

Common Land Team
Planning Inspectorate
3F Temple Quay House
Temple Quay
BRISTOL
BS1 6PN



commonlandcaseowork@planninginspectorate.gov.uk

Dear Sir or Madam,

Commons Act 2006: Section 16.
Application ref: COM/3262817
Proposed Deregistration of Land on Woodcock Hill, Hertfordshire

This is a reply to the Response Statement prepared by Pegasus Group on behalf of Taylor Wimpey (Jan 2021). It is prepared by Woodcock Hill Village Green Committee (the “**Committee**”) at the invitation of DEFRA. The Committee relies on the facts and matters set out in its original objection, and contests almost every point made by the Applicant in the Response Statement.

The submission provided by Pegasus Group fails to offer a satisfactory response to alleviate concerns raised by ourselves and other organisations and residents during the initial consultation. The Committee states the reasoning for this below. For the benefit of the reader please note text made in *italics* refer to text taken from Pegasus Groups response submission or the deregistration application.

RESIDENTIAL DEVELOPMENT

1. It is disappointing to note that although the Applicant agrees with the Committee’s view that comments on the potential development of the Release Land are inappropriate (para. 2.3-2.4) they continue to try and dangle the proposed benefits of housing before Defra. See e.g. the statement in para 2.2 that “it remains accurate to state that the potential for future development of the land has the potential to deliver benefits”. This is not so and there is no evidence before this application supporting that. The Release Land is in the green belt and has a number of non-statutory designations (e.g. as a Local Wildlife Site). It cannot be assumed in any way that the land will be granted planning permission for any development, and so to slide such suggestions into the application does nothing but raise the potential for regard to be had to immaterial considerations. The Applicant may well be trying to use this site for housing in future, but given that it is not allocated in the local plan and given the other concerns outlined above, there really is no basis to assume any development will come forward or be of any benefit to the locality.
2. The Committee refute the claim made in the response that *‘third parties seek to portray the Application as misleading’* Section 2.1 in the response states:
“However, the Applicant is one of the UK’s largest housebuilders and has been open and transparent with regard to their future intentions for the Release land (should this Section 16 Application be successful), stating the following in both Pre-Application consultation material and within the Application submission:

Previous materials provided by Taylor Wimpey however contradict this statement entirely as sourced from the Taylor Wimpey consultation website:

“This consultation is not linked to any potential housing development at this site and is solely related to providing an enhanced Village Green for the local community. However, if this Application to Deregister and Exchange the Village Green is successful then Taylor Wimpey intends to promote the Release land for residential allocation in the emerging Hertsmere Local Plan.” (Source: Taylor Wimpey Consultation Website)

The Applicant attempts to separate their intention of developing on the ‘Release Land’ with their application for the deregistration of the Village Green and attempts to sideline comments made by third parties as raising these concerns which is a legitimate cause for concern. The fact that Taylor Wimpey have submitted the Release site for consideration in the Hertsmere Local Plan for 110 homes before any formal application process, entirely negates their attempts to portray these two proposals as independent. Summary of the local plan can be found in Appendix 2.

“In parallel with this Application, the Applicant is promoting the area of Village Green proposed for deregistration for residential development through the Hertsmere Local Plan making process and the success of this Application will assist in facilitating this objective, either in the preparation of the next Local Plan or future iterations thereof.” (Source: Taylor Wimpey Supporting Statement)

3. The Committee finds that the ‘Replacement Land’ is neither in the right place to benefit the thousands of residents of Borehamwood who presently enjoy easy access to the existing Village Green nor does it serve a larger proportion of the local community that now dwell in new developments of which over 500 homes have been constructed near to or adjacent to the Village Green.
4. The Committee and clearly the residents (as evidenced by the objections) do not see *“the potential for future development of the land has the potential to deliver benefits, whether or not it is the role of the Application to determine the planning merits for a future application for planning permission for residential development on the Release land”*. The Committee notes that the two processes for determining future development and the deregistration are separate, however would like to note that this does not negate the concerns raised by residents and third parties in relation to the protection of the Village Green and its Common Land Status for the whole community.

