

## CPRE Hertfordshire initial commentary on Hertsmere Local Plan: Green, sustainable growth: Towards 2040 – additional public consultation, April 2024 (Hertsmere Borough Council)

### About us

CPRE Hertfordshire is a local countryside charity. We work to promote, enhance and protect a beautiful, thriving countryside for everyone to value and enjoy.

Founded in 1928 we are a grassroots organisation, with 800 members and a team of 4 part-time staff and a few dozen volunteers. CPRE Hertfordshire has a long history of campaigning against inappropriate development on Hertfordshire's green spaces. We also work with local groups around the county, providing advice on how they can best protect the countryside near them.

If you would like to help, then please consider [becoming a member](#) or [making a donation](#). Further information about all of our work can be found on [our website](#). Thank you.

*CPRE Hertfordshire is a Charitable Incorporated Organisation Registered charity number: 1162419. CPRE holds and manages data in strict accordance with the Data Protection Act (2018). Read our Privacy Policy on our website.*

### Introduction

This document has been compiled by CPRE Hertfordshire's planning specialists and volunteers. It provides a source of information to help members, local organisations and campaign groups develop their response to the most recent public consultation on the Hertsmere Local Plan 2024.

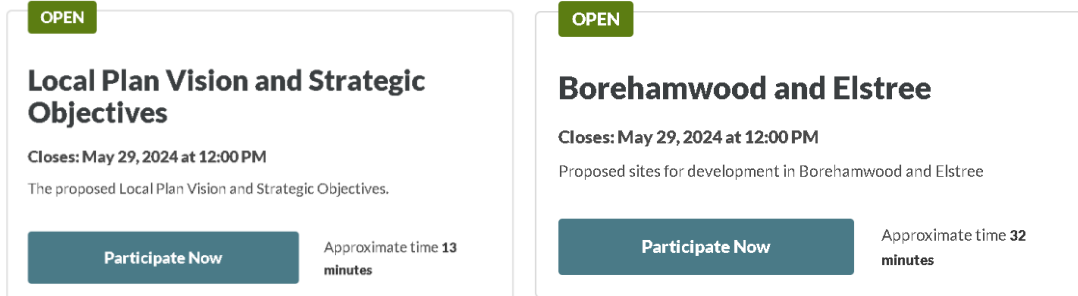
We will publish a more detailed technical report in May which can also be used to support your response.

Comments must be submitted to Hertsmere Borough Council **before noon on Wednesday 29th May 2024**, either:

- By post to:  
Planning Policy, Hertsmere Borough Council, Civic Offices,  
Elstree Way, Borehamwood, Herts, WD6 1WA
- By email to [local.plan@hertsmere.gov.uk](mailto:local.plan@hertsmere.gov.uk)
- By using the new consultation and engagement hub intended for the general public and local organisations. <https://hertsmere.civilspace.io/en/projects/hertsmere-local-plan-public-consultation#Engagements> There are 12 tabs to choose from (see examples below), each covering a section of the consultation document including individual site allocations – click 'Participate Now' to start your response. The hub

only allows for text responses. No login is required but you will need to provide your name, address, postcode and email.

Example tabs in engagement hub:



**OPEN**

**Local Plan Vision and Strategic Objectives**

**Closes: May 29, 2024 at 12:00 PM**

The proposed Local Plan Vision and Strategic Objectives.

**Participate Now**      Approximate time **13 minutes**

**OPEN**

**Borehamwood and Elstree**

**Closes: May 29, 2024 at 12:00 PM**

Proposed sites for development in Borehamwood and Elstree

**Participate Now**      Approximate time **32 minutes**

- For anyone needing to upload additional documents or technical submissions, the Council requests submissions via: <https://hertsmere-consult.objective.co.uk/kse/event/37932/>. Login is required. Aimed primarily at statutory consultees, developers, landowners and their representatives.

