

The Radlett Society

and Green Belt Association

Registered Charity No. 280877

Chairman: Mrs Rosamund Gray



Planning Strategy Team
Hertsmere Borough Council
Civic Offices
Elstree Way
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Herts WD6 1WA
Dear Sirs

18 December 2018

Hertsmere Local Plan

Potential Housing and Employment Sites Consultation: October 2018

The Radlett Society and Green Belt Association (RSGBA) is pleased to submit its comments on the Hertsmere Local Plan ('the Plan').

Our starting point is that the Green Belt must be preserved, in keeping with the objectives of its establishment. Thus, we are in principle opposed to any and every development that encroaches onto designated Green Belt. We are also concerned about expansion of existing properties established within the boundaries of the Green Belt. In addition, we emphasize concern that if any of the sites identified are adopted in the Plan, their Green Belt designations will be nullified and boundaries moved so that technically you will be able to claim that you aren't actually allowing development on the Green Belt. RSGBA must campaign in the strongest terms on keeping the boundaries as existing.

The comments we make against the Plan are therefore made in this context. However, we are aware of the pressures on the Council who have to contribute to the realisation of targets imposed by central government. We are therefore prepared to countenance some limited development that encroaches on the Green Belt to help meet these demands, provided such development is on small appropriate sites, is carefully designed to meet the real needs for housing¹, in keeping with neighbouring properties and of modest size.

Our comments are in two sections:

- Section 1: General comments and principles
- Section 2: Comments on specific sites in the Plan

We would be pleased to have the opportunity to discuss our comments further with you; please contact the undersigned in the first instance.

Yours sincerely

Rosamund Gray
Chair, RSGBA

Please reply to: Mrs Rosamund Gray, 19 Loom Lane, Radlett WD7 8AA

¹ As we say later in this submission, we see the real need in and around Radlett is for small properties – two and three bedrooms – and not large mansions.

Section 1: General comments and principles

Initial general comments

1. Our starting point is that the Green Belt must be preserved, in keeping with the objectives of its establishment. Thus, we are in principle opposed to any and every development that encroaches onto designated Green Belt. We are also concerned about expansion of existing properties established within the boundaries of the Green Belt. Green Belt land once developed is lost for future generations; its openness and amenity value gone forever.
2. We note that the Foreword to the Plan states that the Council is asking for opinions on the most appropriate locations for development '*with the least impact on the environment*', but there is no reference at all in the Foreword to opinions on impacts on the Green Belt, which in Hertsmere is of fundamental importance in terms of national planning policy.
3. We are disappointed that the Introduction to the Plan misleadingly implies that full housing need must be planned for, which is untrue by virtue of paragraph 11 of the new National Planning Policy Framework (NPPF). 'Housing Need' and 'Housing Requirement' are not the same thing. The latter is the number of houses planned for after the consequences of providing for the former has been assessed, taking into account such matters as policy constraints in national policy. The Council is able to set a lower housing requirement consistent with paragraph 11 of the NPPF: this does not seem to be mentioned in the Plan and the omission undermines the credibility of the Council's approach based on meeting all of the assessed housing need in the Borough.²

Evidence and Reasoned Justifications for Objections

4. The Government has repeatedly said that neither housing need nor demand can be an 'exceptional circumstance' that allows removal of land from the Green Belt. But neither the 2018 NPPF nor the accompanying Planning Practice Guidelines makes this clear, leaving Councils, developers, Planning Inspectors and bodies such as ourselves to make the argument at every Local Plan examination, as we do now.
5. Without a clear guide from Government, the 2018 NPPF can be interpreted as opening the door to meeting unlimited development needs in so-called protected areas, including the Green Belt, provided that Councils have attempted to optimise the use of previously developed land. We do not agree with this interpretation.
6. Most of the sites around Radlett that have been put forward are just those put forward by landowners and promoters. They are not a considered proposal of where housing would be best placed, for example near existing centres of employment, shopping and services such as Borehamwood, Potters Bar and Bushey.
7. It seems inevitable that new homes in Radlett will be large detached houses with five or more bedrooms. This is because of developers' profit motivation: they will not build in a way that undermines market prices. Yet what Radlett needs is smaller houses: a mix of semi-detached and terraces, or two or three bedrooms, to provide for young families and downsizing. We think that the Council must set this as a priority and indeed a condition for sanctioning development sites – that there are no new larger homes on new sites as Radlett has enough such properties already.

