, including the Green Belt, in determining (reducing) the appropriate housing targets. In addition, the Government has repeatedly pledged to protect the Green Belt, and the Prime Minister recently stated at the Conservative Party conference that housing would not be built on greenfield sites. With its Draft Local Plan, Hertsmere Borough Council has chosen to ignore these Government statements.*

*Loss of farmlands means a loss of local produce. All of Hertsmere outside the built-up areas is designated as Green Belt which also includes designated environmental sites which are key characteristics of the district and contribute greatly to the quality of life and well-being of residents.*

*The proposed Draft Local Plan would allocate approximately 12% of the Green Belt in Hertsmere for development, and this will have a very significant impact on the character and appearance of the Borough. With all the open countryside of the Borough being Green Belt, it is unacceptable that its protection is not regarded as a specific Strategic Objective for the Local Plan.*



*A basic characteristic of the Green Belt is its permanence, and it should be a principal constraint to development and a huge asset for the Borough to be protected and enhanced for the benefit of everyone, both residents and visitors alike.*

*The 'Green Hertsmere' Vision heading in Section 3 of the Draft Local Plan makes no mention of the Green Belt and 'Distinctive Hertsmere' states simply that "the strategic Green Belt (sic) will be protected'. This is clearly not true. A single line in Strategic Objective 13 (Section 3) refers to the Green Belt and policies referring to the Green Belt comprise six pages in a 245-page document.*

*The minimal treatment of this major land designation is a significant failing of the Draft Local Plan. The reuse of previously developed land is considered mainly in terms of the release of Green Belt land and some urban sites. This greatly underestimates the likely changes which are already affecting town centres, out-of-town-centres retailing, and commercial uses more generally. CPRE Herts estimates shows that only 46 hectares of brownfield (previously developed) land across the entire borough has been identified for redevelopment.*

*The impact of the pandemic and projected social and economic trends is likely to create many more opportunities for the conversion of commercial and employment space to residential use. The expansion of permitted development rights which went into effect in 2020, further encourages conversion and change of use to residential purposes. I believe the opportunities for reuse and redevelopment accorded by all these changes are not sufficiently considered in the Draft Local Plan. Evolving changes in the nature of work, and the form and function of workspaces, are also not taken into account. A more positive house building strategy is needed as part of a detailed brownfield land review to realise the local enhancement of the existing built environment with benefits for existing and new residents.*

*We are amid a climate crisis. How will we ever meet our carbon reduction commitments if we concrete over our green fields? With the recent COP 26 event, and the government finally realising they are upsetting their core voter bases, the PM and numerous cabinet Ministers are making clear signals toward a 'pause', or cessation, of the local plan process. Hertsmere have been urged to pause their local plan process numerous times but flatly refuse, instead choosing to produce a consultation portal that is purposefully difficult to navigate and comment upon, thus minimising, or silencing, 'objections' such as this.*

*In addition, they have repeatedly refused to undertake their market research externally through an MRS (Market research society) registered company. This was clearly seen to be not fit for purpose when, in a previous so called 'consultation, the Campaign for Colney response was omitted from the consultation findings document which, it was claimed, was an 'oversight'.*

*Pollution created by traffic from the 6000 new homes: In a recent meeting between the site promoters, Urban & Civic and a well-known political group, the possibility of 12,000 homes being built on the site was discussed. Despite asking Hertsmere most senior Councillor directly to refute this number, as of today he has refused to do so. Having come out of numerous lockdowns, the impact on residents' mental health has been apparent to see, both locally and nationally. By destroying such rich habitats of nature, Hertsmere are doing little but exacerbating the mental health issues exponentially by continuing with this plan.*

*HBC declared a Climate Emergency in 2019 and the Draft Local Plan is the key mechanism for the Council to implement the requirements of this declaration. Despite the requirements of the NPPF and the Planning and Compulsory Purchase Act 2004 and subsequent legislation, the proposed policies in the Local Plan fail to take account of the need for carbon reduction targets and sustainable transport provision, amongst many other concerns, and a carbon reduction pathway is needed to meet national obligations for net zero emissions by 2050.*

*Campaign for Colney agree with the CPRE Hertfordshire that there is a need for more housing in Hertsmere as elsewhere, especially truly affordable housing for local people and key workers, but the projections used in the Local Plan are excessive and out of date. C4C also believe vehemently that housing should always be brown field first, which is an avenue that Hertsmere have been negligent in their exploration of.*

*The Draft Local Plan identifies the Southwest Herts Local Housing Needs Assessment (LHNA) as the source of data for assessing housing need for Hertsmere. However, the LHNA uses out-of-date projections from 2016 Office of National Statistics projections. We firmly believe that the latest projections, currently available for 2018 and shortly to become available for 2020, as required by technical guidance, should be used. These show a projected decrease in new households in the Borough for the plan period, and therefore a reduced number of houses which should be planned for.*

