



**SHENLEY PARISH COUNCIL
SHENLEY NEIGHBOURHOOD PLAN STEERING GROUP
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**BY EMAIL WITH HARDCOPY
DELIVERED BY HAND**

20th December 2018

Dear Vincent, Mark & Ann,

HERTSMERE'S NEW LOCAL PLAN: POTENTIAL SITES FOR HOUSING AND EMPLOYMENT CONSULTATION

On behalf of Shenley Parish Council and Shenley Neighbourhood Plan Steering Group we are writing to give you our response to your Potential Sites for Housing and Employment Consultation. We also have comments to make about the way new Local Plan consultations are being conducted and this one in particular.

Hertsmere - Number of New Homes Required over next Fifteen Years and Shenley's Expected contribution

As we stated in our letter of 17th October 2017 - While we are happy as a Parish Council and Neighbourhood Planning group to deal with the housing needs of our existing community we do not accept that we need to have the high numbers you are proposing for Shenley. Via Locality the Neighbourhood Plan Steering Group commissioned AECOM to carry out Site Allocations and Housing Needs assessments. AECOM is an organisation

you have used for some of your major reports. The March 2018 AECOM Shenley Housing Needs Assessment tells us that we require no more than 220 homes over the next 15 years and this is an unconstrained figure, which was done before the Government announcement on 24th July 2018 that they had got the numbers wrong and all housing targets would be reduced significantly downwards. As this report confirms, if Shenley at 220 project housing needs is 4% it shows that the Borough need is 6000 over the life of the new local plan, which is consistent with the requirements in the past.

At our meeting on 10th October we requested that you give us an indicative housing figure for Shenley. You said that you could not and to date we have not been provided with a figure. We must tactfully remind you that despite all you have said to the contrary at the meeting on 10th October and 7th December you are obliged to give us this information according to the old and new NPPF. Again we ask for an indicative figure.

Hertsmere is 80% Green Belt which means that under the NPPF green boundaries do not have to be reviewed to ensure Local Authorities can meet their objectively assessed need. Local Authorities that 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 provides 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.* Why therefore are you not talking to Central Government to make sure that Hertsmere's numbers reflect this policy? You owe it to all Hertsmere residents to question the numbers and fight for lower numbers.

Hertsmere has previously had a good record and therefore a good reputation for protecting the borough's Green Belt. Why have you apparently changed policy and now seem to be wanting to take so much land out of our green belt when revised Government housing needs figures are likely to indicate that fewer homes are now needed. What is the reason for the change of policy? At the meeting on 7th December it was said that we may have to take some of Watford's numbers but as we are struggling ourselves to meet our own numbers why are you considering this. As the new Head of Planning is coming from Watford Planning we are concerned that he will favour this approach such that the 10,800 figure mentioned at the meeting on 10th October will increase even more. Indeed this was alluded to.

The Welwyn & Hatfield Times 14 Dec '18 is saying that Welwyn Hatfield Council are *'reaching out to Hertsmere for help in relation to their 4,000 home shortfall.* The comment being that Hertsmere may end up with enough potential sites to fulfil its mandated house building programme and possibly more besides. *"Welwyn Hatfield would like to formally repeat the request it made...that Hertsmere give consideration to whether it is in a position to meet some or all of Welwyn Hatfield's unmet housing needs".* We feel that as you are showing all sites put forward, equivalent to 22,000 new homes all of which would be in the Green Belt, clearly most of these potential sites would be unsuitable because they are not sustainable and their protected status, and it is misleading to both potential developers

and our neighbouring Local Authorities as it is leading them to believe we are intending to release virtually our entire Green Belt for redevelopment.

We must tell you that there is concern that the talked about 'bonus equivalent to the Band D council tax rate for each new house built for the first five years after it has been built is the main motivation to build higher numbers than the Government requires? Are you using this as a means to replace Central Government funding which has been reduced considerably since the economic crisis? Please will you confirm if this is the reason or not. Can you also assure us that you will only build the numbers required with the needed infrastructure provided upfront when the final figures for this plan period become known?

We do not believe that you have a mandate to make decisions that drastically affect our Green Belt when such a high proportion of the community want it protected. In every survey we have carried out as part of the Shenley Neighbourhood Plan process we have had 98% response supporting the protection of our green belt. In our last major survey, the Housing & Development Survey completed in October last year we had 557 responses (we asked for one response per household and had a *37.8% response*. It was apparent again that protecting our green belt is supremely important to our community and we are sure this is true of the majority of Hertsmere residents. Indeed more and more residents from the wider borough are coming to Shenley to access open countryside. This in itself is a good use of land in terms of health and wellbeing.

The Government has in recent years put increasing emphasis on the importance of local views when formulating planning policy. When the Localism Act of 2011 increased the powers of Parish and Town Councils within the Planning function; The stated aim of the act was to facilitate the devolution of decision-making powers from central government and the Local Planning Authority to 'individuals and communities'. Since then (in 2012) the Department for Communities and Local Government (DCLG) has taken action to give communities further rights – '*to take the initiative when it comes to how local public services are run and planning decisions are made*'.

Unfortunately it does not seem that you are allowing Shenley to have a meaningful say in fundamental planning decisions that will have a major detrimental impact on our community despite the fact that the Shenley Plan is soon to move on to its Regulation 16 consultation. As part of the Shenley Plan process we have had over 50 meetings (Steering Group and Working Party meetings) 6 major public meetings and well attended stands at the 2017 and 2018 Shenley Fetes. Our three major surveys were well supported and we have approaching 2000 comments. *A huge amount of feedback*. As a result we have been able to compile a Shenley Plan that reflects what the majority of Shenley community wants and what we need as a key and distinctly rural village in the borough.

It is extremely alarming when you state in the Issues & Options Consultation report and the FAQ for the 'Potential Sites Consultation' that the Borough Executive will decide where development will be. As you are aware neither of the two Shenley Borough Councillors are members of the Executive. Of the eight members of the current Executive, six members represent Elstree & Borehamwood and Bushey. Both areas that have had to shoulder the burden of new housing in the recent past and areas where the Ward Councillors have expressed in public the view they should have no further development,

new development should be shifted to Shenley Parish. We agree that these areas have been over developed in recent years, but they are also areas that have main line stations and better bus services which made them more suitable areas for good planning reasons.

In the past 30 years there has been so much overdevelopment across the whole borough, we feel that you should be using your option to go back to Central Government to show just how much development has already taken place and the strains that puts on the existing local infrastructure which is bursting at the seams and there seems no prospect of further improvements relating to this increased demand. There is no part of the Borough that has not already had significant changes, and therefore we are approaching the point where there is no space for building thousands of new homes.

Here in Shenley we have had the redevelopment of Shenley Hospital creating around 1100 new homes and changing our population from around 1000 20 years ago to over 4600 today. We have also had the building of the M25 through which huge amounts of agricultural land was lost. Not only has this deprived the Parish of land that may have been suitable for redevelopment it has created a specific problem for the village in that Junction 22 at one end of the village and the Borehamwood Junction to the A1 at the other end of the village allows traffic to bypass the notorious South Mimms/M25/A1 interchange and has caused the large volume of daily traffic movements through Shenley – 10,000 + a day (almost the same level of traffic going through Shenley Road Borehamwood). On top of that when there is an issue on the M25 traffic comes off and clogs up all the surrounding roads creating gridlock with increased traffic on single track lanes. When designing new places the NPPF 2018 says that should not be at the detriment of the existing population.

