

This document is intended to help local residents who wish to give feedback on Hertsmere Borough Council's Local Plan - "PLANNING FOR GROWTH" during this consultation phase.

NB: deadline to complete and submit feedback is Friday, 20 December 2018

How can I provide feedback:

- Consultation Portal web address: <https://hertsmere-consult.objective.co.uk/portal/>
- By Post: Pick up a form from the Post Office or The Hub. The address is printed on the form.
- By Email: local.plan@hertsmere.gov.uk.
- Please feel free to cc Shenley Parish Council at clerk@shenleyvillage.org or Shenley Neighbourhood Planning Group at nicky.beaton@shenleyvillage.org

Which sites should I include in my feedback?

If you use the Consultation Portal there is a comment box at the end of each section so you can comment on any or all of the sites that have been put forward for development – both in Shenley Parish and in neighbouring areas such as Borehamwood and Potters Bar.

We recommend you look widely at the sites that will affect Shenley Parish the most and feedback on those.

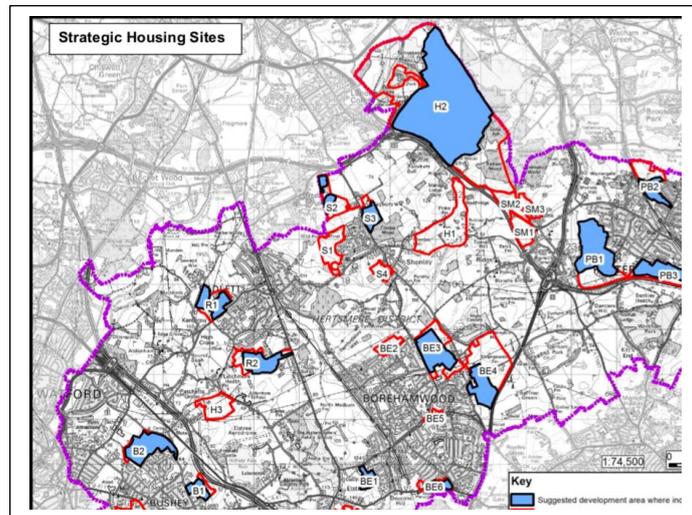
At the end of the consultation document there is a 'general' feedback section where you can comment on the consultation process itself. For example, whether or not you have found the documentation provided easy to understand, whether sufficient time and information has been provided and whether or not Hertsmere have made sufficient effort to engage with local communities – as well as any other thoughts you have about development in Hertsmere in general and Shenley in particular.

It is also quite helpful to look at comments that other people have made on the portal – these are available to view once you have logged in.

How to use this document:

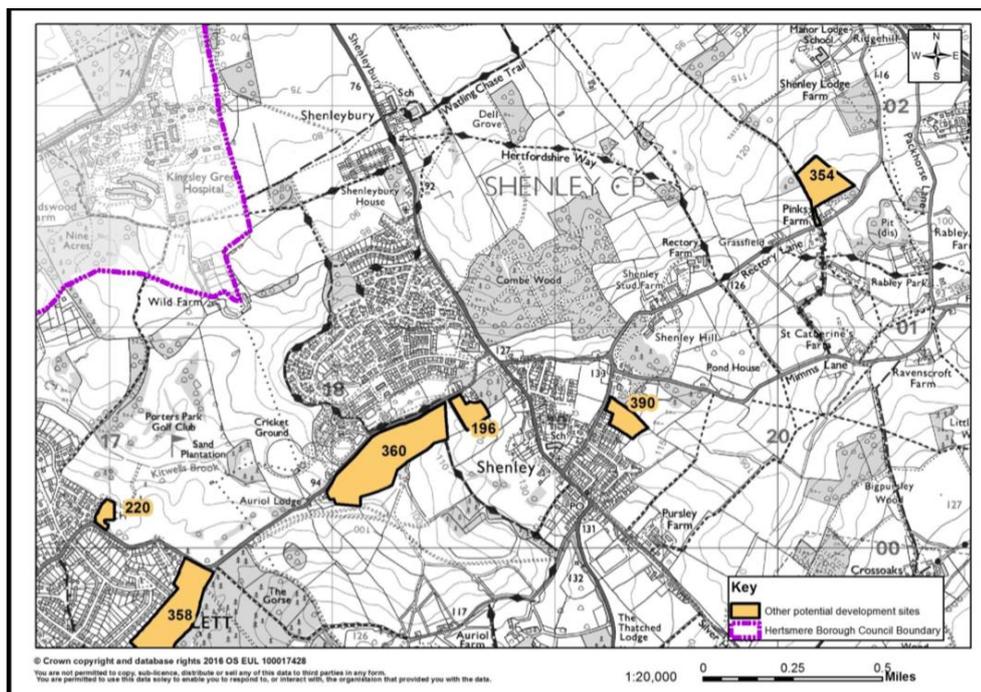
- We have created a chart (pages 3- 15) for each of the large (strategic) sites that would affect Shenley:

- S1 – See pages 3-4
- S2 – See pages 4-5
- S3 – See pages 6-7
- S4 – See pages 7-8
- H1 – See pages 8-10
- H2 – See pages 10-11
- BE3 – See page 12
- BE4 – See pages 13-14



- There is also a section considering the **smaller sites** (under 250 houses) that would affect Shenley Parish. See pages 14-15

Smaller sites put forward for development



- Finally there is a section giving ideas suitable for the General Comments Section which can be found at the end of the Local Plan Consultation document on the Hertsmere Portal. See pages 15-18