² We have seen the submission by the Campaign to Protect Rural England (CPRE) Hertfordshire which makes this issue more fully and we would associate ourselves with their comments.

8. It is also necessary to consider the actual demand for housing. The Ministry of Housing, Communities and Local Government's (MHCLG) timetable for delivery of the target housing is phased over 15 years, and it's extremely unlikely that this government's writ [or Hertsmere Council's] will run for that period.³ In the period from 2014 to 2016, UK population growth projections showed a fall; who knows what the population trend will be over the next five years, let alone 15? The latest nation projections (Sept 2018) show a fall in the number of households in Hertfordshire in every year up to 2041 from those used as a basis for the housing allocations in the County's Local Plans. By the year 2033, the Office for National Statistics (ONS) expects 550,000 households in Hertfordshire. This is down 32,000 from the number previously projected. NPPF requires these projections to be the starting point for calculating 'Housing Need' before deciding how many new houses should be allocated in Hertsmere's Local Plan.

Grounds for Objections to Hertsmere's 'Planning for Growth' proposals

9. In the NPPF, paragraph 11 states that any strategic policy proposals should, as a minimum, provide for objectively assessed needs for housing and other users, as well as any needs that cannot be met within. **Unless:**
- a) The application of policies in this framework that protect areas or assets of particular importance⁴ provides a strong reason for restricting the overall scale, type and distribution of development in the plan area;
 - b) Any adverse effect of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
10. Therefore, since all the offered sites around Radlett are in the Green Belt, they have designated, protected status. The Green Belt safeguards open countryside and wildlife habitats around Radlett; many are good-quality cultivated agricultural land.
11. In addition, the Green Belt designation:
- is intended to prevent settlements coalescing by maintaining separation distances;
 - ensures openness by the absence of any development;
 - is intended to be permanent.
12. As we have already stated in our introduction, the Planning for Growth housing figures should be seen as 'targets' not 'needs'.

Radlett infrastructure

13. Current infrastructure in and around Radlett is inadequate to support the numbers of homes that are contemplated in the Plan. The numbers would be very costly and hard to integrate into Radlett's current set-up.
14. A 'village extension' of 500 homes should trigger at least a new 2-form entry primary school, a medical centre⁵, extra bus services, dentists etc. But, based on the experience at Porter's Park, Shenley, there is no guarantee that developers would honour any commitments to provide these in a phased programme following the initial housing allocations.

³ We would point to the John Prescott 2003 East of England Plan for 1.5m homes that has been quietly forgotten.

⁴ This includes land designated as Green Belt and Areas of Outstanding Natural Beauty

⁵ Note that the current 'Red House' surgery in Radlett is already at capacity.

15. Existing infrastructure is creaking. For example, the main water pipe through Watling Street recently burst three times in a week. It is probably decades old and needs replacing and enlarging to cope with all the extra demands of recent building, let alone even more. Gas, electricity and other services are similarly stretched. Who will pay for these?
16. In recent years Radlett has lost both its Fire Station and Police Station while the number of buildings and population have increased. Hertfordshire County Council does not seem to have updated its Community Safety assessment for Radlett since 2006 when it closed the Fire Station, perhaps because the increased risks might justify a Fire Station now?

Transport and highways

17. Adding 500 homes to Radlett would inevitably bring more traffic on to Radlett's busy streets. This is particularly the case with developments on the edges of Radlett which are clearly only going to be taken by people who will drive to Radlett centre for shopping and trains.
18. The streets, especially Watling Street and Watford Road, and the key exits of the A41 roundabout and the Harper Lane bridge, are already significantly congested at 0800-0930 and 1630-1830. More traffic will bring extra atmospheric pollution from queuing vehicles in the village; the levels of exhaust gases seem high already.⁶
19. There is already a significant development in hand on the Harperbury Hospital site; this will be a 'car based' development and although not all residents will travel to Radlett, many will and so put additional pressure on Radlett roads and car parks, especially the Harper Lane bridge. This has to be a major factor against any further major development in Radlett without significant infrastructure updating.⁷
20. Large lorries often travelling long distances come through Radlett because it is slightly shorter distance than via motorways according to Sat Navs. Local lorry bans like on Watford Road and weight limits over certain bridges are ignored by drivers and not enforced by Police.
21. Facilities for pedestrians and cyclists have not received any real investment in the past ten years, yet traffic levels appear significantly higher with consequent safety implications. With current government policies to encourage more cycling, it is surely vital that more investment in this area is prioritised.
22. Parking facilities are already close to capacity on working days. There is no real scope to expand the two main car parks at Newberries Parade and the Rail Station.