There will always be new building as buildings age and sites become redundant. Unless you wish to see the Borough become part of Greater London and build right up to the M25 you have to look at more modest levels of building or consider as we have seen in Borehamwood adding layers to existing flats or converting larger properties into apartments. We accept that we need some new development in Shenley because we lack the type of properties identified in the AECOM Shenley Housing Needs Assessment 2018, then as confirmed by our own residents in the Housing & Development Survey October 2017. We are being proactive rather than reactive in dealing with our own need.

The Government 2017 White Paper 'Fixing the broken Housing market' is the paper that is asking for new housing to replace the council houses that were lost and those at the lower to middle of the private market. Your own sustainability appraisal of the emerging Hertsmere Local Plan, September 2017, confirms that 72% of the yearly Hertsmere house build needs to be for this market. We are concerned from the amount of land being put forward across the whole Borough that potential developers maybe trying to use the current undersupply for this market to push for large amounts of building in the Green Belt.

We are also aware from our discussions with developers who are interested in the large number of sites being put forward in our Parish that they will not be building this for you as they are talking about putting the lowest housing prices in the region of £600,000 upwards. This is reflected by Rest Harrow development in London Road where 3 bedroomed semi-detached homes are being marketed off plan for £1.5 million. In your SEA, it is pointed out that the average salary in Hertsmere is £30,000 and the average house price is £500,000 so currently none of the new builds are available to the market which the

Government is trying to help except for the few that are being handed over to Registered Social Landlords (RSL'S). The real challenge for Hertsmere is to deliver housing for this market as it has been proved to be what the Borough really needs. It does not seem to us to be sensible to be encouraging massive new building if it is not meeting the real housing needs.

This Conservative Government has expressed the view that it does not see large amounts of development in the South East of England as it recognises it has already been overdeveloped. Hertsmere is a Conservative authority with a large majority, we assume that you will follow this sentiment and only allow the needed development for the specific shortfall and not encourage over development of the wrong type of housing.

1. Comments about your new Local Plan Consultations and this one in particular

1.1 Firstly we are not sure if this Consultation is part of the statutory consultation for the Making of a new Local Plan?

We hope we all agree that it cannot be a matter of who and how many shout the loudest in this important matter for the future of our borough and Parish. This consultation has created unnecessary anxiety, confusion and much grief in our community and across the borough. This is indicated by the many campaign groups that have been set up in Shenley and other areas. Last year your new portal made it very difficult for people to give their feedback so we facilitated many residents getting hard copies to use. This year it is even more difficult for residents to respond via the portal and even our own Neighbourhood Plan Steering Group are having difficulty making comments. All we can give our residents is one sheet to make all their comments on which we do not think is good enough, so we have suggested that residents write or email comments to you directly.

We also think that your timing is not good. Fixing the deadline for 20th December has caused us major problems due to Christmas pressures, multiple Parish commitments and of course personal commitments. We trust you understand the importance of timing of good consultation. Many residents are finding it extremely difficult finding time to do give their feedback. We suggest that you consider extending the consultation period until the middle to end of January to allow for Christmas.

1.2 All Shenley Parish sites should have been referenced S1, 2, 3 and so on. We do not agree with the HBC approach showing so many potential sites located in the Parish of Shenley as part of Borehamwood (BE2 BE3, BE4) and other Sites (H1, H2). Not only is it inaccurate it also makes it unnecessarily difficult for our residents to find the sections online to submit their comments and also to find and review evidence base relating to each site. Doing it this way we fail to see how you can facilitate if not a consensus but at least understanding regarding the rational as to why decisions are taken. It can be interpreted as being misleading Technical solutions were not sought for this practical issue and therefore it may render this consultation obsolete because of its inaccessibility and lack of detail in the evidence base (Draft Sustainability Statement page 21). We also object to the mentioned 1000 additional homes for Key Villages (Issues and Options) only being counted.

1.3 We do not feel that the Issues and Options consultation in 2017 had the appropriate scope nor detail. In our view it has not led to a clear vision, spatial strategy and policy priorities for growth in the Borough and Parish. In this current consultation we do not see how your duty to cooperate with other boroughs has informed your approach. For a meaningful consultation we would expect you to tell us about the plans St. Albans has for the sites bordering our Parish and indeed the opportunities to build a new town with rail access around Napsbury rail station. It would be more sensible to discuss with St Albans putting any of our unmet need on the same site because there will be a railway station and more development on the same site would be able to deliver better infrastructure rather than considering a stand alone site only a mile or two up the road with no transport links.

1.4 We also feel that not providing/assessing land with capacity of less than 250 and the lack of information on employment land within the larger planned communities are inadequate at this stage of your Local Plan making process.

Furthermore we are not sure if this Potential Site Consultation is actually a statutory consultation under the relevant Regulations or indeed how the council will use the many representations in a meaningful way to move the Local Plan forward and therefore make decisions about releasing land from the Green Belt. We read in the Watford Observer for instance that "We won't need to allocate all the sites for development that have been put forward, so we are asking for your help in deciding which are the most appropriate locations." (<https://www.watfordobserver.co.uk/news/17194331.have-your-say-on-local-plan-in-hertsmere/>)

1.5 As a Parish Council, we principally and strongly object to the sheer number of sites, the proposed scale of development as well as lack of detail, spatial priority, vision and leadership demonstrated in this consultation approach and its documents. There is a need for more homes and local jobs, but we simply do not need that many sites and this scale of development as stated in numerous places in the Councils information and press releases is in our view wholly inappropriate. Less than half of the potential land put forward is needed to accommodate the talked about 8000 to 10000 homes, jobs and supporting infrastructure. Land efficiency and building a step change in public transport provision will require to build to densities more akin to proper market town. We believe that the strategic South West Herts Planning Group needs a new town of the size of Bushey, built to 21st century quality standards and including a rail-based access to London and St Albans and beyond. Importantly, the vision and policy vacuum this 'Potential Sites' consultation is placed in, is considered to be very unhelpful indeed. It is not clear what principles and policies will be guiding the future development of the borough. Given the amount of uncertainty relating to developers proposals. The provision of a draft New Plan Policy document with a vision for the Borough and its different areas would go a long way to reassuring us as to how the local authority sees the future of the borough and our Parish as living places and not just housing number recipients. The South West Herts partnership needs to find a suitable site for a village on one of the main railway lines. The proposal to suggest such a development on a site that currently has no rail or bus links makes no sense.

1.6 The NPPF makes it clear that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified. In coming to the conclusion that an extension to the boundary is justified, the planning authority must be able to demonstrate that it has fully examined all other reasonable options for meeting its identified need for development. Extension of the boundaries is only likely to be acceptable if the strategy already:

- Makes as much use as possible of suitable brownfield sites and underutilised land;
- Optimises the density of development in line with the policies on making effective use of land, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and
- Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.
- If it is decided that Green Belt land should be released for development, the planning authority should first consider using that land which has previously been built upon and/or is well served by public transport.