Site: S1	Location: Land West of Porters Park Drive (back of Porters Park next to Cricket club)
Number of homes: 530 (to include flats and family housing)	Status: Green Belt. Stage 2 Green Belt assessment does not recommend this site for further consideration but this is not the only criteria that will be used to judge a site.
<p>Notes: Land parcels around S1 boundaries are being put forward in different parts of the plan (Radlett section) and also adjoining land has been put forward in the St Albans Local Plan which means this site has potential to be joined to other developments that we are unable to feedback on at present.</p>	
Possible feedback points	
<p><u>Sustainability</u></p> <ul style="list-style-type: none"> • Limited bus service on Radlett Lane and Porters Park Drive means development of this site would go against Local Plan Core Strategy Objective 8 – “to raise levels of access by seeking development in locations not dependent on access by car” • Site does not comply with Government guidelines set out in the National Planning Policy Framework on sustainability—it is not within walking distance of a train station or serviced by a bus that runs every 3-5 minutes. <p><u>Environmental Impact</u></p> <ul style="list-style-type: none"> • Flood zone (FZ3) and local wildlife site within and adjoining the southwest of the site • Landscape and visual impact considerable. • there are a number of protected trees around the perimeter of the site. • It is extensively used by walkers – Shenley and wider community. • Extending Porters Park here would spoil part of the Timberland Trail--the Cow Bank path would run between the two halves of the enlarged Porters Park development. • The number of additional cars on the roads would increase levels of pollution in the area significantly. This goes against HBC’s Local Plan Core Strategy objective of protecting and enhancing the environment in Hertsmere by addressing the impacts of pollution. <p><u>Road Traffic, Safety and Journey Times</u></p> <ul style="list-style-type: none"> • Only vehicle access appears to be from Radlett Lane – development of this site would mean 1000+ additional cars using Radlett Lane to get anywhere. • That many additional cars plus cars from other possible developments would severely impact journey times and traffic congestion. This is a two lane road. • Homes on this site would be car-dependent as there is little to no public transport alternative. • Building here would go against sustainable building principles in NPFF – building within 5 minute walk of a train station. <p><u>Infrastructure issues (schools, doctor’s surgeries etc)</u></p> <ul style="list-style-type: none"> • Shenley Primary School has not scope for growth on current site so any significant growth in Shenley would require a site for a new primary school. This is not within Hertsmere Borough Council’s power to deliver (The County Council delivers infrastructure such as a roads and schools) • Lack of local secondary school provision. • Gateways Surgery has closed its books to new patients so there will be no healthcare access for 	

people in this development. Adding healthcare facilities is not within Hertsmere Borough Council's power to deliver.

- What plans are there for additional capacity for intensive care units, maternity units, cancer units and other critical healthcare services to support the greatly increased population?

Maintenance of Green Belt:

- This area forms an essential gap between Shenley and Radlett. Developing this site would go against the Local Plan Core Strategy objective of preventing urban sprawl and the coalescence of towns. Gap between Shenley and Radlett is currently a little over 0.5m apart at the closest point.
- Loss of Green Belt land

Misc:

- There are statutory and locally listed buildings nearby within Shenley Park/Porters Park estate and at Wild Farm/White House to the north that would be impacted by a new development
- Proposed build density exceeds Shenley's requirement for new housing units in the next 15 years as stated in Aecom report dated January 2018 commissioned by Shenley Neighbourhood Plan Steering Group.

Site: S2	Location: Land west of Shenleybury Cottages (Harperbury Hospital) – between Harperbury Hospital site and Porters Park
Number of homes: 230 homes (adding to the 206 currently under construction at Harperbury Hospital site)	Status: Green Belt. Stage 2 Green Belt assessment does not recommend this site for further consideration but this is not the only criteria that will be used to judge a site.
<p>Notes: There are two 'blue' parcels of land in S2. One north and one south. S2 adjoins the new development of 206 homes on the Harperbury Hospital site. There are additional land parcels within and adjoining the former Harperbury hospital site that are not currently part of this consultation. Some of this land lies within the borough of St Albans. The joining up of all of these sites could possibly create a new village / town of 1000-2000 homes.</p>	
Possible feedback points	
<p><u>Sustainability</u></p> <ul style="list-style-type: none"> • Limited bus service on Harper Lane means development of this site would go against Local Plan Core Strategy Objective 8 – “to raise levels of access by seeking development in locations not dependent on access by car” • Site does not comply with Government guidelines set out in the National Planning Policy Framework on sustainability—it is not within walking distance of a train station or serviced by a bus that runs every 3-5 minutes to local services or train station. <p><u>Environmental Impact</u></p> <ul style="list-style-type: none"> • The number of additional cars on the roads would increase levels of pollution in the area significantly. This goes against HBC's Local Plan Core Strategy objective of protecting and enhancing the environment in Hertsmere by addressing the impacts of pollution. • Archaeological site covering part of the site 	

- Landscape and visual impact considerable.

Road Traffic, Safety and Journey Times

- There will be substantial increase in traffic headed into Radlett to access mainline train station and in traffic going down Bell Lane to access the M25. Both of these stretches of road are already a problem during peak times or when there is an accident on the M25 and people exit at Junction 22 to cut through Shenley to access the A1.
- Harper Lane is a narrow road, with a single track bridge where it meets the A5. It will already be impacted by the 206 homes that are currently being built beside this site (in St Albans District).
- If this site and other potential nearby sites are developed, the additional traffic would make commuting at peak times unbearable. Residents' timely access to London Colney, Radlett, Shenley, Borehamwood and St Albans would be severely compromised.
- The site is entirely car dependent with no bus routes or shops/services nearby so traffic impact on local roads would be immense.
- Need for a full traffic survey to understand issues before any new homes are approved.
- Building on this site would go against HBC's core strategy objective of raising levels of access by seeking development in locations not dependent on access by car and is against the sustainable building principles in NPF – building within 5 minute walk of a train station.
- Located a considerable distance from public transport to London (a train station). Residents travelling to London for work would most likely commute all the way to Elstree Borehamwood station as it is a Zone 6 station leading to yet further rush hour build up through Shenley.
- There is already a lack of parking places at Elstree Borehamwood Station & Radlett—this situation would be considerably exacerbated.