PRE APPLICATION CONSULTATION

5. The Applicant seems to hide behind the fact that consultation is not a statutory requirement in an attempt to escape criticism of the shortcomings in it (para. 3.2). However, as it then recognises (para 3.3.) this is recommended by government guidance, and if consultation is undertaken it must be undertaken properly and fairly: **R (Edwards) v Environment Agency** [2006] EWCA Civ 877). So, the Applicant must engage with the substance of the criticisms levelled at it, not simply say “oh well we didn’t *have* to do it”. We refer to our original objection to highlight our concerns.
6. The Committee stand by our comments made in our objection document and believe the timing of the Pre-Application Consultation has been opportune for the applicant which was undertaken during the initial lockdown and failing and in many regards disregarding the sheer number of objections made to their proposals since. The presentation of the consultation website had also been an issue raised of several occasions.
7. The Applicant seems to hide behind the fact that consultation is not a statutory requirement in an attempt to escape criticism of the shortcomings in it (para. 3.2). However, as it then recognises (para 3.3.) this is recommended by government guidance, and if consultation is undertaken it must be undertaken properly and fairly: **R (Edwards) v Environment Agency** [2006] EWCA Civ 877). So, the Applicant must engage with the substance of the criticisms levelled at it, not simply say “oh well we didn’t *have* to do it”. We refer to our original objection to highlight our concerns.
8. It is also noted that the Applicant is trying to pray in aid stories run by the *Borehamwood Times* (para 3.4). It cannot rely on stories run elsewhere to try and mitigate concerns raised over its own consultation

ACCESSIBILITY

9. The Committee emphasizes that authors Pegasus Group acting for Taylor Wimpey have made a major error in not recognising that Borehamwood and South East Elstree are separate and very different areas falling into two different constituencies. Land West of the railway line falls under South East Elstree and not South West Borehamwood (Borehamwood Hillside), two different constituencies in Hertsmere. The Committee notes that while the Village Green is open to all residents, the ‘Release Land’ and the ‘Replacement Land’ are situated in two entirely different constituencies with the latter land, which is not suitably placed, failing to serve the *‘defined neighbourhood’* let alone the constituency of Borehamwood Hillside that the Existing Village Green currently resides. Therefore the rationale to replace the existing village green land with one outside the boundaries of the intended constituency fails to deliver any kind of enhanced village green for the intended residents or neighbourhoods.
10. Much of Pegasus Groups effort have been made to challenge concerns raised by local residents for reduced access for existing users and the ‘defined neighbourhood’ and to improve accessibility for new users outside the ‘defined neighbourhood’. The Committee finds that the overall negative impact of reducing access to the existing users in relation to the topography, physical distance and socio-economic considerations of the area, is not outweighed by the new access for other users located closer to the ‘Replacement Site’.

11. The Committee fails to recognise the accessibility solutions put forward by Taylor Wimpey offer an 'enhanced Village Green' experience for the defined neighbourhood, in particular to those with disabilities, are elderly and suffer from pre-existing medical conditions limiting mobility. Will these individuals have access to the green under the proposals, yes, but the real question is will it offer a convenient, enhanced and better Village Green for the residents? And the clear answer to this question is a categorical no.
12. Regarding 4.11 and 4.12: The path on Barnet Lane is not a suitable path for the residents of Borehamwood to walk as not only is there heavy traffic along the path, but to walk safely you have to walk in single file along the majority of the route. It is also noisy, stressful, and you cannot have a conversation with the person/people you are walking with. It is no way equivalent, or better, than accessing Woodcock Hill Village Green from the quiet residential streets of South Borehamwood. It far worse and highly dangerous.