1.7 The sheer number of sites, assessment reports, and undefined cumulative impacts combined with very thin information as to what is actually proposed for the over 70+ sites makes it very challenging if not impossible to give intelligently considered feedback. The intelligent consideration and response to your consultation is therefore in our view hindered to an unacceptable level.

1.8 In view of all the above, we kindly request the Council to demonstrate in their response to our representation as to how it feels that all the Gunning Principles for fair consultation have been met in this statutory consultation and how they are satisfied to an acceptable level. We do not believe that they are.

2. Alternative Development Scenario for Growth in a borough made up of 80% Green Belt

2.1 Para 137 in the NPPF states: ‘Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of its strategic policies, which will take into account the preceding paragraph, and whether the strategy:

- a) Makes as much use as possible of suitable brownfield sites and underutilised land;
- b) optimises the density of development in line with the policies in chapter 11 of this Framework, including whether policies promote a significant uplift in minimum density standards in town and city centres and other locations well served by public transport; and
- c) Has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground.

2.2 We would like to encourage HBC to test a development scenario which is closer to the NPPF 2018 and combines the following 5 planning policy strategies to achieve well-designed places. This development scenario:

- a) develops brownfield first and in **higher densities** in walking distance around train stations and high streets (para 138 NPPF 2018) fixing some of our dysfunctional settlement aspects in our urban settlements including traffic and providing much needed homes for the elderly and young families with less access to a car near services;
- b) **Prioritises the many smaller sites** (the 30+) part of or adjacent to existing settlement areas with access to a range of (physical) infrastructure networks (para 138 NPPF 2018). This will help in diffusing impacts and having positive impacts on economic, social, environmental and viability impact due to their proximity to locale services. Smaller local companies that also more likely to design, build and sell them more independently;
- c) supports Parishes and Town Councils in **producing Neighbourhood Development Orders** for sites to remain permanently in the Green Belt and via a public vote (para 144.f);
- d) explores **Special Policy Areas and Village Envelope Extensions** to help to deliver new development with a significant proportion of genuine affordable homes in the Green Belt and stripped down good rural design standards.

3. Lack of information in terms of Infrastructure Delivery Planning

3.1 Our Parish covers about 25% of the land in the borough, over 95% of the Parish is located in the Green Belt, but it is only home to 4% of the population of the borough. This makes us in many ways an easy target for growth. This particularly in the run up to local elections where popularity is a key consideration. The Parish does not have a train station, only a very poor bus service, very little education and health infrastructure and only a few local jobs. The network of water mains, electricity, waste, gas, telephone and internet connections is very thin and in large parts of our Parish not in existence. The majority of the land you have identified for redevelopment is currently used for food production. As we are due to leave the EU in March, and the future is uncertain it would be sensible to keep this land in food production until the situation is clearer.

3.2 The rural character of the Parish has already been altered through the building of the M25 and Porters Park. The noise and air quality issues generated by the significantly increased traffic are not to be under estimated on either site of the M25 and London Road. A pregnant resident told us recently that she was told to stop smoking due the high levels of carbon monoxide in her blood. She does not smoke and lives on a farm and there is a concern that her condition is due to the fact that she lives within a mile of the M25.

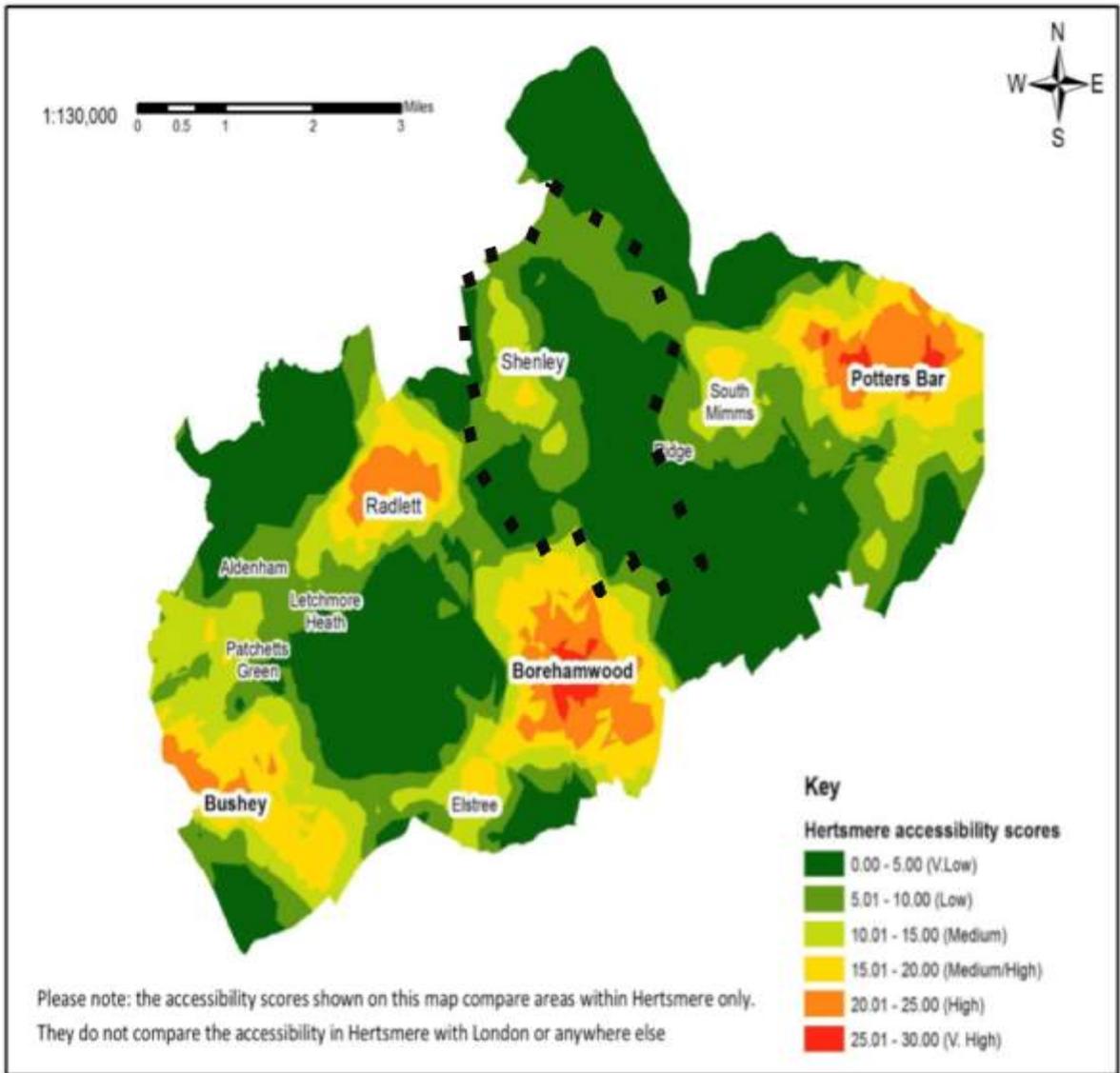


Figure 2: Accessibility map of Hertsmere

The New NPPF and ‘A Green Future: Our 25 Year Plan to Improve the Environment’ as well as emerging neighbourhood plans in the borough emphasize the importance of Green Belt and open space protection, biodiversity/habitats enhancement, the need for development underpinned by sufficient infrastructure provision and indeed high design quality when considering the growth of settlements.