## General background

- The current stage of the process is a partial re-consultation on housing allocations for the Hertsmere Local Plan under Regulation 18 of the Local Plan Regulations 2012.
- This consultation seeks responses on a revised approach to housing allocations following the previous Regulation 18 consultation which resulted in major opposition to proposed Green Belt releases for housing and commercial development throughout the Borough.
- There is no obligation on Hertsmere Borough Council to include all or any of the proposed provisions in the next, formal version of the Local Plan when it is published.
- Anyone can comment to the Council on any aspect of the consultation and associated documents, in writing, through the Council's consultation platform, by email or by post.
- The Council must consider all comments made that are relevant to this document before deciding what to include in the next version, also known as the Publication or Submission Local Plan.
- The Publication Local Plan will then be subject to a six-week consultation during which anyone can make representations on whether or not the Plan is 'sound' as defined by the Local Plan Regulations.
- Any such representations that the Plan is unsound or not legally compliant will be considered by a Planning Inspector during a subsequent public examination of the Local Plan.

## Our approach

CPRE Hertfordshire believes that Local Plans are best developed using an integrated approach that puts climate change, biodiversity, well-being and social inclusion at the centre of the plan. We believe that planning is crucial to empowering local communities and making sustainable, liveable places. Ensuring everyone has an affordable home that meets their needs is essential to that, both in town and country.

Equally, it is vital that new development is planned intelligently. Our countryside is precious and finite and urgently needs better management in the face of the climate and nature emergencies. Critical to this is that land is not lost to development unnecessarily.

## The Council's additional consultation

It is important to note at the outset that this consultation by Hertsmere Council is not a full re-consultation of the Hertsmere Local Plan which was widely opposed when previously published in 2021. It is sub-titled "Additional public consultation" and it is noted in the Foreword by Councillor Nik Oakley, Portfolio Holder for Planning, Infrastructure and Transport, that this new public consultation primarily concerns housing and employment sites for inclusion in the Local Plan.

As a pre-cursor to consideration of the site allocations, initial sections of the consultation document note a revised "Local Plan Vision and Strategic Objectives" and eight key themes for the Local Plan to address. Strategic objectives then lead to the presentation of a brief "proposed spatial strategy" which refers to the previous Green Belt study commissioned from consultants.

Site criteria for new allocations are listed and it is indicated that "just over 75%" of the level of housing need which the government has identified as a starting point for preparing Local Plan (sic) is being accommodated. This refers to the Government's Standard Method algorithm which is used for calculating housing need based on population and household projections.

References are made in Sections 3 and 4 to wider environmental issues such as climate change, biodiversity, and net zero as well as encouraging an "economically viable environment which meets the needs of all our Borough's communities". These are stated as aspirations and objectives but no further detail is provided with regard to how these are to be achieved or promoted.

Subsequent sections of the consultation document identify specific sites and allocations starting with housing allocations by settlement, including the proposed new settlement at Bowmans Cross, and areas for employment.

## Our overall position

CPRE Hertfordshire acknowledges the publication of the Council's present additional consultation for 'Green, sustainable growth: Towards 2040' which we believe was necessary to respond to significant local community concerns, with specific regard to the importance of the designated Green Belt. Recent Local Plan public consultations in neighbouring Districts such as Three Rivers and Dacorum, have also indicated very considerable public concern about the potential loss of highly valued open countryside, and we note that Hertsmeire Council is committed to wider environmental objectives.

Specifically, we note the statement of 'Our Vision and Objectives', the eight key themes, and the aspiration stated in 'Future Hertsmeire': "Our precious relationship with the surroundings will be safeguarded and improved to offset the impact of any development" (page 6.).

We are concerned however that the aspirations identified in the introductory sections are not reflected in more detailed treatment in this consultation document. We note more specific concerns with regard to the overall approach adopted and omissions below.

## Local Plan Vision and Strategic Objectives

The Local Plan Vision introduces eight key themes including "Future Hertsmeire", "Green Hertsmeire" and "Distinctive Hertsmeire". We support the apparent re-orientation of "Future Hertsmeire" away from a traditional economic development model approach for the Local Plan, towards "delivering a healthy, sustainable, connected, high quality and economically viable environment which meets the needs of all our Borough's communities".

