

## Hertsmere Borough Council Local Plan consultation

### CPRE Hertfordshire's initial analysis of Hertsmere Borough Council Planning for Growth: Draft Local Plan

#### Regulation 18 (September 2021)

#### 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 1500 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. Full details can be found on our website at [www.cpreherts.org.uk](http://www.cpreherts.org.uk) or contact us by email [office@cpreherts.org.uk](mailto:office@cpreherts.org.uk) for more information. 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 summary of our initial review, and is intended as a source of information to help members, local organisations and campaign groups develop their response to the public consultation on Hertsmere Borough Council's Planning for Growth - Draft Local Plan(Reg 18) Sept 2021.

We will publish a more detailed technical report in November which can also be used to support your response. Please note that we do not intend to comment in detail on individual sites, but we do encourage all interested parties to comment on specific sites of concern. Our compilation of proposed development sites is included in the Appendix.

Comments on the plan can be submitted to Hertsmere Borough Council by 6<sup>th</sup> December 2021 via:

- Online consultation portal on the Hertsmere.gov.uk website
- Email to: [local.plan@hertsmere.gov.uk](mailto:local.plan@hertsmere.gov.uk)
- By post to: Planning Policy and Transport Team, Hertsmere Borough Council, Civic Offices, 3 Elstree Way, Borehamwood, WD6 9SR.

#### General background

- The current stage of the process is a consultation on preferred policy options under Regulation 18 of the relevant Planning Acts.

- There is no obligation on Hertsmere 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 Portal or by email or post. Although the Council has asked you to respond to specific questions on each policy and site, there is no requirement to do so. However it is helpful to specify the policy or site on which you are commenting.
- The Council must consider all comments made that are relevant to the Draft Local Plan, 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 minimum six week consultation during which anyone can make representations on whether or not the Plan is ‘sound’ as defined by 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 point of view

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.

CPRE Hertfordshire believes 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. More new homes are undeniably needed and there is plenty of scope to use previously developed urban land (i.e., “brownfield”) and take advantage of the changes taking place in town centres, working practices and elsewhere to help address this need.

### Our primary concerns

We have several concerns about the proposed “Planning for Growth Draft Local Plan – Sept 2021” which are listed below.

#### Emphasis on economic growth at the expense of nature and the environment

It is abundantly clear that Hertsmere Borough Council (HBC) has a strong traditional economic growth agenda which is seen as beneficial in economic and social terms. Policy proposals are presented in term of opportunities for further development, effectively without major constraint. We estimate that 1025 hectares of land within the Green Belt are proposed for development: circa 961 hectares for housing and circa 64 hectares for employment and commercial space. We do not believe that the Council has given sufficient consideration to the environmental implications of losing this huge amount of countryside and green space, which is equivalent to more than 2500 football pitches.

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, taking into account local circumstances and constraints. 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 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.

### Lack of protection of Green Belt as a Strategic Objective for the Local Plan

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 is 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.

### Overprovision of housing

CPRE Hertfordshire accepts 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. The Draft Local Plan identifies the South West Herts Local Housing Needs Assessment (LHNA) as the source of data for assessing housing need for Hertsmere.

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.

### Failure to address climate change

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.

### Underestimation of the opportunities for regeneration and reuse of land

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. Our estimate 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 are 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. We believe the opportunities for reuse and redevelopment accorded by all of 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.

### Next steps

As mentioned earlier, this is our initial review of the Draft Local Plan and we are now working on a more detailed technical review which we will issue in November, ahead of the 6 December 2021 revised closing date for the consultation. In our view it is necessary to challenge the simplistic economic growth oriented direction of the Draft Local Plan which will add significant strains to services and facilities, and jeopardise many of the positive attributes of Hertsmere as a place to live, work and visit.