ENVIRONMENTAL QUALITY

13. The argument put forward by Pegasus Group states that the deregistration proposals do not negatively impact upon the value of the Village Green, but actually enhance them is incorrect. We have identified three issues and problems that Taylor Wimpey's proposal has failed to incorporate or counter with:
 - A management plan or work regime for the 'release land' has not been produced and has been stated it will be fenced off from the public. Without the appropriate management plan the current habitat on site can be expected to degrade into scrubland from Neutral Grassland, which is not suitable for grassland species assemblages.
 - Ecology Solutions Preliminary Ecological Appraisal identifies the 'Release Site' & 'Replacement Site' as being of similar biodiversity quality. Therefore Taylor Wimpey's overall proposal to exchange sites offer no inherent biodiversity enhancements. Their enhancement proposals made in their application would achieve the same/better results should they choose to invest in the existing Village Green, which has been managed for biodiversity compared the Improved Grassland of the 'Replacement Site'
 - It is no secret that Taylor Wimpey are planning to eventually develop on the land should the deregistration proposals be given the go ahead. Whilst the Planning Inspectorate do not need to relate these proposals during the Deregistration Application, the end goal of Taylor Wimpey is to develop the site for housing, which will massively alter the existing land use for people and wildlife. The statement made that *'The conclusion remains that the Village Green proposals will not only avoid adverse impacts to designated sites, habitats and protected species, but that they are in fact likely to result in ecological enhancements compared to the existing situation'* are entirely false and dangerous to assume otherwise.
14. Whilst it is true that the deregistration does not involve 'works on the ground' the proposed development of the land in the future does indicate that the existing land will be severely impacted and would result in total destruction of the habitat built on. The argument that existing statutory designations afford the site protections will only remain intact should Taylor Wimpey not aim to remove these designations in the future after the site be allowed to fall in neglect without appropriate management.
15. The committee finds that the following point is a blatant attempt to reduce the effective management put in place by volunteers over a 10 year period as previously granted by Taylor Wimpey (see appendix 1)

'It is also important to emphasise that the designation of a site as a Village Green or a Local Wildlife Site does not confer a legal requirement for a landowner to undertake management of the land specifically for the purposes of conserving or enhancing biodiversity, or for recreational purposes. Furthermore, the designation of a site as a Village Green does not confer any right or consent to third parties to undertake management of the land for these reasons. As such, the position at the current time is that any maintenance of the Village Green, undertaken without the consent of the landowner is, in strict legal terms, unlawful, and as a result cannot be guaranteed in the future.'

- i) Taylor Wimpey has previously given written permission for the land to be managed (appendix 1). Herts County Council supported this and provided help for WHVG Committee and the community via their Herts Countryside Management Team. Since 2008 we have worked with many groups on the site: Young offenders, Explorer Scouts, Beavers, Cubs and Scouts, The Borehamwood Council of Churches HOPE 2010 project. The highlight of the year for the community is the coming together for Mitzvah Day. The Jewish Community set aside a Sunday in November to carry out voluntary work and are joined by members of all cultures and age groups. In 2019 this was combined with Planting 300 Rotary trees for Peace and attended by Rotary dignitaries. Oliver Dowden. Herts MP and his children worked with us to plant trees and other conservation work.