Aspirations expressed in "Green Hertsmeire" incorporate combatting climate change, achieving net zero and specifically identifying that "Hertsmeire's valued natural environment will be protected and enhanced." These however remain as statements with no further detail nor indication of the implications for specific Local Plan policy and proposals for development outcomes, other than site allocations.

"Creative Hertsmeire" notes Hertsmeire's "reputation as a nationally and internationally recognised centre for the creative industries" but the nature of this industry is changing with regard to both the location of work-force which is increasingly footloose, and the demands it makes for larger sites which are incompatible with the need to maintain and enhance rapidly shrinking open countryside. It is no longer necessary nor appropriate to locate studios and related installations adjacent to each other, particularly when other locations could benefit from levelling-up investment which is not critical for Hertfordshire.

"Distinctive Hertsmeire" identifies correctly the characteristics of urban and rural communities with "valued individual identities" ... "within a countryside setting" and notes that the "strategic Green Belt" will be protected and "improvements made to the countryside and biodiversity to offset the impact of development." The theme states that: "The strategic Green Belt will be protected, the close relationship or urban and rural communities with surrounding countryside safeguarded, and improvements made to the countryside and biodiversity to offset the impact of development(sic)".

There is no such designation as “strategic Green Belt” in the National Planning Policy Framework (NPPF) and the use of the term is concerning as it may permit an interpretation which reduces the clear requirement for protection. The need to protect the Green Belt should be unequivocal and related directly to the distinctiveness of the Borough.

With regard to the Strategic Objectives, it is disappointing that protection for the Green Belt is only 18<sup>th</sup> of the 20 ‘Strategic Objectives’ proposed for the Local Plan when it is a key and distinctive characteristic of the Borough. Further concerns regarding the protection of the Green Belt are noted below.

### Approaches to housing density

The albeit brief treatment of this issue in Section 4 recognises a relevant issue in making the most efficient use of scarce land. The consultation notes the potential for more housing on proposed sites than set out in the previous draft Local Plan. This should mean smaller and fewer incursions into the Green Belt and further assessment by the Council of this potential should be an urgent priority in Local Plan preparation.

### Providing for housing need

This consultation, as previously, includes allocations of land for housing based on the Government’s ‘Standard Method’ algorithm for calculating housing need, as noted above. CPRE continues to campaign vigorously nationally and locally for a more appropriate formula for assessing future housing requirements than the Standard Method and specifically the use of up-to-date information, as required by Planning Practice Guidance.

The modest reduction in the housing target to 75% of housing need according to the Standard Method is welcome but inadequate as, without an assessment of the scale of genuine housing need based on up to date data, it is not possible to determine whether the provision of 590 dwellings per year is justified. According to further research undertaken by the Council consultant Icen, even using the Standard method, this Local Plan target of 590 dwellings per annum could be reduced to approximately 300 to 450 dwellings per annum if 2018 projections are used.

We note that the Council appears to have taken cognisance to some extent of the National Planning Policy Framework (NPPF) in applying the policy test introduced in the NPPF paragraph 11 and footnote 7 relating to local conditions which may be applied to produce a housing target for inclusion in the Local Plan. However, we believe that the policy constraints should be applied much more vigorously to protect designated Green Belt, as was sought by the record-breaking local community responses to the previous public consultation.

### Use of the Green Belt

Approximately 600 hectares of land in the Green Belt are still proposed to be removed for the allocation of development. (See attached site analysis). CPRE Hertfordshire believes that it is critical that the commitment to the permanence of the Green Belts is maintained in

planning policy, with alterations only taking place in exceptional circumstances, as required by the NPPF.

Green Belt policy continues to be effective in preventing urban sprawl. However, at present, the rate of development in Green Belt exceeds significantly that of other protected landscapes, such as National Parks and National Landscapes. Developments in the Green Belt are land-hungry and are not providing the truly affordable homes we need to face the housing crisis. Analysis by CPRE of thirteen recently developed Green Belt projects showed that only 5% of the housing built was “social housing” (under the present definitions) which was significantly less than that called for by local planning policy in all cases (CPRE State of the Green Belt Report 2023; London 2023).