CPRE Hertfordshire  
October 2021



Appendix 1: Hertsme Draft Local Plan – Housing site analysis (estimates) – 18 October 2021

CPRE Hertfordshire Site Analysis from Hertsme Borough Council Reg 18 Draft Local Plan (Oct 2021)										
	Proposed Site Allocation	Settlement	Site Ref	Boundary Change	Hectares total (gross Ha)	Hectares Green Belt (gross Ha)	Hectares Brownfield (gross Ha)	Dwellings total	Dwellings Green Belt	Dwellings Brownfield
<b>RESIDENTIAL</b>										
1	New Settlement - Bowmans Cross	Bowmans Cross	NS1	Y	500	500	0	2400	2400	0
2	Wrotham Park West Barnet Road East Baker Street	Potters Bar	PB3	Y	63.5	63.5	0	900	900	0
3	Wrotham Park land off Cowley Hill	Borehamwood and Elstree	BE3	Y	68.27	68.27	0	800	800	0
4	Land south of Elstree Road (Heathbourne Green)	Bushey	B4	Y	31.84	31.84	0	800	800	0
5	Land adjacent to Little Bushey Lane & Bournehall Ave (Compass Park)	Bushey	B2	Y	48.5	48.5	0	750	750	0
6	Elstree Way Corridor Opportunity sites	Borehamwood and Elstree	BE5	N	7.5	0	7.5	685	0	685
7	Former Potters Bar Golf Club	Potters Bar	PB2	Y	40.23	40.23	0	500	500	0
8	Longview & Shenley Grange Land to the west of London Road	Shenley	S1	Y	12.1	12.1	0	240	240	0
9	Land east of Little Bushey Lane	Bushey	B1	Y	18.2	18.2	0	350	350	0
10	Land north of Watford Road	Radlett	R1	Y	35.86	35.86	0	350	350	0
11	Land north of Barnet Lane (east)	Borehamwood and Elstree	BE6	Y	12.63	12.63	0	250	250	0
12	South Mimms	South Mimms	SM1	Y	31	31	0	225	225	0
13	Former Bushey Golf and Country Club	Bushey	B3	Y	22	22	0	200	200	0
14	Land South of Shenley Road	Radlett	R3	Y	8.67	8.67	0	195	195	0
15	Dove Lane	Potters Bar	HEL177	Y	5.38	5.38	0	170	170	0
16	Organ Hall Farm	Borehamwood and Elstree	HEL218	Y	4.9	4.9	0	165	165	0
17	The Point, Shenley Rd	Borehamwood and Elstree	HEL388	N	0.88	0	0.88	150	0	150
18	Edgewarebury House Farm	Elstree Village	HEL274	Y	28.44	28.44	0	100	100	0
19	Starveacres, 16 Watford Road	Radlett	HEL231	N	3.1	0	3.1	90	0	90
20	Land north off Watford Road	Elstree Village	HEL212	Y	2.28	2.28	0	90	90	0
21	HCC 6 - former Sunny Bank Primary School	Potters Bar	HEL318	Y	2.29	2.29	0	80	80	0
22	Bushey Hall Farm Site, Bushey Mill Lane	Bushey	HEL521	Y	8.89	8.89	0	80	80	0
23	Land North of Barnet Lane, Elstree	Borehamwood and Elstree	HEL197	Y	3.01	3.01	0	75	75	0
24	Land south of Theobald Street	Radlett	HEL214	Y	3.16	3.16	0	75	75	0
25	Land adj 52 Harris Lane	Shenley	HEL390	Y	1.69	1.69	0	50	50	0
26	Land west of Potters Bar station	Potters Bar	HEL216	N	0.28	0	0.28	40	0	40
27	Manor Road	Potters Bar	HEL375	Y	0.91	0.91	0	40	40	0
28	Porters Park Golf Club	Radlett	HEL220	Y	0.76	0.76	0	40	40	0
29	Land east of Farm Way (site1)	Bushey	HEL337c	N	0.71	0	0.71	35	0	35
30	Greenacres, Heathbourne Road	Bushey	HEL505	N	0.78	0	0.78	35	0	35
31	Aldenhams Glebe, Roundbush	Aldenhams Villages	HEL345	N	1.17	0	1.17	30	0	30
32	Gravel allotments, Heathbourne Road	Bushey	HEL386	Y	0.94	0.94	0	30	30	0
33	Bushey Hall Garage	Bushey	HEL235	N	0.22	0	0.22	20	0	20
34	Land south of Barnet Road	Potters Bar	HEL162	Y	0.41	0.41	0	20	20	0
35	Hartsbourne Country Club	Bushey	HEL175	Y	4.53	4.53	0	20	20	0
36	Birchville Cottage, Heathbourne Road	Bushey	HEL502	N	0.82	0	0.82	15	0	15
37	Kemprow, between White House and Adelaide Lodge	Aldenhams Villages	HEL180	N	0.81	0	0.81	15	0	15
38	Pegmire Lane, Patchetts Lane	Aldenhams Villages	HEL219/252	N	1.26	0	1.26	15	0	15
39	Well End Lodge	Borehamwood and Elstree	HEL369	Y	0.43	0.43	0	15	15	0
40	Lyndhurst Farm	Borehamwood and Elstree	HEL152	N	3.97	0	3.97	10	0	10
41	Hilfield Lane, Patchetts Green	Aldenhams Villages	HEL179	N	1.17	0	1.17	10	0	10
42	Land at Church Lane, Aldenhams village	Aldenhams Villages	HEL199	N	0.49	0	0.49	10	0	10
43	Little Simpsons, Letchmore Heath	Aldenhams Villages	HEL509	N	0.4	0	0.4	10	0	10
44	Cobden Hill	Radlett	HEL222	Y	0.38	0.38	0	10	10	0
45	Green Street	Borehamwood and Elstree	HEL601	N	0	0	0	5	0	5
46	Land east of Farm Way (site2)	Bushey	HEL337b	Y	0.28	0.275	0	5	5	0
47	Longview & Shenley Grange Land to the west of London Road	Shenley	HEL348/349	Y						
48	Land north of St Albans Road (part of SM3)	South Mimms	HEL228b	Y						
49	Land south of St Albans Road	South Mimms	HEL385c/SM1	Y						
50	Land north of St Albans Road, east of Blanche Lane	South Mimms	HEL320	Y						
51	Land north of St Albans Road (part of SM3)	South Mimms	HEL228a	Y						
<b>RESIDENTIAL SITE TOTALS</b>					<b>985.035</b>	<b>961.475</b>	<b>23.56</b>	<b>10200</b>	<b>9025</b>	<b>1175</b>
						97.6%	2.4%		88.5%	11.5%