*The Council has also failed to take account of the National Planning Policy Framework (NPPF) as revised in July 2021, paragraph 11, footnote 7, which permits local planning authorities to restrict the scale of development due to planning constraints including protection of Green Belt and other designated areas and sites. Housing demand has actually fallen according to government data.*

*The housing proposed, which is loosely proposed as 40% 'affordable', is, in reality, nowhere near affordable. The average salary in the UK of £29,600, whereas the average home, at the time of writing, in London Colney costs £415,000 (with huge increases in value year on year). With a 20% Affordable Homes discount this equates to £332k. With a 10% deposit of £33,200, this leaves a mortgage of £298,800. Therefore, on a X4 mortgage, you would need to earn £74,700pa minimum. The average UK salary is £29,600. Those starting off their careers will arguably be on below average income. Without the 'affordable' discount, the picture is even more stark: A minimum of £41,500 would be required for a deposit leaving an outstanding mortgage of £373,500. The household income would therefore have to be a minimum of £93,375 at current figures.*

*If you are a young person attempting to get on the housing ladder locally, you have no chance whatsoever. With an 80kpa income placing you in the top 5% of UK earners, the only buyers would be investment vehicles, HNW individuals or property investors and developers. This entire site, which will generate (at current rates) over £10M annually through council tax revenue, not to mention new homes bonuses for Hertsmere BC, and is nothing more than council cash cow.*

*The rhetoric of 'affordable new homes for in need groups including families' is little but a red herring. Families are not in need of homes. The planning think tank 'Smart Growth UK' are unequivocal, stating that the only shortage areas for housing are the demographics of 'Single people and the elderly'.*

*Hertsmere continue hell bent in their plan to not only desecrate this site but continue with wanton abandon in their refusal to 'consult' with local boroughs. The only face to face interaction, to our knowledge, regarding this plan, since the C4C group was formed in 2017, was a brief meeting of 20 minutes between the C4C founder, Brett Ellis and Oliver Dowden, Hertsmere MP, in 2018, where Mr Dowden admitted 'if it were up to me, id say no more homes anyway'. He continues to refuse to oppose the plan despite being the self-appointed 'defender of the Green Belt'. Cllrs, including Bright and Cohen have been invited to numerous events in London Colney but have refused to attend any. Despite their refusals, they have included the new London Colney Summerfield's medical centre in their plan as a primary healthcare resource for new Bowmans cross residents. They have continually misled residents about the site, have refused to hold consultation events in the St Albans borough and, when they did hold face to face consultations, in Hertsmere, their planning department openly told mistruths to the public. When highlighted by C4C, one presenter stormed off and refused to engage with the numerous objections made.*

*There are arguably clear conflicts of interest.*

*Years have been spent opposing this site, and other Green Belt sites being developed on, in the borough. It is apparent that the vast majority of the Hertsmere housing quota is being 'dumped' away from the voter bases as again politics are put above residents' concerns. There is an ongoing refusal to listen to objection, as the refusal to hold face to face consultations, despite continuing with face-to-face council meetings shows. Promotional literature and videos are clearly biased toward this site being of 'poor quality' as the surrounding infrastructure, already choked with traffic, will be strangled should the development goes ahead. In a recent meeting, even Urban and Civic raised serious concerns as to site access.*

*I oppose this plan, in its entirety, in the strongest terms. I object to building on all sites, namely BE1, BE3, BE5, BE6, HEL152, HEL197, HEL218, HEL369, HEL388, HEL601, HEL212, HEL274, HEL175, B3, B2, B1, HEL235, HEL337b, HEL337c, B4, HEL386, HEL502, HEL505, HEL521, PB2, PB3, HEL162, HEL177, HEL216, HEL318, HEL375, R1, R3, HEL214, HEL220, HEL222, HEL231, HEL348/349, HEL390, HEL228a, HEL228b, HEL320, HEL385c, NS1, HEL345, HEL179, HEL 180, HEL199, HEL219/252, HEL509, Media Quarter.*

*Yours sincerely*

## **'Save our Green Belt' - Objection to Plan Template**

*Dear Hertsmere Planning Department,*

*I am raising a strong objection to the Draft Local Plan for Hertsmere regarding the shocking plans to build on 2500 acres of Metropolitan Greenbelt, land which is permanently protected and should not be used for housing or development. The suggestion that this Draft Plan constitutes special circumstances for building on greenbelt, is completely false.*