⁶ The situation would be exacerbated by all the vehicles and the operations associated with developments in housing; dust, noise and parking problems.

⁷ There are also three developments in hand in the lower half of Watford Road which will add to pressures on that road, though these developments are at least within walking distance of Radlett centre.

Section 2: Comments on specific sites in the Plan

These comments on sites in and around Radlett must be read in the context of the general points we have made in Part 1 of our submission.

1. We first consider the three major development sites:

H3: Strategic Housing site West of Aldenham School, Letchmore Heath

This is active, good agricultural land. The character of this small village would change dramatically. The site is unsuitable for development as it has no proper access to main roads: two of the existing three lanes leading to the village are single track with no obvious way of expanding them. Present traffic to and from Aldenham and Haberdashers Schools is already too great for the capacity of the lanes at peak times; there is no capacity to absorb any additional traffic. There are no bus routes and the roads would make it impractical to introduce any. Thus this would be a wholly car-based development despite there being, as we have said in the previous paragraph, no capacity on the existing roads. Infrastructure is at present at full stretch and further development would not be sustainable. There are no shops in the village.

We strongly oppose this scheme.

R1: Strategic Housing site, Kemprow Farm, N.W. of Watford Rd. 560 dwellings.

This would be significant loss of active Green Belt. A key challenge is the need for major infrastructure development near existing sewage works (which in any event makes the site unattractive for housing). There are main Power Lines going across the land which preclude adjacent housing. This is a site well outside Radlett village centre, not within walking distance of shops and transport. It would be a car-based settlement which would have serious traffic consequences on Watford Road and on the roundabout on the A41. Although car use would be the main form of transport, given distances, it would be necessary to upgrade Watford Road for pedestrians and cyclists. The size of development would require the site to provide a new Nursery and Primary school, together with a new Medical centre. Such a development could only be contemplated if it provided a clear majority of Affordable Housing, particularly small family dwellings.

We strongly oppose this scheme.

R2: Strategic Housing Site, delivering a New Garden Suburb. Land south of The Ridgeway (Home Farm) 560 dwellings

This is active Grade 2 Agricultural Land within the Green Belt. A major concern is that this development would lead to the merging of Letchmore Heath and Radlett, coalescing the two settlements in direct contravention of Green Belt and settlement policy. It would have major visual impact. Again, major challenges are in terms of the distance to shops and Radlett Station. Inevitably this would be another car-based settlement, leading to further traffic pressure on Cobden Hill/Watling Street. The access to Watling Street is very limited. Although car use would be the main form of transport, given distances, it would be necessary to upgrade Cobden Hill/ Watling Street for pedestrians and cyclists and turn Common Lane into a main street for two-way traffic though it is not clear how this could be achieved. There are no bus routes in Common Lane or along Watling Street from the Elstree direction. The size of development would require the site to provide a new Nursery and Primary school, together with a new Medical centre. Such a development could only be contemplated if it provided a clear majority of Affordable Housing, particularly small family dwellings.

We strongly oppose this scheme.

2. We now consider six sites that we oppose in principle as they are all on Green Belt land. However, mindful of the need to generate some additional dwellings, they are sites we would consider for development provided permission is only granted against proper, enforceable conditions.

199: Church Lane, Aldenham 15 dwellings

This is a modest development extending an existing development and can be screened from the main road. It is less objectionable, provided the development is in keeping with existing development or (ideally) of small housing. We note it is on a bus route.