- ii) Only since early 2018 had Taylor Wimpey taken any interest in the management of this land and subsequently prevented WHVG Committee and members from carrying out essential work designed to enhance the site for biodiversity and the community as part of our present management plan, around the same time plans were being developed on their end to deregister the site
16. The Preliminary Ecological Appraisal identifies the sites as having 'limited intrinsic value', the committee find that the results are still inconsistent and require a full survey of the habitats on site, including the ponds during the optimum survey period. The committee also notes that limited reference was made to the structure and characteristics of the grassland habitat on the 'Release Site'.
 17. Increased use of the Village Green will certainly result in increased pressures from the public, especially surrounding the 5 ponds, which are sensitive to dogs entering the waterbody. The existing management plan created by the Woodcock Hill Village Green Committee takes into account pressure from the public and is managed accordingly, which includes 'soft' management systems to prevent access to sensitive areas such as using dead hedging & hedgerow planting ponds and wildflower meadows.
 18. Taylor Wimpey indicates the potential use of sheep for grazing management. Whilst a grazing regime would be welcomed to support management of a grassland on the village green Taylor Wimpey would be in breach Section 12 of the Inclosure Act 1857 makes it a criminal offence to:
 - wilfully cause injury or damage to any fence on a green;
 - wilfully take any cattle or other animals onto a green without lawful authority ;
 - wilfully lay any manure, soil, ashes, rubbish or other material on a green;
 - undertake any act which causes injury to the green (e.g. digging turf); or
 - undertake any act which interrupts the use or enjoyment of a green as a place of exercise and recreation (e.g. fencing a green so as to prevent access).
 19. Whilst the Woodcock Hill Village Green Committee does not refute that a Biodiversity Metric isn't required unless significant land use changes occur, we are opposed to Taylor Wimpey making blanket assumptions that the proposed enhancement measures on the 'Replacement Site' would warrant significant improvements on the existing 'Release site' without offering the evidence to back up these claims, especially when land is being swapped that isn't of the same type, in this case Grassland for Woodland. Without a full ecological study that Taylor Wimpey has indicated as unnecessary, using the Biodiversity Metric is merely good practice for environmental management.
 20. Taylor Wimpey flags '*biodiversity accounting methodology does not consider how baseline habitats are likely to change over time (i.e. future trend of habitat change at a site)*'. This is true as with all ecological surveys it only provides a snapshot. However, the Committee notes that the present situation is the only situation that is being compared right now. The baseline habitats will certainly be expected to change in the future and is well studied and documented as Successional Stages, without management, grassland habitats become scrub then woodland. The committee would strongly urge Taylor Wimpey to undertake a survey each year to record the site's condition to ensure no deterioration occurs to the 'Release Land' during the process.
 21. The Committee highlights that the Preliminary Ecological Appraisal failed to identify two ponds (totalling 5 across the 'Release Site'), a simple habitat which is easily identifiable, which gives credence against the validity and due diligence by the ecologist undertaking the Preliminary Ecological Appraisal.
 22. The Committee is not satisfied with the argument to minimise the impact of heavy road traffic and related issues of particulate matter, noise and lighting near Barnet Lane. Whilst we agree that we are moving to reduce our carbon footprints as a nation but it will be many years before air and noise pollution are sufficiently reduced at the replacement land to compare with the release lane. The release land will experience the same benefits for noise and air pollution reduction.
 23. It is true that the Village Green is used by recreational walkers and dog walkers, but equally is a site used for informal exercising, sport, socialising, nature watching and on snow days tobogganing, sledging and even the occasional skier. The Committee believe Taylor Wimpey has downplayed the importance of the Green for the local community in terms of informal recreation.
 24. The Committee does not recognise Appendix 3 of the Pegasus Group Response Statement as a true or accurate recording of the Intensity of Use the Village Green. The survey had been undertaken by an employee of Taylor Wimpey or Pegasus Group, which throws up the question of impartiality and accuracy of recording. The survey has also been undertaken during October during times where individuals are less likely

to use the Green and where inclement weather would deter visitors. For a more representative measurement of use a survey should have been undertaken between April - September.

25. It is stated that "*The proposals ensure the continuation of such uses through the delivery of qualitative and quantitative recreational improvements on the Replacement and Improvement land areas. For instance, the proposals incorporate a variety of walking options for users (i.e. through woodland or open grassland areas, with walking routes of varying distances and via formal or informal surface treatments) to further enhance the recreational quality of the Village Green and encourage greater use for its primary purpose as highlighted within the Inspector's Report for the benefit of the existing neighbourhood and a wider section of Borehamwood's population.* As heavily reported though the consultation period and in a large proportion of objections the local population would prefer to keep the site as it currently exists and have rejected proposals for recreation furniture to be provided that would ultimately alter the areas characteristics.
26. It is noted that the only '*health benefits*' the proposed 'Replacement Land' offers is as a result of forcing residents to walk further to enjoy a space as opposed to the one they already have access to.
27. In summary the Woodcock Hill Village Green Committee strongly refute arguments made in Taylor Wimpey's statement with regards to biodiversity and ecology. It is considered that the lack of information presented within the Village Green application in terms of future management of the entire village green, ecological reporting and fully evidenced surveys enables the Secretary of State to reject the conclusions made by Taylor Wimpey in their application. The Committee would welcome delegates from the Planning Inspectorate to visit the site to get a full understanding of the ecological importance of the site for biodiversity and people, which will be lost should Taylor Wimpey successfully deregister the village green.