The advantages of the Green Belt are readily understood and appreciated. The Green Belt is the countryside next door for millions of people, especially in southern Hertfordshire where it provides crucial breathing space for the metropolis. The physical and mental health benefits of the Green Belt were recognised widely during the recent pandemic. Residents and visitors alike discovered countryside nearby that they did not know existed.

Green Belt land provides a vital space for nature and recreation and includes a significant number of our nature reserves, as well as double the national density of public rights of way, providing access for all. Through the protection and enhancement of Green Belt land, we can increase its natural and recreational values, as well as providing a natural solution to the climate emergency through carbon sequestration.

Crucially, the defining feature of the Green Belt is its permanence, the assurance that it will be maintained for generations to come. CPRE Hertfordshire commends the Council’s increased recognition of the need to maintain the protection of this highly valued countryside but sees this as incompatible with its continued allocation for development in the Local Plan.

In any case, with regard to specific site allocations for housing, it would be preferable for proposed housing site allocations to relate to a proposed development footprint. Any other proposals for land within the same land ownership should be the subject of separate designations within the Green Belt.

### **Bowmans Cross**

We attach significance to all Green Belt sites, and we are particularly concerned about the proposed new settlement at Bowmans Cross. The Local Plan proposes the removal of 469 hectares of land from the Green Belt in order to build 5000 new dwellings; 2600 of which are to be provided beyond the Local Plan period. It is crucial to justify the need for this proposed housing through the use of up-to-date population and household data, and to provide evidence that any such need cannot be met elsewhere.

Until then, this proposed development appears to be contrary to both national planning policy for protection of the Green Belt, and the Hertsme Local Plan's Green Belt objective. It is also entirely inappropriate to promote development beyond the plan period.

Other specific concerns include the impact of additional cars on the already highly congested local road network, and the allocation of a "reserve site for a further school or schools if required". This may suggest that further expansion of the new settlement beyond the 5,000 dwellings currently proposed is envisaged in the future. Unless such a school is required, there should be no such allocation or designation in the Local Plan, and certainly not north of Coursers Road for what would normally be classified as inappropriate development in the Green Belt

### Insufficient consideration of brownfield sites

CPRE campaigns locally and nationally for the use of previously developed sites before any other land is considered. CPRE Hertfordshire believes that there is significant untapped potential for increased density and for redevelopment of previously developed land in the Borough. Section 4 (Spatial Strategy) notes that "available brownfield land" is "very limited".

However, the Council's own brownfield register shows there is enough identified, previously developed land currently available for 2,260 new dwellings. We believe this is a significant understatement of brownfield redevelopment opportunities. The Council should do much more to make potential sites and areas available through mechanisms such as development orders and through compulsory purchase where justified and necessary if landowners are resistant. We further urge the Council to re-consider the criteria used for urban capacity and similar studies, and the potential role of windfall sites.

We also note that Hertsme has more long-term empty homes than any other district in Hertfordshire (long-term empty is defined as 6 months or greater, and excludes second homes and holiday lets). There are currently 541 long term empty homes according to government data, a very significant number. These long-term empty homes should be brought back into occupancy before any development occurs on what is now Green Belt land.

### Next steps

As noted above, this is our initial commentary on the Hertsme Local Plan: Green, sustainable growth: Towards 2040 – additional public consultation, April 2024. We are now working on a final consultation response which we will issue ahead of the 29<sup>th</sup> May closing date for the consultation.

Please also see our Site Analysis attached to this initial commentary, to understand the specific impact on the Green Belt throughout the Borough as a whole and on specific communities.