214: South of Theobald St 90 Dwellings

Although this extends Radlett development into an area not currently subject to any dwellings, it faces already developed land and is bounded by the railway. We can see some logic in releasing this site for development, even though it is currently active farmland. We note that power lines would need to be buried and that careful consideration would need to be given to access to Theobald Street. It would be relatively close to the centre of Radlett and would be particularly suitable for small, affordable housing.

213: Land rear of Ridgeway 25 dwellings

We could consider this development but are not convinced it is suitable for as many as 25 dwellings; any development needs to be small, low level development to lessen impact on Green Belt and include proper screening. There would need to be careful consideration of vehicular access with no additional routing down Loom Lane which cannot be made suitable for extensive traffic.

225: (20 dwellings) and 226 (15 dwellings) Land adjacent to Ridgeway/Loom Lane

These two small sites are possible but again we are not happy with the indicative numbers of dwellings. Both would mean loss of woodlands and would require significant upgrade of access routes. At the moment access is via footpaths and on to narrow part of Loom Lane (no footpath pavements, not safe walking).

231: Starveacres 16, Watford Rd 90 Dwellings

This site is clearly possible for development but given its relative closeness to Radlett Centre, it should be considered for an elderly-based development (c/f Slade Court) and for affordable, small houses. However, it would inevitably place additional traffic strain on Watford Road; it would certainly need a roundabout to access Watford Road and must lead to widening on Watford Road in the 'choke point' between Gill's Hill Avenue and High Firs.⁸

⁸ We reiterate the earlier point we have made about the pressures on Watford Road which are going to be exacerbated by the three developments that are in hand on the lower half of the road.

3. We do not consider the remainder of the sites identified as possible for development as suitable for development, even with the sort of conditions we have outlined elsewhere in our submission.

198: Land to the south of the Ridgeway

This site is nominally brownfield in that there are existing commercial buildings on part of it. However, the site is well away from existing development and in Green Belt. It is not suitable for expansion; there is no proper vehicle access to the site and minimal services. Allowing this site would be very damaging in terms of the signal it would send of permitting what would in effect be a new development within the Green Belt, detached from Radlett. It would need a new road constructing to it, presumably along the existing track, which itself would intrude on the Green Belt and alter the character of the area significantly.

220: Porters Park Golf Club 30 dwellings

We do not think this site can be properly considered until it includes full discussion of the consequences for the existing club, in terms of the relocation of the car park and club house. We suspect that part of the plan is to relocate some or all of these facilities into Green Belt land, which would be unacceptable.

Such a development would be the start of joining Radlett with Shenley which needs to be strongly resisted. The traffic consequences with access onto Shenley Road which is winding and at times dangerous needs to be carefully considered.

We also question the suitability of development so close to an active golf course; we note that there are already issues with stray golf balls going on private gardens and wonder how well the golf club and development will co-exist. It is highly probably that there would be disputes from one side or the other in due course.

222: Land Rear of 5-15 Cobden Hill

This has been considered in the past and development refused. Difficult access to the site makes it impractical. We cannot see that anything has changed from its previous consideration. We also understand that there are issues around ownership of the land.

345: Aldenham Glebe, Roundbush 35 dwellings

Although seemingly a modest number of dwellings, it would completely alter the character of a hamlet. It is not sustainable in an area with no shops. The extra traffic would create problems on the very limited existing roads.

358 Land south of Shenley Rd 230 Dwellings

This development would be a massive extension to the existing Newberries estate; it has been considered a number of times in the past and rejected for development. We do not see that there is any reason to change the previous conclusion. As with sites R1 and R2, it is of a size that would require additional provision of school and medical facilities; its distance from Radlett centre and station would mean it also is a car-based development with consequent strain on local roads and parking that could not accommodate the demand. The land is important natural Green Belt with woodland and is well populated with wildlife. It is a geological site with a rare deposit of "Pudding Stone".

Access to the site would cause problems on Shenley Hill if that is envisaged: it is not a road that could accommodate significant extra traffic. We do not believe that access from Williams Way would be easy because of existing land ownership.

4, Additional site

We would point to one small additional site that is not currently included in the plan. This is the land behind the Oakway parade of shops. This is currently developed with a range of warehouses and other commercial uses but does not seem to be well used. We would suggest that it is explored as possibly suitable for development for housing.