3.4 We are concerned how the large sites will comply with the governments ‘A Green Future: Our 25 Year Plan to Improve the Environment’ and its emerging ‘Net Biodiversity Gain’ policies. This is relevant for all.

3.5 Your consultation document shows 27 'strategic sites' (250+ homes), over 40 smaller (<250 homes) and out of town 7 Employment Sites (EMP 07 omitted). We do not understand how so many sites can meaningfully be considered. Can you please explain how you arrived at defining the sites above 250 as 'strategic' and not using for instances Schedule 2 Development thresholds for Environmental Impact Assessments (150+ homes).

We object that your approach does not consider the sites below the - in our view unexplained 250 homes threshold - in this consultation in any sufficient way. In our case for the Parish of Shenley we also object to those sites where those could amount according to your publication to 400+ homes (no employment indicated). This particularly where site constraints on the 'strategic sites' have not been considered to a sufficient amount of detail, leading to unrealistic identified site capacities in our view, overly positive job and infrastructure provision expectations and the ability to deliver an undefined proportion of affordable housing (at 80% of market price). The latter will price out a very large number of people and it is not clear where all those thousands of people will come from who can afford 80% of current market prices in Shenley or the region. Many of the new homes need to be much cheaper than that. This if they are to help address local supply shortages (old Core Strategy Policy). Mortgage lenders do not provide more than 4 or 5 times the annual salary and we do not expect that to change in the next decade.

3.6 Shenley Parish, is home to a third of your potential 'strategic' sites (9) plus 5 smaller sites (each below <250). It has an emerging Shenley Neighbourhood Plan that wishes to develop land via Neighbourhood Development Order/s. We are acutely aware of your lack of communicated vision for these sites but there is a general commitment on our side to design great new places to live and work in our rural environment that our research indicates would gain the support of local people. A clear strategy and commitment to good place-making by building in the best accessible places to densities that reduce the loss of Green Belt is extremely important to our community. Our strategy involves the development of an NDO so the village and development land is kept in the Green Belt. We also would like you to consider forming a Special Policy Area.

Your strategy seems to be to looking at very large sites only as a means to find the required monies to fund the needed infrastructure. We do not think this is sound approach "in examining fully all other reasonable options' (para 137 NPPF) nor do the proposed densities seem deliverable. Assumptions made regarding the number of homes and ability to finance those listed and huge infrastructure requirements seem overly optimistic and by no means convincingly evidenced. Your Infrastructure Delivery Plan Baseline 2018 is a start but we believe it to be wholly inadequate to be considered as part of forming a justified view on the suitability of sites. The smaller Site 4, as indicated in your consultation will require less physical infrastructure investment than other sites to connect to existing road and public transport infrastructure as well as water, waste and electricity networks. As a consequence there will be more money available for Shenley to have a much needed purpose built community centre and more genuine affordable homes as part of the mix of homes needed in the Parish.

4. Green Belt Boundary and Porters Park

4.1 As a Parish, we are determined to not allow another Porters Park to happen in front of our eyes. There, all the promised infrastructure and services were never provided because of viability but also because of the inability of enforcing existing policies and good practice. Over the years more homes were 'fitted in' without a proper layout that works well for pedestrians and children nor for bus services or cars generally. Also promised community facilities were simply not delivered.

4.2 Porters Park was a brownfield development with much of the physical infrastructures in place or easy to connect to which helped in reducing development costs. Most of the very large potential sites have no physical infrastructure in place and development costs will no doubt lead to negotiations with the developers on the affordable housing proportion (at 80% of the market price) and community infrastructure provision. This after much of the money is spend for traffic engineering and other physical infrastructures. However, the Government and the courts attach great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

4.3 We would like to bring to your urgent attention that taking Porters Park out of the Green Belt in 2016 has put obligations onto you with regards to maintaining the 'permanence' of Green Belt boundary beyond the plan period. Further in the Public Enquiry in 1986 and subsequent legal agreements with regard to the permanence of the boundary of Porters Park between the NHS, Shenley Park and HBC should be honoured.

'Securing a good future for Shenley, HBC's Planning Brief which was approved and adopted on 22nd October 1986. Stated ***'The first priority is to strengthen the Green Belt.*** It goes on to say *'The key to an effective Green Belt is the definition of a defensible inner boundary around the site and this will be achieved by.....: ***'Reinforcing a green edge all round the site so that the redevelopment does not impinge on the view from the surrounding roads and cannot sprawl beyond pre-set boundaries.*** (Introduction Point 7 Page ii). The Proposals 7d. says *'Public Open Space – 45 metres of rural Parkland "Shenley Park", to be provided together with a 'green border' 5 metres wide around the site.'* On Page 6, Defensible Green Belt boundary point 2.6 says ***'To achieve a permanent Green Belt boundary round the site, a green border, or 'cordon sanitaire' should be created, encircling all the developed area.*** This should be planted with a mixture of oak, ash, dogwood, hawthorn, etc.; to create a thicket and it should include the provision of a circular pathway round the site. ***The aim should be to retain the feeling of being in the countryside while going along Black Lion Hill.****

In a letter to the editor of the Borehamwood & Radlett Advertiser dated 17th July 1990 Robin Smith, Hertsmere Borough Council Planning Officer says *' In relation to the 30ft wide green border round the Hospital Site, the Secretary of State's Inspector who conducted the Public Inquiry into the Planning Application for the Hospital site, required this strip only between the Cricket Field and Cow Banks before any development is allowed to begin, and not around the whole hospital site as proposed in Hertsmere's Planning Brief. Nevertheless, we persuaded the Health Authority to extend this strip round most of the site and guarantee its provision through a legal agreement with Hertsmere, thereby achieving the main objectives of the green border'*

Securing a good future for Shenley, Policy 1: A 30 foot strip should be provided round the site before any development is allowed to begin. Page 7, 2.9 says *'it is therefore envisaged that the Green Belt boundary should be drawn right round the hospital*

buildings, the staff housing to the north and the incidental open spaces between the hospital and Radlett Lane to the south. The future pattern of development and incidental open spaces would then reflect both existing site characteristics and future needs within the excluded area. Within this area there would be strong belts of trees to reinforce the distinctive character of the site, particularly as seen from the north. This revision to the Green Belt boundary will be formally incorporated into the Development Plan in the Hertsmere District Plan Review.