*I object to building on the greenbelt in ANY location in Hertsmere and on ALL sites named in this Draft Plan (in no particular order) namely: – BE1, BE3, BE5, BE6, HEL152, HEL197, HEL218, HEL369, HEL388, HEL601, HEL212, HEL274, HEL175, B3, B2, B1, HEL235, HEL337b, HEL337c, B4, HEL386, HEL502, HEL505, HEL521, PB2, PB3, HEL162, HEL177, HEL216, HEL318, HEL375, R1, R3, HEL214, HEL220, HEL222, HEL231, HEL348/349, HEL390, HEL228a, HEL228b, HEL320, HEL385c, NS1, HEL345, HEL179, HEL 180, HEL199, HEL219/252, HEL509, Media Quarter*

*My reasons for objecting to the building on the above ALL of the sites are listed here: –*

### *Clean Air:*

*The Metropolitan Greenbelt is protected land surrounding the conurbation of Greater London. We now have scientific studies linking air pollution to lung cancer and other conditions such as asthma. As we all try and reduce our emissions, the battle we have against climate change must involve the protection of our trees and open green spaces of greenbelt, with a greater understanding of the role the greenbelt plays in sequestering carbon from the atmosphere long-term. With Hertsmere declaring a Climate Emergency, we must act to PROTECT the Greenbelt and not build on it! If this is a plan for the future, then the best plan for our children involves a plan which has clean air at its core. The role of the Metropolitan Greenbelt is to help provide clean air for the whole of the area around London. This is not just a local issue for Hertsmere, it's an issue which affects us all, no matter where we live. Hertsmere has a responsibility consider the wider impact of decisions that they make locally, the impact on clean air and health of potentially millions of people.*

### *Loss of Greenbelt:*

*Inherent to the concept of the Greenbelt is its permanence. The Greenbelt has a crucial role to play in separating settlements, which otherwise would result in an urban sprawl of Radlett, Elstree, Bushey, Borehamwood, Shenley and Potters Bar, taking from those areas their unique local character and countryside atmosphere. Hertsmere should consider itself a guardian of this specially protected land which is characteristic of the borough. Any greenbelt loss would be a loss forever.*

*Size and scale: the sheer size and scale of this shocking proposal to rob Hertsmere of 1025 hectares of greenbelt (equivalent of 2500 acres) is what I object to fully.*

*Noise pollution: children in local areas will be blighted by noise with years of building traffic and then the huge increase in noise pollution with the suggested new settlements.*

*Lack of local infrastructure: small roads already busy with traffic at a standstill can take no more. The focus on development areas should be in brownfield locations with road and public transport access.*

*Amenity space: these proposed sites are covered with numerous public rights of way and bridleways – used for hundreds of years by local residents enjoying the countryside, and these would be lost. Covid has shown us how important green open spaces are for the benefit of mental health.*

*Overdevelopment: Local villages and small settlements do not need or want overdevelopment of housing on greenbelt sites, that would fundamentally change their nature. With Covid, Brexit and out of date population growth assumptions, there is not a need to increase housing in this area by 30%.*

*Harm to local wildlife: the greenbelt in Hertsmere is the natural habitat for many forms of wildlife and birds, including grey Herons, thrushes, gulls, peregrines, badgers, muntjac deer and rare tree sparrows. Owls, Red Kites, Kestrels, Buzzards, Spotted Woodpeckers, Green Necked Woodpeckers, bats, moles, snakes are amongst some of the species whose habitats would be destroyed, including Bats which are a protected species.*

*Out of date data and assumptions The data used is now out of date and is an exaggeration of what would be required. By contrast, Climate Change is a special circumstance and this is exactly why the Greenbelt must be preserved for future generations.*

*In his speech on 6th October 2021, The Prime Minister clearly stated that new homes would be built on brownfield sites and not green fields. This is now backed up by the Budget announcement prioritizing brownfield redevelopment. I want Hertsmere borough council to uphold this pledge, and preserve the greenbelt.*