Infrastructure issues (schools, doctor's surgeries etc)

- Shenley Primary School has no scope for growth on current site so any significant growth in Shenley would require a site for a new primary school. This is not within Hertsmere Borough Council's power to deliver. (The County Council delivers infrastructure such as a roads and schools)
- Gateways Surgery has closed its books to new patients so there will be no healthcare access for people in this development. Adding healthcare facilities is not within Hertsmere Borough Council's power to deliver.
- What plans are there for additional capacity for intensive care units, maternity units, cancer units and other critical healthcare services to support the greatly increased population?
- Lack of local secondary school provision.

Green Belt issues

- This land should not be developed as it stops the coalescence of Shenley and the Harperbury settlement – one of Hertsmere's own core strategy objectives.

Misc:

- Concern about "Strategic Land promoted" red line – this may indicate that the site would become much larger than just the blue area indicated on the map now.
- If all the development proposals for the Harperbury hospital area that Hertsmere and St Albans Councils are considered alongside this land, the Harperbury area could potentially expand to 100-2000 new homes (effectively another village/town).

- How would development of this site be coordinated with development on adjoining site in St Albans's Local Plan?
- Proposed build density exceeds Shenley's requirement for new housing units in the next 15 years as stated in Aecom report dated January 2018 commissioned by Shenley Neighbourhood Plan Steering Group.

Site: S3	Location: Land off Black Lion Hill (east side) - Rectory Farm land next to Coombe Wood & St Botolph's Cemetery, Farm Close business units and Clore Shalom School to the north.
Number of homes: 370	Status: Stage 2 Green Belt assessment does not recommend this site for further consideration but this is not the only criteria that will be used to judge a site.
Notes: Notes in consultation document say that this site could be expanded further to include agricultural land to the east. This means it could possibly connect to the H2 site (4000+ homes projected on H2).	
Possible feedback points	
<p><u>Sustainability</u></p> <ul style="list-style-type: none"> • Limited bus service on Black Lion Hill • Development of this site would go against Local Plan Core Strategy Objective 8 – “to raise levels of access by seeking development in locations not dependent on access by car” • Site does not comply with Government guidelines set out in the National Planning Policy Framework on sustainability—it is not within walking distance of a train station or serviced by a bus that runs every 3-5 minutes. <p><u>Environmental Impact</u></p> <ul style="list-style-type: none"> • Area of protected woodland to the northeast. The site also adjoins Coombe Wood which is ancient woodland. • Landscape and visual impact considerable. • Development of site beside Black Lion Hill would have a significant negative visual impact on the approach to the village. Brand new housing estate vs. open fields leading to country village. • The number of additional cars on the roads would increase levels of pollution in the area significantly. This goes against HBC's Local Plan Core Strategy objective of protecting and enhancing the environment in Hertsmere by addressing the impacts of pollution. <p><u>Road Traffic, Safety and Journey Times</u></p> <ul style="list-style-type: none"> • That many additional cars plus cars from other possible developments would severely impact journey times and traffic congestion. Black Lion Hill is a narrow two lane country road. • Homes on this site would be car-dependent as there is little to no public transport alternative. • Building here would go against sustainable building principles in NPFF – building within 5 minute walk of a train station. • No bus service every 3-5 minutes to a train station or local services <p><u>Infrastructure issues (schools, doctor's surgeries etc)</u></p> <ul style="list-style-type: none"> • Shenley Primary School has not scope for growth on current site so any significant growth in 	

Shenley would require a site for a new primary school. This is not within Hertsmere Borough Council’s power to deliver. (The County Council delivers infrastructure such as a roads and schools)

- Lack of local secondary school provision.
- Gateways Surgery has closed its books to new patients so there will be no healthcare access for people in this development. Adding healthcare facilities is not within Hertsmere Borough Council’s power to deliver.
- What plans are there for additional capacity for intensive care units, maternity units, cancer units and other critical healthcare services to support the greatly increased population?

Maintenance of Green Belt:

- Site prevents sprawl and maintains the gap between nearby settlements and prevents “ribbon development” along London Road.
- Developing this site would go against the Local Plan Core Strategy objective of preventing urban sprawl and the coalescence of towns
- Loss of Green Belt land
- There are many rights of way across the fields and they are extensively used by Shenley residents and the wider community.

Misc:

- Need more information from HBC on mix of homes, how they will meet local need and how will the style of the buildings fit in with Shenley Village feel.
- Local amenities are not within easy walking distance: Shenley primary school would be approx. 1 mile away, up Black Lion Hill, a steep uphill walk. Walking to local Shops, doctor’s surgery and the village centre would also involve a steep uphill walk.
- Proposed build density exceeds Shenley's requirement for new housing units in the next 15 years as stated in Aecom report dated January 2018 commissioned by Shenley Neighbourhood Plan Steering Group.