CONCLUSION

28. In combination with conclusions presented within our previous statement to the Applicants proposals and that of many residents and Third Party Organisations to the proposals, we urge the Secretary of State to make the determination that the existing Village Green should maintain its existing status as Common Land and remain a valuable and well loved asset to the whole community.

APPENDIX 1 - LANDOWNER PERMISSIONS FROM TAYLOR WIMPEY

Cllr. Pat Strack
36 Carrington Avenue,
Borehamwood,
Herts
WD6 2HA

TaylorWimpey

**Taylor Wimpey UK Ltd
Strategic Land
Stratfield House
Station Road
Hook
RG27 9PQ**

30/04/09

Dear Pat

Land at Borehamwood

Further to our recent conversation I am happy to reiterate our previous email communications.

I have discussed your request with our advisors. From what you have said, it appears that you are well prepared for doing tidying up and minor clearing.

We can have no objection to such an activity on our land now that it has a village green status. However, as a company we would have no way of controlling or supervising your group's activities on the land and we can take no responsibility in any way for such activities, or any injury that might result from such activity.

As organisers, you should satisfy yourselves that you are appropriately covered with appropriate insurance for any injury or damage that may result from any maintaining or other activity that you undertake. I would also expect you to have undertaken comprehensive risk assessments and have appropriate health and safety measures in place to minimise risk and maximise emergency response. You must make sure that your experts and volunteers are safe and that proper provision is made. Please make sure that you and your expert supervisors have appropriate and up to date training and advice.

Yours sincerely



Nigel Agg
Strategic Planning Director
Tel: 07816 518675
Email: nigel.agg@taylorwimpey.com

PROJECT CONSENT FORM

This form is **MANDATORY** and needs to be completed if your project is undertaking physical improvement in an indoor or outdoor space.

HOW TO COMPLETE THIS FORM

- If any aspect of your project involves undertaking physical improvement in an indoor or outdoor space, the LANDOWNER / LEASEHOLDER needs to complete Section 1 (see the end of section 1 for projects taking place on multiple sites).
- The PROJECT MANAGER needs to sign section 2.

SECTION 1 - LANDOWNER / LEASEHOLDER CONSENT

Note for SCHOOLS

If you are a school and you lease the land from the Local Authority, the school can complete and sign this form. Please note, the signatory needs to be the Head or Deputy Head of the School.

Notes for LEASEHOLDERS

If you lease land and have a lease agreement approved that exceeds three years, your group can sign this form.

By ticking the below box and providing your contact details, you give your consent for the project to go ahead.

I am

the Landowner

(for the location of the project)



the Leaseholder

(Leaseholders need to have a lease agreement of at least 3 years or more)



Contact Details:

Title (Mr, Mrs, Ms etc)		Mr
Full Name		SAMES MALYON
Contact Address		TAYLOR WIMPEY, STRATFIELD HOUSE, STATION ROAD, HOVA
Postcode		R627 9PQ
Contact Number	Mobile	07884 869371
	Landline	
Email		James.Malyon@taylorwimpey.com

Multiple Sites (where applicable):

☐ This project takes place on more than one site.*

TESCO Bags of Help

*Please provide additional Landowner / Leaseholder details for all sites in the 'Additional Information' box at the end of this form. Include; the Landowner / Leaseholder's Full Name(s), Contact Address(es), Contact Number(s) and email address(es). You will also need to ensure that each Landowner has been consulted on points 1 and 2 of Section 2.

SECTION 2 - THE PROJECT MANAGER NEEDS TO COMPLETE THIS SECTION ONLY

Project Name	Making a Meadow
Organisation Name	Woodcock Hill Village Green Society
Position in Organisation	Work Party Organiser

All four boxes must be ticked.