*Appendix B – Policy 35: **With particular regard being paid to the Area of Great Landscape Value shown on the Proposals Map, development likely to have a detrimental effect on the landscape will not be acceptable.** Regard will be paid to the setting, siting, design and external appearance of such development as is permitted.*

Policy No.18 – Agricultural Priority Areas

The needs of farming and forestry will have priority over other activities within agricultural priority areas. The following guidelines will be used in agricultural areas.....(i)
Agriculture is to be encouraged. A minimum of land in agricultural production will be lost to development, with land in high classification being completely protected from development, except where suitably located land of a lower agricultural quality is not available. *Urban related activities will be managed to minimise interference with farming.*

Maintaining the permanence of the Green Belt boundary round Porters Park, a green border or 'cordon sanitaire' is as important today as it was when Porters Park was built. It is also still important to protect Shenley Parishes agriculture. The Green Belt boundary is of specific legal concern and should in our view preclude the inclusion of Site S1 and S2 into the next round of consultation.

It seems that the following changes were agreed by the Hertsmere Development Services Committee on 4th October 1989 and the Park Trust Board on 23rd November 1989:

1. The widening of the 30ft strip south of the properties in North Avenue (for the length of a proposed surface water balancing pipe (this is the area now known as Cow Banks Wood and the proposed S1 would develop all the fields going up to Cow Banks).
2. The inclusion of that part of the 30ft strip adjoining the southern boundary to No.1 Black Lion Hill in the competition site (i.e. its exclusion from the park)

It would seem that there ended up being some problems with the 30ft border but at a meeting of Hertsmere Borough Council's Environment Committee on 2nd October 1991 it was agreed that the 30ft border would be reinstated and this proposal was ratified by the full council a month later. Unless there have been any other proposals since this should be the position currently.

5. Housing Need and Delivery in the Parish

5.1 The Parish commissioned a Housing Needs Study for the Parish (<http://shenleyvillage.org/neighbourhood-plan/supporting-documentation/>) and we submit this evidence base as part of our representations. As you know the study was carried out by AECOM in 2018. We wish you to respond to it as part of this consultation.

5.2 More generally, we require HBC to confirm in their response to our representation that any development consented within the Parish is accounted for in relation to the housing need identified for the Parish Council.

5.3 Furthermore we request that the 'Neighbourhood Element' of the Community Infrastructure Levy within the Neighbourhood Plan (25%) is to be transferred to the Parish Council in a timely manner and in accordance with the legislation.

6. Summary

6.1 In summary, we strongly object to any priorities for sites being made or put forward as site allocation development in the next version of the Local Plan for Hertsmere without the publication of established 'constrained' housing and employment needs, master planned options for sites near public transport nodes with detailed assessments of site related and cumulative impacts. This to be underpinned by detailed and costed infrastructure delivery plans so that options can be assessed in a meaningful way.

6.2 Furthermore we believe that further technical work should be carried out for each site including viability of affordable housing and it should be published and properly consulted on. Given the scale of change proposed, we feel this consultation must to be carried out after the local elections scheduled for May 2019. It ought to allow for a well prepared and substantiated public deliberation on options and alternatives in accommodating growth in the future in the borough and Parishes.

6.3 We further require HBC to publish a draft Local Plan with polices before the next round of consultation so there is more clarity on what is expected from development in terms of habitat protection, design quality, housing and employment mix and infrastructure provision. This in support of the NPPF and indeed taking careful account of the vision, objectives and policies in emerging Neighbourhood Plans including our own Shenley Plan.

7. Additional Feedback on the Council's Potential Sites Publication and supporting documents for Sites in the Parish of Shenley plus H2

In the following - and in light of the significant grievances outlined above, we highlight below matters we were able to identify regarding your evidence base and omissions in your assessment work for individual site located in full or parts in the Parish of Shenley. This by and large in addition and on reflection of your identified merits and challenges of individual sites.

7.1 New very large settlement development

We are of the view that as and when large swathes of land for thousands of homes and needed facilities are taken out of the Green Belt, HBC must insist on layouts and densities that are akin to towns with a shopping/employment and service centre in walking distance to the new homes. We are of the view that the low densities and the large amounts of land being currently promoted being taken out of the Green Belt are not compliant with the new NPPF 2018 basic principle of supporting sustainable patterns of development, specifically with §123, §117 §122.

Using less Green Belt land and supporting sustainable patterns of development with good public transport access are at the heart of this and indeed the new NPPF 2018 (§123, §117 §122). This is relevant for those very large sites not located in walking distance (>800m) from basic shops and services.

The government wants the new garden cities and towns to be extraordinary – ‘*exemplars of high quality and good design*’, sustainable and with enough ‘*resources to reinvest in the renewal of the physical place and support a thriving, diverse community*’. It is seeking to achieve this by

a) Setting out the aims of the oversight authority, including ‘*to plan for the creation of a high quality settlement which is a sustainable community*’; and

b) Setting out requirements for the development corporation including to ‘*aim to contribute to the achievement of sustainable development*’ and ‘*have regard to the desirability of good design*’.

There is guidance published which we feel needs to be explained and widely shared with all Hertsmere communities.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721078/New_Towns_Guidance.pdf

c) Our Draft Shenley Plan and the Radlett Plan are in support of treating applications favourably (§127 NPPF 2018) from developers that develop Design and Development Briefs, using community design workshops and other known methods of co-designing with communities as well as the Building for Life 12 Quality Mark to support high quality design. We would expect the New Local Plan to support this approach in light of the scale of impact these new communities will have on existing communities and the wealth of knowledge that local communities have to offer in assisting developers and their design teams in achieving well-designed places.

7.2 Site Capacity

We require that all site capacities are stated as ‘Estimated capacity for x dwellings’. We do not think it is appropriate at this work stage to say anything more than that.

7.3 Draft Sustainability Assessment

The limitations of the Draft Sustainability Appraisal presented as part of your site assessment work are described on page 21 of the published Draft Sustainability Appraisal. The lack of detail on site development proposals relevant for the assessment has been highlighted in that section. It is unhelpful that key appendices are not published as far as we can see on the Council's website or consultation platform.

7.4 High Level Traffic Impact Assessment

The Traffic Impact Assessment across all larger sites will have significant impacts on London Road, Black Lion Hill, Woodhall Lane, Green Street and Cowley Hill and surrounding key junctions. We strongly object that you only consider roads right adjacent to large site being mentioned in your summary assessment for each site (Benefits and opportunities Challenges and constraints table). This is very unhelpful and incorrect in our view. The sites and the overall scale of development within a 5 miles radius of the key village roads and junctions also need to be considered. As you know, the daily *10,000 traffic movements through the village are by no means local traffic hence the scale of growth expected to take place within perhaps 20miles radius over the next decade will have significant impacts even if there is not one more home or employment space built in Shenley Parish.

Overall, we feel that the High level Traffic Impact Assessment has not given enough detail or weight in relation to potentially allocating sites supporting sustainable patterns of development. The independent examination of the New Local Plan will specifically look into how the proposed local plan Green Belt release and site allocations contributes to sustainable patterns of development. It will closely look at the provision of accessible public transport and also walking and cycling provision. The need for travelling needs to be reduced in the first instance, access to high frequency public transport and much improved walking and cycling provision to be prioritised over road infrastructure improvements. Car parking standards for any development in our Parish have to be looked at differently because we are a rural village, car dependent because there is no reliable public transport. Therefore any new development in the Parish will require adequate parking. If there are three working members in a household they are likely to need three cars to travel to work because most places in Shenley are poorly serviced by public transport. So therefore mass building in Shenley Parish is unsustainable unless there is improved public transport.