CPRE Hertfordshire Site Analysis from Hertsmeare Borough Council Reg 18 Draft Local Plan (April 2024) - page 1 of 2													V7	03/05/2024	
Proposed Site Allocation	Settlement	Site Ref	Green Belt Housing land (to be removed from Green Belt)			Brownfield Housing land (not in Green Belt)	Green Belt Housing land (in settlements washed over by Green Belt)			Number of Dwellings				Dwellings beyond Plan period	Notes (PDL = previously developed land)
			Total Site area (gross Ha)	Total Site area less Gross Developable Area (Ha)	Gross Developable area (Ha)	Total Site area (gross Ha)	Total Site area (gross Ha)	Gross developable area (Ha)	Dwellings total	Dwellings Green Belt	Dwellings Brownfield	Dwellings in settlements washed over by GB	Dwellings in GB beyond Plan Period		
<b>RESIDENTIAL SITES</b>															
1	Bowmans Cross	Bowmans Cross	HEL382	459.00	224.00	245.00				2400	2400			2600	
2	Potters Bar Golf Course	Potters Bar	HEL261 (PB2)	40.20	20.68	19.52				500	500				
3	Land north of Barnet Lane (east)	Borehamwood and Elstree	HEL209 (BE6)	12.63	5.51	7.12				250	250				
4	Lyndhurst Farm	Borehamwood and Elstree	HEL152	5.20	0.70	4.50				200	200				Part PDL in GB
5	Shenley Grange (South)	Shenley	HEL349 (New)	7.98	0.78	7.20				180	180				
6	Former Bushey Golf and Country Club	Bushey	HEL176	23.51	19.61	3.90				165	165				Part PDL in GB
7	Land north off Watford Road	Elstree Village	HEL212	2.28	0.00	2.28				140	140				
8	Land south of Theobald Street	Radlett	HEL214	3.16	0.00	3.16				130	130				
9	Organ Hill Farm	Borehamwood and Elstree	HEL218	6.60	2.80	3.80				120	120				
10	Edgewarebury Farm	Elstree Village	HEL274	7.52	3.22	4.30				100	100				
11	Land off Dove Lane	Potters Bar	HEL177	5.38	2.31	3.07				95	95				
12	Land formerly part of Ear and Cross Keys Farm (north)	South Mimms	HEL320	1.82	0.00	1.82				85	85				
13	Land North of Barnet Lane (West)	Borehamwood and Elstree	HEL197	3.00	0.80	2.20				75	75				
14	HCC 6 - former Sunny Bank Primary School	Potters Bar	HEL318	2.80	1.41	1.39				55	55				Mainly PDL in GB - application submitted for SEND school.
15	Land West of Rosway Drive	Bushey	HEL216 (New)	1.26	0.00	1.26				40	40				
16	28-30 Manor Road	Potters Bar	HEL375	0.92	0.00	0.92				40	40				
17	Land south of Barnet Road	Potters Bar	HEL162	0.71	0.04	0.67				30	30				
18	Gravel allotments, Heathbourne Road	Bushey	HEL386	0.94	0.00	0.94				25	25				
19	Hartsbourne Country Club	Bushey	HEL175	4.53	0.00	4.53				20	20				Part PDL in GB - already has permission.
20	Edgewarebury House Farm	Elstree Village	HEL1011 (New)	0.56	0.00	0.56				20	20				Mainly PDL in GB
21	Porters Park Golf Club	Radlett	HEL1029 (New)	0.52	0.00	0.52				20	20				PDL in GB but would involve replacement club house
22	Land east of Farm Way (site2)	Bushey	HEL337b	0.25	0.00	0.25				10	10				Redundant tennis courts in GB
23	Aidenham Glebe, Roundbush	Aidenham Villages	HEL345				1.17	1.17		30			30		Garden centre/nursery in GB
24	Pegmire Lane, Patchetts Lane	Aidenham Villages	HEL219				1.21	1.21		15			15		
25	Kemprow, between White House and Adelaide Lodge	Aidenham Villages	HEL180				0.71	0.71		15			15		
26	Land at Church Lane, Aidenham village	Aidenham Villages	HEL199				0.37	0.37		10			10		
27	Little Simpsons, Letchmore Heath	Aidenham Villages	HEL509				0.40	0.40		10			10		
28	Hillfield Lane, Patchetts Green	Aidenham Villages	HEL179				1.15	1.15		10			10		
29	Manor Way, Borehamwood	Borehamwood and Elstree	HEL1104				2.65			345			345		
30	Canada Life, Potters Bar	Potters Bar	HEL1106				1.85			265			265		
31	Elstree Way South, Borehamwood	Borehamwood and Elstree	HEL1101				1.35			185			185		
32	Civic Car Park, Borehamwood	Borehamwood and Elstree	HEL1102				1.20			165			165		
33	The Point, Shenley Road, Borehamwood	Borehamwood and Elstree	HEL368				0.88			120			120		
34	Elstree Way North, Borehamwood	Borehamwood and Elstree	HEL1100				0.60			85			85		
35	Stanvaotras	Radlett	HEL231				2.96			75			75		
36	Elstree Way/Railhead Road, Borehamwood	Borehamwood and Elstree	HEL1103				0.38			60			60		
37	Land west of Potters Bar Station	Potters Bar	HEL216				0.28			55			55		
38	26-30 Theobald Street, Borehamwood	Borehamwood and Elstree	HEL1005				0.19			40			40		
39	Greenacres, Bushey	Bushey	HEL505				0.78			35			35		
40	Kemp Place, Bushey	Bushey	HEL1107				0.48			35			35		
41	Land east of Farm Way (site1), Bushey	Bushey	HEL337c				0.84			30			30		
42	Birchcliffe Cottage, Bushey	Bushey	HEL502				0.29			15			15		
43	197 Darkes Lane, Potters Bar	Potters Bar	HEL1023				0.12			15			15		
44	The Park, EGC, Potters Bar	Potters Bar	HEL910				0.16			15			15		
45	Land rear of Cobden Hill	Radlett	HEL222				0.39			15			15		
46	Land rear of Catterick Way, Borehamwood	Borehamwood and Elstree	HEL1005				0.17			10			10		
47	Land and garages rear of 38-40 Watling Street	Radlett	HEL1027				0.18			10			10		
<b>RESIDENTIAL SITES TOTALS</b>				<b>600.77</b>	<b>281.86</b>	<b>318.91</b>	<b>15.95</b>	<b>5.01</b>	<b>5.01</b>	<b>6365</b>	<b>4700</b>	<b>1575</b>	<b>90</b>	<b>2600</b>	
				Ha	Ha	Ha	Ha	Ha	Ha	Dw	Dw	Dw	Dw	Dw	
													beyond Plan Period	CONTINUED on page 2	