- 1) ☒ I confirm that the Landowner / Leaseholder has read the project proposals and is happy with them.
- 2) ☒ I confirm that I have considered whether any permissions are required (eg. Planning Permission, project permissions (e.g trips), Environmental Agency, English Heritage) and will adhere to any conditions attached.
- 3) ☒ I confirm that any required insurances (eg. public, employer liability) are in place for the project to go ahead.
- 4) ☒ I confirm that any relevant legislation (eg. Health and Safety, Equal Opportunities, Child Protection) will be adhered to.

Signed (this can be typed in)	<i>AM</i>
Print Name	Alex Melsan
Date	04/08/2013

Additional Information (if there is anything else you wish us to be aware of please note it below. If applicable, also provide additional Landowner / Leaseholder details):-

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APPENDIX 2 - SUBMISSION TO THE HERTSMERE LOCAL PLAN

Site address/ location	Land North of Barnet Lane 1 and Land North of Barnet Lane 2	Site ref: HEL197a and HEL197b						
Breakdown of general comments received:								
<table><tr><td>Total number of comments</td><td>4</td></tr><tr><td>Statutory bodies and local interest groups</td><td>3</td></tr><tr><td>Developers/ landowners (includes site promoter)</td><td>1</td></tr></table>			Total number of comments	4	Statutory bodies and local interest groups	3	Developers/ landowners (includes site promoter)	1
Total number of comments	4							
Statutory bodies and local interest groups	3							
Developers/ landowners (includes site promoter)	1							
<div>Statutory bodies and local interest groups<ul style="list-style-type: none">Hertfordshire County Council Growth and Infrastructure UnitElstree and Borehamwood Town CouncilThe Woodcock Hill Village Green Members</div>								
Site Promoter: Planning Potential on behalf of Inland Homes								
Summary of site promoter's response:								
Key Points Raised:								
<ul style="list-style-type: none">Capable of delivering 105 new dwellings, within the first 5 years of the local planWould seek to bring both sites forward together HEL197a and HEL197bVarious constraints acknowledgedSuitable for release from the green belt, as is physically and visually containedLogical extension to BorehamwoodDisputes the housing figure stated within the PSHE document and seeks clarification in the drop from 600 to 500								
Summary:								
<p>The site promoter considers the site represents an important opportunity for new residential dwellings as it is capable of delivering 105 new dwellings, within the first 5 years of the local plan. The promoter also urges the council to not ignore small sites, especially those in highly sustainable locations and emphasises the importance of allocating small sites as well as strategic sites. The proposal has been supported by a transport strategy, and a landscape, ecology and arboricultural assessment. The promoter clarifies that whilst the site has been previously promoted as two separate parcels, they would now seek to bring both sites forward together.</p> <p>The site is located within the green belt and flood zone 1, with the northern portion of the site identified as a LWS. A small parcel of temporary structures also exists in the corner of the site beyond which are TPO trees. The site is considered by the promoter to be suitable for release from the green belt, as it is physically and visually contained by well-established man-made and natural features, and forms a small, less essential part of the gap between Borehamwood and Greater London.</p> <p>The promoter disputes the housing figure stated within the PSHE document and seeks clarification in the drop from 600 to 500 since the Issues and Options stage. It advises that the council should increase its housing target to accommodate the fully objectively assessed need (and a meaningful buffer) and the expected shortfalls arising from within the housing market area.</p> <p>The promoter considers the site to be large enough to potentially secure benefits for the council and community, through affordable housing and open space. Furthermore, the site would form a logical urban extension to Borehamwood which given its position in the settlement hierarchy should be considered the most sustainable location.</p> <p>As part of the promoter's submission the following technical studies have been submitted; transport strategy, representations in respect to landscape, ecological and arboricultural circumstances.</p>								
HBC's Comments: No new housing figure has been adopted by the council and this will ultimately be determined through the Local Plan. The council acknowledges that the latest OAN levels are in excess of 700 homes per annum as opposed to the 500 plus stated within the report. This is due to updates in the government's standard methodology to calculating the housing need with the updated national planning practice guidance stating that housing targets should be calculated using the 2014-based household projections rather than the 2016-based projections.								