*The 10,000 daily traffic movement through Shenley village figure is now over eighteen months old.

7.5 Land Availability

We are aware that landowners in parts of Site H1 at least (larger area) and sub area h. have made it publically known that their land is not available for development. This is indicated in your assessment summary for the site already. We would therefore expect this site no longer to be considered in your next phase of this site allocation process. We understand that there are 15 landowners to consider.

7.6 Green Belt assessment (Stage 2)

We understand from your FAQ that the Green Belt Assessment is only the view of a consultant and that it is the councillors that will decide on the strategic site allocations in new Local Plan. We strongly object to this notion of devaluing the technical evidence base. This undermines the importance of independent assessment work and evidence in this highly technical and emotive area Green Belt release. The inspector at examination stage which will have to look at each of the sites that are considered to be taken out of the Green Belt in light of Para 137 in the NPPF: 'Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development.' Green Belt protection is strongly supported by the NPPF 2018 and the tests are robust and challenging when it comes to taking land permanently out of the Green Belt. As there is no Government change to Green Belt policy we find it hard to see how you can justify further development in the Green Belt.

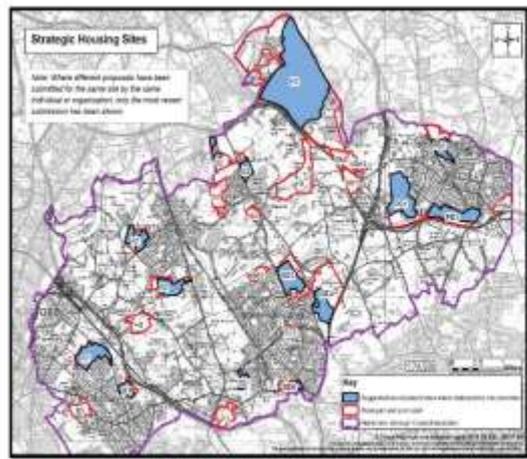
7.7 Primary School Provision

We understand a third of the pupils in Shenley Primary School on London Road are residents of Borehamwood. This fact was confirmed by Katy Longley, Head of Shenley Primary School until July this year, during a conversation with Cllr Nicky Beaton at the School Fair on 20 May.

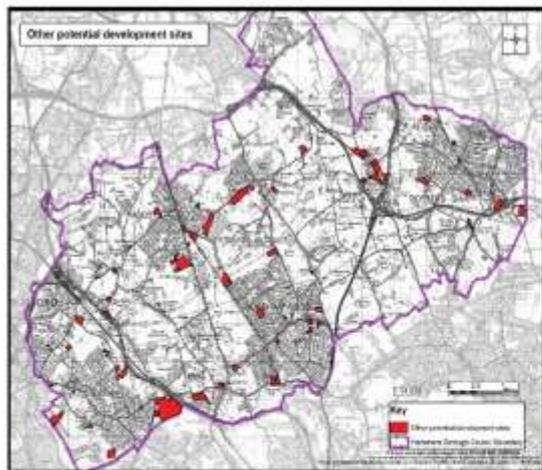
We do not think this is a good situation and before a new primary school is considered for a growing Shenley this needs to be put right. Less traffic is only one aspect of this. We are also of the view that the school (with a number single-storey buildings on site) has the capacity to be expanded on site. We ask HBC to provide the necessary evidence and business case from the education authority regarding the statement that 'an expansion on site is not possible' before any further action is taken in terms of site allocations and conversations with promoters and applicants. The school is a central part of our community and its location on London Road is import to the Village and all the other services and facilities located along London Road. Our Clore Shalom School, located in walking distance of potentially Site 3 is a voluntary aided primary day school that serves the local and wider Jewish community. This needs to be considered in the assessment of accessibility to educational facilities.

We will now comment about each of the proposed sites including the sites you give Borehamwood references which are actually in Shenley Parish.

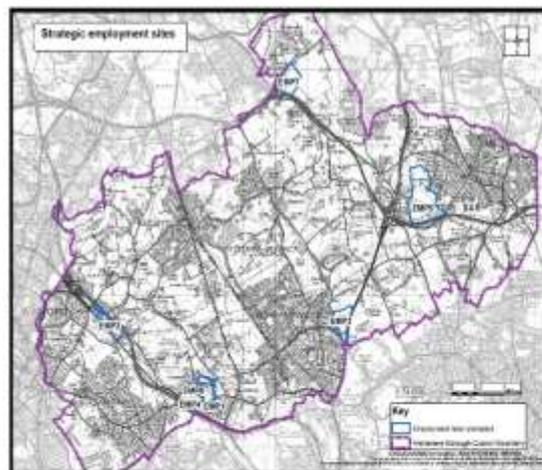
Strategic Sites (with > 250+ homes estimated site capacity) in Shenley Parish Council



Potential sites for Housing and Employment | Hertsmere Borough Council | 11



Potential sites for Housing and Employment | Hertsmere Borough Council | 12



Potential sites for Housing and Employment | Hertsmere Borough Council | 13

Table 4.2: SA Scores for potential sites for housing

	SA 1: Employment	SA 2: Population	SA 3: Housing Potential	SA 4: Employment Potential	SA 5: Health	SA 6: Air and Noise	SA 7: Flood Risk	SA 8: Landmarks	SA 9: Infrastructure and Services	SA 10: Sustainability and Resilience	SA 11: Water Quality	SA 12: Air Quality	SA 13: Energy Efficiency	SA 14: Energy
Hatched areas represent 'Out of scope'														
SA1	+	+	+	+	+	+	+	+	+	+	+	+	+	+
2-weak through very strong positive outcomes														
PR1	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR2	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR3	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR4	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR5	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR6	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR7	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR8	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR9	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR10	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR11	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR12	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR13	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR14	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR15	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR16	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR17	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR18	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR19	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR20	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR21	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR22	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR23	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR24	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR25	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR26	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR27	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR28	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR29	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR30	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR31	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR32	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR33	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR34	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR35	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR36	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR37	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR38	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR39	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR40	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR41	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR42	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR43	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR44	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR45	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR46	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR47	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR48	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR49	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR50	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR51	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR52	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR53	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR54	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR55	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR56	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR57	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR58	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR59	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR60	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR61	+	+	+	+	+	+	+	+	+	+	+	+	+	+
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PR68	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR69	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR70	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR71	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR72	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR73	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR74	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR75	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR76	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR77	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR78	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR79	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR80	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR81	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR82	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR83	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR84	+	+	+	+	+	+	+	+	+	+	+	+	+	+
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PR91	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR92	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR93	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR94	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR95	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR96	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR97	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR98	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR99	+	+	+	+	+	+	+	+	+	+	+	+	+	+
PR100	+	+	+	+	+	+	+	+	+	+	+	+	+	+

4 Sustainability Appraisal Findings for Potential Sites for Housing and Employment

- 4.1 The table below lists the results of the SA for potential sites for housing and employment, being used to inform the strategic planning process. Table 4.1 and Table 4.2 show the results of the SA for each site. The results are presented in a table below. The table below is a summary of the results of the SA for each site. The table below is a summary of the results of the SA for each site.
- 4.2 Table 4.1 shows the appraisal results for each site, which are used to inform the strategic planning process. The table below is a summary of the results of the SA for each site.