Site: S4	Location: Behind London Road – bordered by Woodhall Spinney
Number of homes: 380 homes (to include flats and family housing) Please note that this is <u>Hertsmere’s</u> proposed number of homes.	Status: Green Belt. Stage 2 Green Belt assessment recommends the southern and eastern part of the site for further consideration.
Possible feedback points	
<u>Sustainability</u>	
<ul style="list-style-type: none"> • Limited bus from London Road to Radlett and Borehamwood means development of this site would go against Local Plan Core Strategy Objective 8 – “to raise levels of access by seeking development in locations not dependent on access by car” • Site does not comply with Government guidelines set out in the National Planning Policy Framework on sustainability—it is not within walking distance of a train station or serviced by a bus that runs every 3-5 minutes. 	

Environmental Impact

- Landscape and visual impact considerable if 380 homes built. It would be another urban development similar to Porters Park.
- The number of additional cars on the roads would increase levels of pollution in the area significantly. This goes against HBC's Local Plan Core Strategy objective of protecting and enhancing the environment in Hertsmere by addressing the impacts of pollution.
- Adjacent to local heritage sites including Shenley Village Conservation Area and an archaeological site
- Woodhall Spinney is a local wildlife site

Road Traffic, Safety and Journey Times

- A minimum of 700 additional cars coming out onto London Road at least twice a day at peak times. That many additional cars plus cars from other possible developments would severely impact journey times and traffic congestion. London Road is a two lane road.
- Homes on this site would be car-dependent as there is little to no public transport alternative. The 658, 602 and 358 bus services are infrequent.
- No bus service every 3-5 minutes to a train station or local services
- Limited access to site via a private Road
- Local highways impact including cumulative effect of additional traffic onto London Road. Building on this site would add to congestion on London Road close to Harris Lane junction and pedestrian crossing.

Infrastructure issues (schools, doctor's surgeries etc)

- Shenley Primary School has no scope for growth on current site so any significant growth in Shenley would require a site for a new primary school. This is not within Hertsmere Borough Council's power to deliver.
- Lack of local secondary school places provision. This is not within Hertsmere Borough Council's power to deliver.
- Gateways Surgery has closed its books to new patients so there will be no healthcare access for people in this development. Adding healthcare facilities is not within Hertsmere Borough Council's power to deliver.
- What plans are there for additional capacity for intensive care units, maternity units, cancer units and other critical healthcare services to support the greatly increased population?

Maintenance of Green Belt:

- Loss of Green Belt land

Misc:

- Need more information from HBC on mix of homes, how they will meet local need and how the style of the buildings will fit in with Shenley Village feel.
- Proposed build density exceeds Shenley's requirement for new housing units in the next 15 years as stated in Aecom report dated January 2018 commissioned by Shenley Neighbourhood Plan Steering Group.

Site: H1	Location: Rabley Green, east of Shenley (between Shenley and B556)
Number of homes: 1500 homes – potential New Garden Village including flats and family housing.	Status: Green Belt. Stage 2 Green Belt Assessment has determined that the middle sub area’s release out of the greenbelt would be unlikely to harm the performance of the wider strategic green belt (which means it could be taken out of the green belt for development).
Notes: Two of the sub-areas comprising 60% of the site are considered to make a strong contribution to preventing encroachment into the countryside. However, the middle sub-area could be released. It is not clear in the document if this means that if only 40% of the site is developed it would equate to 600 homes.	
Possible feedback points	
<p><u>Sustainability</u></p> <ul style="list-style-type: none"> • No nearby public transport service (in fact this is a considerable distance from the nearest public transport) so development of this site would go against Local Plan Core Strategy Objective 8 – “to raise levels of access by seeking development in locations not dependent on access by car” • Site does not comply with Government guidelines set out in the National Planning Policy Framework on sustainability—it is not within walking distance of a train station or serviced by a bus that runs every 3-5 minutes. <p><u>Environmental Impact</u></p> <ul style="list-style-type: none"> • Area contains open fields with long views—maintains unspoilt rural character of area. • The number of additional cars on the roads would increase levels of pollution in the area significantly. This goes against HBC’s Local Plan Core Strategy objective of protecting and enhancing the environment in Hertsmere by addressing the impacts of pollution. <p><u>Road Traffic, Safety and Journey Times</u></p> <ul style="list-style-type: none"> • Homes on this site would be car-dependent as there is no public transport alternative. • If the whole site were developed, access northwards would be onto B556, but access southwards would be via Rectory Lane, Mimms Lane and Packhorse Lane. These are single track lanes that cannot support any significant increase in traffic. • Presently no access to B556, owing to separate ownerships of land across the site. • If the middle section of this site is the only section built on (as recommended by green belt stage 2 assessment) then the only way into and out of the site is via narrow, single track country lanes not built for this level of traffic. • That many additional cars plus cars from this other possible developments would severely impact journey times and traffic congestion in Shenley and surrounding area. • Building here would go against sustainable building principles in NPFF – building within 5 minute walk of a train station. • Nearest railway station, Radlett, is 3 miles away via already congested driving route. • No bus service here. <p><u>Infrastructure issues (schools, doctor’s surgeries etc)</u></p> <ul style="list-style-type: none"> • This site is located a considerable distance from any public transport, schools, doctor’s surgery and local shops so would add to traffic congestion in the area. • Shenley Primary School has not scope for growth on current site so any significant growth in 	

Shenley would require a site for a new primary school. This is not within Hertsmere Borough Council's power to deliver.

- Lack of local secondary school provision.
- Gateways Surgery has closed its books to new patients so there will be no healthcare access for people in this development. Adding healthcare facilities is not within Hertsmere Borough Council's power to deliver.
- What plans are there for additional capacity for intensive care units, maternity units, cancer units and other critical healthcare services to support the greatly increased population?