The promoter has indicated that they would be seeking to bring forward both HEL197a and HEL197b together. The council does not actively discourage multiple sites being promoted as part of one collaborative scheme. We recognise that this may open up further opportunities for developing better outcomes on the ground. However, measures will need to be taken by the site promoter/s to show that the scheme is deliverable and that all landowners are willing to work together on one collaborative scheme. Further discussions will need to take place between the promoter, HBC and other statutory bodies, in relation to the site specifics, including flood management, LWS designation, TPO designation and transport.

The impact of any development in the green belt will be fully assessed. Where exceptional circumstances exist which could justify changes to green belt boundaries the council will look to minimise any harm by requiring, for example, boundary strengthening where new or remaining boundaries are insufficiently recognisable or permanent. A Stage 1 and 2 green belt assessment which has been conducted by ARUP is available to view on the council's website.

Technical studies have been conducted by a number of the developers and we recognise the work that has gone in to publishing these reports. To date, our assessment of sites has been primarily based on our own evidence base in order to ensure a level of consistency across all sites. However, as part of the process of drafting the local plan all technical documents submitted will be analysed further and where required, this technical work will need to be corroborated with statutory and specialist bodies. In some instances, additional work will have to be scoped and commissioned.

Statutory bodies and local interest groups:

N.B Respondents will be highlighted below if they have said anything that relates to one or more of the 'substantive points' listed. However, the bullet points in the 'responder' column do not directly align with the points listed in the first column and so some respondents may appear next to a sub point which they have not raised.

Substantive points raised		Responder/s
Principle of development <ul style="list-style-type: none"> Do not supporting housing development 		<ul style="list-style-type: none"> The Woodcock Hill Village Green Members
HBC's comments: There is a need for both employment and residential development within the borough. Each site will be assessed individually to determine whether it will be best suited to residential or employment where sites are to be allocated. Further discussions with the site promoter may be required to agree the best use of the site. Mixed-use schemes will also need to be considered, particularly on larger allocations.		
Environment and wildlife <ul style="list-style-type: none"> High ecological sensitivity for HEL197b due to Elstree Tunnel Grasslands LWS Low ecological sensitivity for HEL197a Potential for nesting birds in trees across both sites. Possible reptiles in HEL197b Potential ecological constraints if development affects LWS Advise that a preliminary ecological appraisal is conducted 		<ul style="list-style-type: none"> Hertfordshire County Council Growth and Infrastructure Unit
HBC's comments: Consideration will be given to the potential environmental and wildlife impacts of any new development. Further work will be required to fully assess the extent and sensitivity of wildlife and ecology onsite. Mitigation work and offsetting will be required where deemed to be necessary. Officers are liaising with both Natural England and HCC Ecology as well local bodies such as Herts and Middlesex Wildlife Trust regarding environment and wildlife issues.		
Services and facilities <ul style="list-style-type: none"> Not supported for development (together BE6) as it will have an significant impact in the immediate vicinity and an effect on the infrastructure overall 		<ul style="list-style-type: none"> Elstree and Borehamwood Town Council
HBC's comments: Hertsmere will consider the implications of both proposed and existing development when adopting the new Local Plan. The quantum and pattern of previous development will be considered when allocating any new sites, and determining the scale, location and make-up of these allocations.		

Full consideration will be given to the availability of general services and facilities, taking into consideration the needs for both existing and future residents, as having the supporting infrastructure in place are essential alongside growth. Work has already been undertaken to update our Local Plan evidence base and this includes the Infrastructure Delivery Plan – Baseline Study (2018), and Settlement Hierarchy and Accessibility Mapping Analysis (2018). The council (as part of the SW Herts area) continues to liaise with infrastructure providers and Hertfordshire County Council.

Other developer/landowners responses:

No comments received.