Site ID	Location	Estimated Capacity	Development Potential
SA1	Station Way (near 45)	100	High potential
PR1	Station Way (near 45)	100	High potential
PR2	Station Way (near 45)	100	High potential
PR3	Station Way (near 45)	100	High potential
PR4	Station Way (near 45)	100	High potential
PR5	Station Way (near 45)	100	High potential
PR6	Station Way (near 45)	100	High potential
PR7	Station Way (near 45)	100	High potential
PR8	Station Way (near 45)	100	High potential
PR9	Station Way (near 45)	100	High potential
PR10	Station Way (near 45)	100	High potential
PR11	Station Way (near 45)	100	High potential
PR12	Station Way (near 45)	100	High potential
PR13	Station Way (near 45)	100	High potential
PR14	Station Way (near 45)	100	High potential
PR15	Station Way (near 45)	100	High potential
PR16	Station Way (near 45)	100	High potential
PR17	Station Way (near 45)	100	High potential
PR18	Station Way (near 45)	100	High potential
PR19	Station Way (near 45)	100	High potential
PR20	Station Way (near 45)	100	High potential
PR21	Station Way (near 45)	100	High potential
PR22	Station Way (near 45)	100	High potential
PR23	Station Way (near 45)	100	High potential
PR24	Station Way (near 45)	100	High potential
PR			

Site S1 32ha – Land West of Shenley, off Porters Park Drive (back of Porters Park next to the Cricket Club – 570 homes (estimated) Site reference: HEL370 Promoter: Heronslea

We object to this site being considered further.

1 To prevent Shenley Village /Porters Park merging with Radlett and – via the potential Site 2 - with the Harperbury Hospital Site and to preserve the setting and special character of Shenley Village and Porters Park and to assist in safeguarding the countryside from encroachment, Site S1 should no longer be considered as potential site in the next phase of your Green Belt release and site allocation work.

2. The NPPF makes it clear that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified and sustainable pattern of development is supported. Topography and sheer distance makes access to Shenley village and services challenging for pedestrians. The poor accessibility scoring of 2 while relatively low density (17 dwellings per ha) is unlikely to result in an area with enough demand for public transport. A suburban car dependent area is the consequence.

3. The chance to strengthen village life economically and socially through increased local footfall, taking up school places and socially engage are not likely to be of significant scale due to the distance of the development to London Road. The building of a new school on this site would in our view undermine the vitality of the old village and its services. As a Parish Council we want our village and our village life seen strengthened through growth in population and employment and not weakened.

4. The Green Belt boundary obligations of the Council when you redrew the settlement boundary for Porters Park in 2016 (§85 NPPF 2012, When defining boundaries, local planning authorities should satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period & define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

And the promises and legal agreements made when Porters Park and Shenley Park were negotiated are to be upheld

5. The land identified as S1 is currently in agricultural use and not just open fields as stated in your site assessment pro-forma

6. We do not see any evidence which would suggest that this low density development can in reality fund a new school, local centre and other services as mentioned in the Sustainability Appraisal and deliver 30%+ affordable housing.

7. Flood Risk: Your own Flood Risk Assessment suggests significant constraints for surface water flooding at this location. **We trust that HBC will consider this constraint in light of climate change for the protection of further residents.**

Further detailed comments

Sustainability

- a) 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**”
- b) 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

- a) Flood zone (FZ3) and local wildlife site within and adjoining the southwest of the site
- b) Landscape and visual impact would be considerable.
- c) There are a number of TPO protected trees around the perimeter of the site.
- d) The site is *extensively* used by walkers – Shenley and the wider community.
- e) 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.
- f) 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.

Road Traffic, Safety and Journey Times

- a) The only vehicle access appears to be from Radlett Lane, via ‘Draft HELAA - a relatively narrow gap between the Sand Plantation and cricket ground, narrowing to a point adjacent to Kitwells Brook and associated flood zone opposite Auriol Lodge. The frontage onto Radlett Lane is heavily planted and close to a bend in the road. The Council’s SFRA identifies for new developments located in areas at risk of flooding, safe access/egress must be provided’. The AECOM site report disregarded this site on road safety issues because of the access in this blind bend.
- b) 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 add to traffic congestion at peak times. This is a two lane very bendy road. These issues were pointed out at the Public Enquiry in 1986 regarding the Porters Park development and as was feared at that time the current level of traffic has made this narrow lane into a bottle neck when people are attempting to access Radlett Station and a five minute drive can take up to 40 minutes. There were no road improvements for the Porters Park development because it is impossible to widen the lane here. Any increased development in Shenley will exacerbate the situation even more.
- c) Homes on this site would be car-dependent as there is little to no public transport alternative.
- d) Building here would go against sustainable building principles in NPFF – building within 5 minute walk of a train station.

You state in your consultation document that your proposals are likely to mean that it will be necessary for growth to be accompanied by significant investment in local public transport and other initiatives such as car clubs as well as measures to lower the number of new cars on the road by locating development near to local services. S4 is the only site that could connect to existing services and support existing services. .

About eighteen months ago the Parish Council tried to start a local peak hour mini bus service to Borehamwood & Elstree and Radlett Stations for commuters and school children but not enough people expressed interest for it to be viable. Residents in Shenley are and will continue to be dependent on cars in a way that residents in Borehamwood, Bushey, Potters Bar and Radlett are not for the simple reason that we do not have a train station within reasonable walking distance.

Infrastructure issues (doctor's surgeries etc.)

- a) 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.

Maintenance of Green Belt:

- a) This area forms an essential gap between Shenley and Radlett. Developing this site would go against the Local Plan Core Strategy objective and NPPF 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.
- b) Your Draft HELAA 2018 says that the area is 'not suitable under the current planning policy framework due to its Green Belt status. However notwithstanding the importance of the Green Belt in this location in maintaining separation between Shenley and Radlett, due to the access and flood risk constraints, the site is not considered suitable for development' In areas at risk of flooding, safe access/egress must be provided and we do not believe this would be possible in relation to this site using an access onto Radlett Lane. The independent Stage 2 Green Belt assessment did not recommend the sub-area within which the site is located for further consideration. We trust that you will listen to this recommendation.

Historic Environments: There are statutory and locally listed buildings within Shenley Park/Porters Park estate and at Wild Farm/White House to the north that would be impacted by a new development.

Site S2 – Land between Harperbury Hospital and Porters Park 30ha (Shenley side) – 230 (adding to the 206 currently under construction at Harperbury Hospital site on the St Albans side).

We object to this site being considered further.

A masterplan, produced by the St Albans City and District Council together with the surrounding communities, for the brownfield land within the Harperbury Hospital site needs to be given priority before land is taken out of the Green Belt nearby. This is NPPF policy. A large part of the mixed-use development should be considered in our view as retirement village this in recognition of the significant need, identified in both boroughs.