Maintenance of Green Belt:

- Loss of Green Belt land
- This area prevents sprawl and maintains gaps between nearby towns and villages.
- Developing this site would go against the Local Plan Core Strategy objective of preventing urban sprawl and the coalescence of towns and villages.
- Building on this site would lead to ribbon development along Mimms Lane and as such should not be built on.
- Concern that it would coalesce into site H2, SM2, SM3 and SM1 and create a super-sized New Garden Village effectively joining London Colney to South Mimms to Shenley.

Misc:

- Land is currently in multiple ownerships.
- Need more information from HBC on mix of homes, how they will meet local need and how will the style of the buildings fit in with Shenley Village feel.

Site: H2	Location: Tyttenhanger Estate (North of M25 / B556) – being referred to as “Redwell Village”
Number of homes: 4000+ homes (possibility to increase to 6000 homes due to adjoining small sites and other land available by developer but not currently included in this stage)	Status: Currently agricultural, woodland, open pasture. Green Belt. A large part of the site has been identified in the Stage 2 Greenbelt review as having limited harm to the wider strategic purpose of the Green Belt. The implication is that it can be taken out of Green Belt for ‘intensive’ development
Notes:	
Possible feedback points	
<u>Sustainability</u>	
<ul style="list-style-type: none"> • Development of this site would go against Local Plan Core Strategy Objective 8 – “to raise levels of access by seeking development in locations not dependent on access by car” • This site forms part of the County Council Mineral Extraction assets and is currently having gravel extracted, and there is waste tipping in places. There must be some legislation regarding building of homes on such sites? • Site does not comply with Government guidelines set out in the National Planning Policy Framework on sustainability—it is not within walking distance of a train station or serviced by a 	

bus that runs every 3-5 minutes.

- Dr Harvey Cohen stated in the 13 November meeting of the Elstree Borehamwood Residents Association meeting that a new train station would not be built to service this site demonstrating that there is no plan to ensure that new homes will meet sustainability criteria.

Environmental Impact

- Landscape and visual impact considerable.
- Areas of protected woodland on this site.
- A site of special scientific interest (SSI) is on this site (Redwell Wood)
- Near to Colney Heath nature reserve.
- Archeological sites on this site.
- Various public rights of way run through this site.
- Noise and air quality impact from M25
- Anaerobic digester plant and composting site near to this site.
- Site adjoins two flood risk zones due to proximity to River Colne.
- The number of additional cars on the roads would increase levels of pollution in the area significantly. This goes against HBC's Local Plan Core Strategy objective of protecting and enhancing the environment in Hertsmere by addressing the impacts of pollution.
- Concern about "Strategic Land promoted" red line – this may indicate that the site would become much larger than just the blue area indicated on the map now.

Road Traffic, Safety and Journey Times

- Homes on this site would be car-dependent as there is little to no public transport alternative.
- Limited number of bus routes serve the northern and western boundaries of the site along Coursers Road so there would be a big impact on the local road network.
- Contains EMP7 (employment site) – traffic from Borehamwood would have to go through Shenley creating congestion on a two lane road (London Road) that is already congested with additional traffic from the current spate of building under the existing Local Plan.
- Located a considerable distance from public transport to London (train station). Residents travelling to London would most likely use Borehamwood station as it is Zone 6 making it cheaper than travelling from St Albans/Potters Bar stations. Access to Borehamwood station would be by car with massive impact on London Road and Cowley Hill.
- There is already a lack of parking places at Elstree Borehamwood Station—this situation would be considerably exacerbated.
- Serious impact of additional traffic onto Coursers Road and Junction 22 of M25
- "Proposed link road to B556 for provision of fast route to Potters Bar station" – this is not within HBC's capability of delivering. Only Hertfordshire County Council can deliver this so this should be discounted from "Benefits and Opportunities" assessment of this site.

Infrastructure issues (schools, doctor's surgeries etc)

- Site is a considerable distance from local services and amenities.
- Shenley Primary School has no scope for growth on current site so any significant growth in Shenley would require a site for a new primary school. This is not within Hertsmere Borough Council's power to deliver.
- Gateways Surgery has closed its books to new patients so there will be no healthcare access for people in this development. What plans are there for additional capacity for intensive care units, maternity units, cancer units and other critical healthcare services to support the greatly increased population?

- No education or healthcare capacity plan detailed – with 4,000+ homes on this site, if there is no increase in these infrastructure items then the strain on the existing ones would be intolerable.

Maintenance of Green Belt:

- Developing this site would go against the Local Plan Core Strategy objective of preventing urban sprawl and the coalescence of towns as it would coalesce with London Colney. There would be no significant green space barrier between the two areas.
- Loss of Green Belt land

Misc:

- Concern that it would coalesce into site H1, SM2, SM3 and SM1 and create a super-sized village/town effectively joining London Colney to South Mimms and Shenley.
- Need more information from HBC on mix of homes and how will they meet local need.