CPRE Hertfordshire Site Analysis from Hertsmere Borough Council Reg 18 Draft Local Plan (April 2024) - page 2 of 2													V7	03/05/2024
Number of proposed dwellings in Green Belt by settlement														
					Total proposed dwellings								6365	
					Windfalls								1542	
					Existing planning permissions								1489	
					Total in Plan Period								8388	
					Plus beyond plan period at Bowmans Cross								2600	
					Total proposed in this plan including beyond 2040								11988	of which 7380 in Green Belt (including washed over settlements)
Aldenham Villages	90													
Borehamwood and Elstree	645													
Bowmans Cross (including beyond Plan Period)	5000	Including 2800 beyond Plan Period												
Bushey	260													
Elstree Village	260													
Potters Bar	720													
Radlett	150													
Shenley	180													
South Mimms	85													
<b>TOTAL</b>	<b>7380</b>	Including 2800 beyond Plan Period												
EMPLOYMENT SITES			Total Site area (gross Ha)		Gross developable area (Ha)									
Land North of Hilton Doubletree and south of Sky Studios	Borehamwood and Elstree	HEL387	2	Not in GB	2.00									
Land North of Cranbourne Road (Recycling centre)	Potters Bar	HEL394	2.48	Not in GB but new road across GB	2.48									
Casplan and Tasman House	Aldenham	HEL1041	1.3	PDL in GB	1.30									
Land south of Aldenham Reservoir	Elstree Village	HEL171 (1040)	7.1	Part PDL in GB. Already has outline permission	5.5									
Mercurie Hotel and land south east of Tylers Way	Bushey	HEL816	6.82	Part PDL in GB. Already has outline permission	6.82									
<b>EMPLOYMENT SITES TOTALS</b>			<b>17.70</b>	Only part in GB	<b>16.20</b>									
			Ha		Ha									