*Thank you for receiving my comments.*

*Yours sincerely*

### Appendix 3 – Omissions sites on which representations were made

HELAA ref	Site Name	Settlement	Proposal
<b>HEL161 (PB4)</b>	Land East of Southgate Road – Knight Frank on behalf of LB Enfield	Potters Bar	Residential
<b>HEL171</b>	Land North of Centennial Park – Pegasus Group on behalf of Taylor Wimpey Ltd	Elstree Village	Residential and Employment
<b>HEL196</b>	Land adj to Wilton End Cottage, Radlett Lane – Sworders on behalf of landowners	Shenley	Residential
<b>HEL198,225,226</b>	Land at Brickfields and Loom Lane – Carter Jonas on behalf of The Phillimore Trust	Radlett	Residential
<b>HEL208</b>	Land North of A41, North Western Avenue – Savills on behalf of Nolan Brothers Properties	Bushey	Employment
<b>HEL236 (S3)</b>	Land at Rectory Farm, North East of Shenley – Savills on behalf of Comer Group	Shenley	Residential and Employment
<b>HEL255/HEL254</b>	Land West of Blanche Lane – Alyward Town Planning on behalf of King and Co.	South Mimms	Residential
<b>HEL321</b>	Land formerly part of Earl and Cross Keys Farm South – Turley on behalf of Miller Homes	South Mimms	Residential
<b>HEL341</b>	Allum Lane West – Alyward Town Planning on behalf of King and Co.	Borehamwood & Elstree	Residential and potential cemetery expansion
<b>EL346 (R2)</b>	Land at Home Farm, South of Radlett – Turley on behalf of Beaulieu Land Consultancy Ltd	Radlett	Residential
<b>HEL350 (S2)</b>	Land at Harper Green, Harperbury Hospital – Pegasus Group on behalf of Bloor Homes	Shenley	Residential
<b>HEL357</b>	Oxhey Lane – Hgh consulting on behalf of Oxhey Lane Developments Limited	Borehamwood & Elstree	Residential
<b>HEL367</b>	Land West of Watling Street – Neame Sutton on behalf of Catesby Estates	Radlett	Residential

<b>HELAA ref</b>	<b>Site Name</b>	<b>Settlement</b>	<b>Proposal</b>
<b>HEL370 (S1)</b>	Land adjacent to Porters Park Drive – Woolf Bond Planning on behalf of Griggs Homes	Shenley Parish	Residential
<b>HEL371</b>	Land North of Croxdale Road (Old Haberdashers Sports Ground) – Lichfields on behalf of City & Docklands Ltd and in association with Old Haberdashers’ Association.	Borehamwood	Residential
<b>HEL393 (BE1)</b>	Land South of Allum Lane – Bidwells on behalf of Endurance Esattes Strategic Land (EESL)	Borehamwood & Elstree	Residential and potential GP surgery
<b>HEL511b</b>	Land at Woodcock Hill – Pegasus Group on behalf of Taylor Wimpey Ltd	Borehamwood & Elstree	Residential
<b>HEL519a</b>	Land North of Bell Lane, London Colney – Turley on behalf of Tarmac Ltd	Shenley Parish	Employment
<b>HEL519b</b>	Land North of Salisbury Hall, London Colney – Turley on behalf of Tarmac Ltd	Shenley Parish	Employment
<b>HEL803</b>	Hilfield Farm – Aldenham Estate	Aldenham Parish	Employment
<b>HEL804</b>	Home Farm – Aldenham Estate	Aldenham Parish	Employment
<b>HEL805</b>	Slades Farm – Aldenham Estate	Aldenham Parish	Employment

\*Information contained within this table is based on the submissions made through the Regulation 18 consultation

## Appendix 4 – New sites promoted through the Regulation 18 public engagement

Promoter	Site	Primary land use promoted
Hertfordshire County Council (property)	Bushey Fire Station and Fire Station House, Rudolph Road, Bushey	Residential
HGH on behalf of Veladail Leisure Ltd	Bushey Hall Golf Club	Residential
Apcar Smith on behalf of landowner	Caldecote Lane, Bushey	Not stated (Green Belt boundary change)
Hertfordshire County Council (property)	Elm Court Community Centre, Mutton Lane, Potters Bar	Replacement community facilities and residential
Carter Jonas on behalf of McTarget and Mickel	Harper Lodge Farm	Residential
Richard Brown Planning Ltd on behalf of Star Property	Land at Kendal Farm	Residential
Savills on behalf of Nolan Brothers Properties	Land north of A41, Bushey	Data Centre
Aitchison Rafferty on behalf of Dynamic Capital	Land south of Blanche Lane, South Mimms	Residential
Chartplan on behalf of Aldenham Golf and Country Club	Land to the NE of Aldenham Golf Club	Private stroke clinic/Nursing Care Home
Lichfields on behalf of City and Docklands Ltd in association with Old Haberdashers Association	Land west of Watling Street, Radlett	Sports Club
Hertfordshire County Council (property)	Maxwell Park Youth and Community Centre, Maxwell Road, Borehamwood	Residential
Hertfordshire County Council (property)	Oakmere Community Centre, Featherstone Close, Potters Bar	Residential
Hertfordshire County Council (property)	Potters Bar Fire Station, Mutton Lane, Potters Bar	Residential
Hertfordshire County Council (property)	The Park, ESC, High Street, Potters Bar	Residential with flexibility to provide an element of commercial / retail