Site: BE3	Location: Land off Cowley Hill
Number of homes: 800	Status: Part of this site has been recommended for further consideration, along with adjoining site BE4
Notes:	
Possible feedback points regarding impact on Shenley	
<u>Sustainability</u>	
<ul style="list-style-type: none"> • Limited bus service nearby means development of this site would go against Local Plan Core Strategy Objective 8 – “to raise levels of access by seeking development in locations not dependent on access by car” • Site does not comply with Government guidelines set out in the National Planning Policy Framework on sustainability—it is not within walking distance of a train station or serviced by a bus that runs every 3-5 minutes. 	
<u>Environmental Impact</u>	
<ul style="list-style-type: none"> • The number of additional cars on the roads would increase levels of pollution in the area significantly. This goes against HBC’s Local Plan Core Strategy objective of protecting and enhancing the environment in Hertsmere by addressing the impacts of pollution. • Proximity of this development would have considerable negative impact on community of Well End in terms of traffic, noise and pollution. 	
<u>Road Traffic, Safety and Journey Times</u>	
<ul style="list-style-type: none"> • Additional cars from this and other possible developments in the area would severely impact journey times from Shenley to Elstree/Borehamwood Station. • Residents on this site would potentially look to use Shenley amenities, causing additional traffic pressure. • Access via Potters Lane would add additional congestion to this narrow road. • Additional cars from this and other possible developments in the area heading to Watford/St Albans/M25 would be likely to cause additional traffic through Shenley. • Likely to lead to additional traffic congestion in area. • Building here would go against sustainable building principles in NPFF – building within 5 minute walk of a train station. The site is approx. 2 miles from the nearest station. • No bus service every 3-5 minutes to a train station or local services 	

Infrastructure issues (schools, doctor’s surgeries etc)

- This site is approx. 1.5 miles from the edge of Shenley village, residents on this site would potentially look to use Shenley amenities: local shops, surgery, etc.
- What plans are there for additional capacity for intensive care units, maternity units, cancer units and other critical healthcare services to support the greatly increased population in the area? What about schools capacity/provision?
- Area can barely cope with the repercussions to services and roads from the current state of building under the Local Plan in place at present.

Maintenance of Green Belt:

- This area forms an essential gap between Borehamwood and Well End.
- Developing this site would go against the Local Plan Core Strategy objective of preventing urban sprawl and the coalescence of towns.
- Loss of Green Belt land.

Site: BE4	Location: Land off Well End Road (opposite Studio Way estate)
Number of homes: 600 homes, plus sports and employment uses.	Status: Part of this site has been recommended for further consideration, along with adjoining site BE3
Notes:	
Possible feedback points concerning impact on Shenley	
<p><u>Sustainability</u></p> <ul style="list-style-type: none">• No bus service available for this site. Development of the site would go against Local Plan Core Strategy Objective 8 – “to raise levels of access by seeking development in locations not dependent on access by car”• Site does not comply with Government guidelines set out in the National Planning Policy Framework on sustainability—it is not within walking distance of a train station or serviced by a bus that runs every 3-5 minutes.	
<p><u>Environmental Impact</u></p> <ul style="list-style-type: none">• A number of water courses run across the site, with some flood risk.• Landscape and visual impact would be considerable as the area as largely comprises open fields with long views and unspoilt rural character.• The number of additional cars on the roads would increase levels of pollution in the area significantly. This goes against HBC’s Local Plan Core Strategy objective of protecting and enhancing the environment in Hertsmere by addressing the impacts of pollution.	
<p><u>Road Traffic, Safety and Journey Times</u></p> <ul style="list-style-type: none">• Site is quite a distance from centre of Borehamwood.• This site is approx. 1.5 miles from the edge of Shenley village, residents on this site would potentially look to use Shenley amenities causing additional traffic pressure.• Homes on this site would be car-dependent as there is little to no public transport alternative.• No bus service to this site.• Additional cars from this and other possible developments in the area heading to Watford/St Albans/M25 J22 would be likely to cause additional traffic through Shenley.	

- Possible 1200 additional cars on the road from this site. That many additional cars from this and other possible developments would severely impact journey times and traffic congestion in Borehamwood and possibly Shenley.
- Building here would go against sustainable building principles in NPPF – building within 5 minute walk of a train station. The site is approx. 2 miles from the nearest station.

Infrastructure issues (schools, doctor’s surgeries etc)

- This site is approx. 1.5 miles from the edge of Shenley village, residents on this site would potentially look to use Shenley amenities: local shops, surgery, etc.
- Lack of capacity at local primary and secondary schools.
- Lack of capacity at local doctors surgeries.
- What plans are there for additional capacity for intensive care units, maternity units, cancer units and other critical healthcare services to support the greatly increased population?
- Area can barely cope with the repercussions to services and roads from the current state of building under the Local Plan in place at present.

Maintenance of Green Belt:

- Developing this site would go against the Local Plan Core Strategy objective of preventing urban sprawl and the coalescence of towns
- Loss of Green Belt land

Misc:

- Need more information from HBC on mix and style of homes, how they will meet local need and their visual impact.

SMALLER SITES PUT FORWARD FOR DEVELOPMENT IN SHENLEY

Site: HEL 354 – 75 homes	Location: Land north of Fox Hollows, Rectory Lane (nr Pinks Farm)
<ul style="list-style-type: none"> • Access is via narrow country lanes not built for this level of traffic. • No public transport or local amenities – or anywhere to provide them. • Building here would go against sustainable building principles • Nearest railway station, Radlett, is 3 miles away via already congested driving route. • Lack of parking spaces for Radlett station already a problem for commuters 	
Site: HEL 196 – 45 homes	Location: Land beside Wilton End Cottage, Radlett Lane
<ul style="list-style-type: none"> • Close to HEL360, also Radlett Lane, with potentially 230 homes. • Building here would go against sustainable building principles • Additional burden on local infrastructure and roadways. • Visual impact on approach to Shenley. • Nearest railway station, Radlett, via already congested driving route. • Lack of parking spaces for Radlett station already a problem for commuters 	
Site: HEL 360 230 homes	Location: Land South of Radlett Lane
<ul style="list-style-type: none"> • Close to HEL196, also Radlett Lane, with potentially 45 homes. • Building here would go against sustainable building principles. • Additional burden on local infrastructure and roadways. • Visual impact on approach to Shenley. • Nearest railway station, Radlett, via already congested driving route. • Lack of parking spaces for Radlett station already a problem for commuters 	