Appendix 2: Hertsmer Draft Local Plan – Employment site analysis (estimates) – 18 October 2021

CPRE Hertfordshire Site Analysis from Hertsmer Borough Council Reg 18 Draft Local Plan (Oct 2021)							
	Proposed Site Allocation	Settlement	Site Ref	Boundary Change	Hectares total (gross Ha)	Hectares Green Belt (gross Ha)	Hectares Brownfield (gross Ha)
<b>EMPLOYMENT SITES</b>							
52	Land east of Rowley Lane, Borehamwood	Borehamwood	Policy E6	N	13.2	0	13.2
53	Land east of Rowley Lane, Borehamwood	Borehamwood	Policy E6	Y	49.9	49.9	0
54	Land adjacent to Lismirrane Industrial Estate, Elstree	Elstree	HEL503	Y	5.16	5.16	0
55	Bushey Hall Farm, Bushey	Bushey	HEL521	Y	8.89	8.89	0
56	Land East of Furzeffield Wood, Potters Bar	Potters Bar	Not known	N	0.15	0	0.15
57	Cranbourne Road, Potters Bar	Potters Bar	HEL394	N	2.48	0	2.48
58	Tylers Way, Bushey	Bushey	Not known	N	6.8	0	6.8
<b>EMPLOYMENT SITE TOTALS</b>					<b>86.58</b>	<b>63.95</b>	<b>22.63</b>
<b>SPECIAL POLICY AREAS</b>							
59	South Mimms Motorway Services Area - Special Policy Area	South Mimms	Policy E4	Y			
60	Elstree Aerodrome - Special Policy Area	Elstree	Policy E5	Y			
61	Media Quarter Borehamwood - Special Policy Area		Policy E6				