Site: HEL 390 – 50 homes	Location: Land adjacent to 52 Harris Lane
<ul style="list-style-type: none"> • The site substantially fulfils the green belt criteria according to NPPF criteria. It prevents further 'sprawl' of Shenley towards M25. • The proposed level of density of homes is inappropriate. There are only 20 homes on a similar size site the next road over -- Anderson Road. • If Rabley Village goes ahead then every millimetre of green belt in RC3 will be essential to stop the south-west 'sprawl' joining up with north-east development. • Heavy parking along Harris Lane means that it often functions as a single-track road. Further development would bring increased congestion to the road and increased risk to children, mothers, dog walkers etc who use the playing fields. • If Site 4 is built and this site is built, then Harris Lane would experience significant increase in traffic volume and that will not work as the road often ends up as a single lane road due to people parking on the road—especially during school run times for Shenley Primary. • 50 more houses would mean a big increase in car traffic outside the playing fields and more congestion on other single track roads such as Mimms Lane and Rectory Lane. • Visual impact of a high density development on small residential lane with rural character would be considerable and would impact inward and outward views. • Building here would go against sustainable building principles as detailed for other sites. 	

Other potential development sites to comment on that will affect Shenley due to increased volume of traffic on roads leading to increased travel times in the area:

In Borehamwood section of report:

- HEL152 – Lyndhurst Farm, Green Street – 100 homes
- HEL218 – Organ Hall Farm, Theobald Street – 130 homes
- HEL369 – Well End Lodge, Well End Road – 15 homes
- HEL371 – Old Haberdashers Sports Ground, Croxdale Road – 140 homes
- HEL388 – The Point, Borehamwood – 55 homes
- HEL405 – Brook Road Car Park – parking retained. Development would be above. No number of homes provided in document.
- HEL406 – Clarendon Road Car Park - parking retained. Development would be above. No number of homes provided in document.

In Radlett section of report:

- HEL214 – Land South of Theobald Street – 90 homes
- HEL358 – Land South of Shenley Road – 230 homes – only access is Shenley Road. Development of this site would greatly affect Shenley.
- HEL 367 – Land West of Watling Street – 230 homes – above Little Kendals / adjoined by HEL198 (25 homes)

Ideas suitable for the General Comments Section which can be found at the end of the Local Plan Consultation document on the Hertsmere Portal.

Comments on HBC's Process of consultation for the Local Plan

- This report has no plans for improved infrastructure. How can residents give meaningful feedback on plans without full knowledge of the proposed infrastructure improvements that would accompany them? None of the proposed sites are viable without additional infrastructure and many would require substantial building works such as a diversionary road to be built in order not to result in yet more traffic jams and congestion. Without sight of these plans this is not a meaningful, informed, consultation.
- When will there be a second stage consultation? The information available at the moment is woefully inadequate. There appears to be no substantive commentary about the likely impact on wildlife, water table, air quality, traffic or noise pollution. Please can we have assurances that these studies will be done and residents be properly consulted before any decisions are taken?
- Will HBC commit to do full traffic surveys of Hertsmere to understand the impact of the increase in cars on local roads and the M25 and A1 for all the sites chosen to be developed and to release this information as part of a second stage consultation?
- Under the Gunning Principles for Consultation, Hertsmere are obliged to demonstrate that they have taken the feedback received into serious consideration – at all stages. How and when does HBC plan to do this?
- The Local Plan consultation document is not user-friendly or easy for the average person who is not schooled in planning matters to understand. The supporting studies are difficult to find on the website and it is not clear which of them are most relevant. Summaries of these reports have not been made available. The main green belt report is 130 pages and the annex is 400 pages. Hertsmere are not making easy for the population at large to understand what is in these reports.
- Hertsmere has offered a relatively short consultation window (in the run up to the Christmas period) with only one 'Exhibition' in Shenley which fell part way through the consultation period. As a result they have received less than 1% feedback which is not a measure of the strength of local feeling but could be an indication of the inadequacy of the consultation process. There is a danger that if Hertsmere do not do improve their consultation process that they will fall foul of the Gunning Principles.

Comments on the lack of joined up thinking and and co-ordination between the bodies who will need to co-operate to deliver the infrastructure:

- Hertsmere Borough Council are not in charge of provision of new roads, schools or surgeries. What reassurance can they offer that their plans to develop land will be accompanied by proper infrastructure development when this lies within the purview of the County Council?
- Hertsmere and the other South West Herts districts must plan for additional critical health care services, (not just GP surgeries or drop in centres) such as intensive care units,

maternity units, cancer units. Such units have actually been closed down from QE11, St Albans, and Hemel hospitals, (and Watford General alone can't cope). Cancer treatments for many people are at Mount Vernon. How can Hertsmere confirm that critical care will be available for those in need when considering a greatly expanded local population?

- HBC should be speaking with Oliver Dowden, our MP, to have him represent to the Government that the current system of town planning does not work. Local boroughs are charged with building houses but the County Council is in charge of the infrastructure and the Clinical Commission are in charge of providing health services. This is not a joined up process. On several occasions Dr Cohen has said that they cannot get meetings with the Clinical Commission to address this and yet the government is insisting that local Councils plan to build more houses.
- Borehamwood and St Albans railway station frequently can't cope with the increased passenger numbers resulting from development in recent years. Hertsmere and St Albans need to clearly plan for increased capacity not just in the rail services but in safe infrastructure at stations to cater for increased demand. We would like to have sight of these plans before any sites are approved for development.
- None of the sites proposed are 'sustainable' according to NPPF legislation or HBC's own documentation. Where are the documents detailing that developer will have to provide for car free (or at least fossil fuel free) living, cycling lanes, bus lanes, charging points at every home for electric cars etc?
- Why are we considering building 'employment sites' where there is plenty of unoccupied warehouse and office space in the local area?
- Will there be real employment opportunities created, not just warehousing, but jobs in media, aerospace, technology etc? What steps are Hertsmere taking to attract quality employment opportunities to the area to alleviate dependency on commuting in/out of London.

Comments on failure to take into account existing reports and information available when proposing sites for development leading to possible over development in the borough as well as unnecessarily putting the green belt at risk:

- Hertsmere is 80% green belt which means that under the NPPF green belt boundaries do not have to be reviewed to ensure Local Authorities can meet their objectively assessed need. Local Authorities which are heavily constrained by green belt use this as a reason not to plan for their full objectively assessed need. The presumption in favour of sustainable development NPPF 11 (b) indicates that the objectively assessed needs, do not need to be met by strategic policy, where protection policy in Footnote 6 (incl green belt) of the NPPF provide a strong reason for restricting the overall scale, type or distribution of development in the plan area, or any adverse impacts of meeting needs, in full would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF as a whole. SO Why are HBC not talking to Central Government to make sure Hertsmere's numbers reflect this policy.
- The proposed development plans make no reference to the type of housing that will be provided. Shenley has had a housing needs survey by AECOM which indicates that young

families and the elderly are the two groups most in need of provision. HBC should be prioritising plans for these groups and needs to make a commitment to ensure that *suitable* as well as sustainable development is the outcome of this process. What mechanisms are in place to ensure that developers don't fill the land with "luxury flats" and "£1m+ McMansions"?

- The Government has not finalised the number of new homes needed for the 15 year period. They are revising their figures downwards. Why is Hertsmere revising their numbers upwards? (in 2017, the first figure HBC provided was 9000 homes now it is 10,800).
- To what extent have Hertsmere taken into account building projects that are already underway in their targets?
- Will HBC have a plan to be flexible and release sites in a staged process so we don't overbuild in case new government figures come out that are even lower in the next three years?
- Dr Cohen said at the Elstree Borehamwood Residents Association meeting on 13 November that "35% of new housing will be affordable – guaranteed". "Affordable housing" is defined as 80% of market value. With most prices for a three bedroom home in Shenley topping £500,000; "affordable" would mean a price of £400,000 which would require a household income of £100,000+. The average household income in the SouthEast is £28,288. How is Hertsmere Borough Council planning to guarantee that 35% of new housing will be affordable for the average household income?
- AECOM (the Government's own housing assessment partner) completed a Housing Needs report for Shenley which states that only 220 homes are needed for the next 15 years yet each of the 'strategic' sites listed in the Shenley section of the report are for 250+ homes. Why is HBC disregarding the advice given in Shenley's Government funded Aecom report? Hertsmere use Aecom themselves.
- Paragraph 1.7 of the Local Plan document states that HBC will give priority to developing land within existing built up areas (expecting to achieve 45% of development this way) and also expect to meet part of their housing target through 'windfalls'. Therefore less than half of any target will need to be met by developing green belt areas. Can Hertsmere Borough Council confirm that this is the approach they intend to use?
- Can Hertsmere Borough Council confirm that they are not planning to build in excess of whatever the government requirements turn out to be and will adopt a phased release of land, prioritising brownfield sites, until such time as real housing needs are known. Immigration levels have fallen since the record levels of 2015 and 2016 and it is unclear what direction they will take in the future with Brexit looming.
- It is my understanding that Hertsmere Borough Council will receive a 'bonus' equivalent to the Band D council tax rate of each new house it builds for the first five years after it has been built. I am concerned that this may motivate them to build over the numbers required by the Government. Can the Council confirm that they will only build the numbers required by the Government and adjust accordingly when the Government lowers the figure.

- Hertsmere has previously had a good record and therefore good reputation for protecting the borough's Green belt. Why do they seem to have changed policy and are now wanting to take so much land out of our green belt when revised Govt housing needs figures indicate that fewer homes are needed now. What is the reason for the change of policy?
 - As reported in the Borehamwood Times recently, the Ministry of Defence (MOD) also owns many properties around the UK that are left empty. Why is the Council not putting pressure on Hertsmere Borough property owners to rent out or sell any homes that fall into the above category such as the MOD properties in Bushey?
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You may wish to write to the Leader of Hertsmere Council, Morris Bright or to The Planning and Localism Portfolio Holder, Harvey Cohen and our MP, Oliver Dowden with some of the questions from above.

- Morris Bright - cllr.morris.bright@hertsmere.gov.uk or leader@hertsmere.gov.uk or Hertsmere Borough Council, 3 Elstree Way, Borehamwood WD6 1WN
- Dr. Harvey Cohen - Planning and Localism Portfolio Holder - cllr.harvey.cohen@hertsmere.gov.uk or Hertsmere Borough Council, 3 Elstree Way, Borehamwood WD6 1WN
- oliver@oliverdowden.com; Mr Oliver Dowden CBE MP, House of Commons, Westminster, London, SW1A 0AA