We strongly object to these parcels due to coalescence and loss of Shenley Green Belt. We do not want to join up to a 'Harperbury Village'.

1. The Green Belt Review II states: 'The northern part of Site A, comprising approximately 5ha in Hertsmere, together with an adjacent area to the west of the tree belt, in St Albans, is more self-contained and may have a reduced impact on the purpose of the Green Belt.
2. In our view a new settlement at Harperbury Hospital maximizes the use of brownfield land and previously used land. This under the premise to use the old buildings as a starting point, very high rural design standards for new buildings and with a visionary approach to retirement living (active and not sedentary, multi-generational, supporting residents in engaging in their hobbies such as gardening, crafts, arts, music, sports, dementia village see examples: <https://www.dementiavillage.com>)
3. Air quality and noise level impacts from the M25 corridor on the health and wellbeing of the future residents, employees and visitors need to be considered comprehensively and reduced by creating a green lung / buffer zone between the M25 and the edge of the new settlement
4. With this Site there are not just one but two 'blue' parcels of land in S2. One north and one south. S2 adjoins the new already consented development of 206 homes on the Harperbury Hospital site. There are additional land parcels within and adjoining the former Harperbury Hospital site as well 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. We have concerns how development of these two sites would be coordinated with the development on adjoining site/s being managed by St Albans City Council. Under the duty to cooperate, we expect Hertsmere and St Albans to be leading on this important work together.
5. We are very concerned about the "Strategic Land promoted" red line – this may indicate that the site would become much larger than just the blue areas indicated on the map now which would give us even more of a coalescence issue.
6. If all the development proposals for the Harperbury hospital area that Hertsmere and St Albans Councils are considering alongside this land, the Harperbury area could potentially expand to 1000-2000 new homes (effectively another village/town).

7. We have concerns how development of these two sites would be coordinated with the development on adjoining site/s being managed by St Albans City Council.
8. Flood Risk: Your own Flood Risk Assessment suggests significant constraints for surface water flooding in this location. We trust that HBC will consider this constraint in light of climate change protection of further residents.

Site S3 20ha – Rectory Farm, Land East of Black Lion Hill, Shenley, next to Combe Wood and St Botolph’s Cemetery – 370 homes (estimated) Promoter: Savills on behalf of Comer Homes. Owner has indicated that the site could be expanded eastwards into agricultural land under the same ownership

We object to this site being considered further.

1. You identified “Local highways impact including cumulative effect of additional traffic onto Black Lion Hill”. In our view the traffic impact of a development of this scale will also be felt on London Road, Rectory Lane and Radlett Lane to a great degree. Based on information which (now over eighteen months old) there are 10,000 traffic movements through Shenley. 368 homes would generate at least 736 extra cars driving in and through the village, probably more. 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. Homes on this site would be car-dependent as there is little or no public transport alternative. 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. We must stress again that you can’t make people use car clubs however desirable nor can you with today’s extremely busy lifestyles make people walk or cycle, not in a rural village. You must remember that we have a large elderly population. These facts have to be given proper consideration and must not be dismissed.

Building here would go against sustainable building principles in NPPF – building within 5 minute walk of a train station. There is also no bus service every 3 minutes to a train station or local services. Bus services are infrequent and unreliable.

2. Services: Gateways Surgery has closed its books to new patients so there will be no healthcare access for people in this development. Healthcare facilities are not within HBC power to deliver. This problem is of great concern to our community.

Our residents are asking 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? Members of the Shenley Neighbourhood Plan Steering Group and many residents are particularly concerned about this. Currently residents of Shenley have to use either or Watford or Barnet Hospitals which are already oversubscribed.

3. Topography: the site is located on the bottom of the hill. This will make it very unattractive to walk or cycle into Shenley Primary School for using the school, shops and community facilities. The possible positive economic and social impacts of having a larger population supporting local business and shops will be therefore limited. The chance to strengthen the village and village life through increased local footfall, taking up school places and socially engaging with other residents are not likely to be of significant scale due to the distance of the development to Shenley's shops, community facilities and services. The building of primary new school on this site would in our view undermine the vitality of the old village and its services. As a Parish Council we want our village and our village life seen strengthened through growth in population and employment and not weakened.

4. The impacts of the setting of the Grade II* Listed St Botolphs is not mentioned as a constraint in your assessment summary and we feel this is an oversight given the significance of the building.

5. We have been expressing our concern about development on Comer Homes land since early 2017. For good planning reasons mentioned above and below we do not think it should be developed. We fear that if planning permission is given for this site it is only a matter of time, probably a short time before further permissions will be given. The owner's comments, listed above and in the Potential Sites consultation document, give us good reason to fear this.

Notes in your 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). That would lead to coalescence between the new Garden Village and Shenley. For this reason H1 and S3 should not be further considered if HBC is really keen on the H2 site.

6. Landscape and Biodiversity

There is an area of protected woodland to the northeast. The site also adjoins Coombe Wood which is ancient woodland.

Development on this site would severely affect the landscape and visual impact would be considerable. Having development beside Black Lion Hill would have a significant potential negative visual impact on the approach to the village. Brand new housing estate vs. open fields leading to our country village - we know what our community wants. The majority of the land comprises open fields with lovely long views and currently maintains an *unspoilt rural character*. There are many rights of way across the fields and they are extensively used by Shenley residents and the wider community.

The Draft HELAA 2018 report states 'Expansion of Shenley to the east of Black Lion Hill however would lead to significant encroachment into the countryside. The independent Stage 2 Green Belt assessment did not recommend the sub-area within which the site is located for further consideration. We trust that HBC will listen to this recommendation.

7. Flood Risk: your own Flood Risk Assessment suggests significant constraints for surface water flooding at this location. We trust that HBC will consider this constraint in light of climate change for the protection of further residents.

8. Health: 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. This information is particularly relevant to potential development on this site as it is very close to the M25.

Maintenance of Green Belt:

- **The site prevents sprawl and maintains the gap between nearby settlements and prevents “ribbon development” along London Road.** This proposal goes against Local Plan Core Strategy objective of preventing urban sprawl and the coalescence of towns.
- **‘Draft HELAA 2018 ‘The independent Stage 2 Green Belt assessment did not recommend the sub-area within which the site is located for further consideration’.**
- **Draft HELAA 2018 says ‘Expansion of Shenley to the east of Black Lion Hill however would lead to significant encroachment into the countryside’.** We trust that HBC will listen to this critical comment. It is very clear. It is extremely important to the majority of Shenley residents.

Site S4 2ha – Back of London Road, Shenley Grange south and Shenley Grange north, bordered by Woodhall Spinney HEL348 and HEL349 380

We support this location for new homes and facilities, but object to allocating the stated 380 homes on this site. Aligned with the landowners, we are of the firm view that this site is capable of accommodating far less homes than stated in your consultation material.

We support this Site 4 being developed as a Neighbourhood Development Order (under §146 f. National Planning Policy Framework) in the first instance and by doing this keeping the land in the Green Belt and the old village. The next version of the Shenley Neighbourhood Plan (Regulation 16) also supports Site S4 as a ‘Special Policy Area’ to ensure that the Conservation Area, the edge to the open countryside, green belt, woodlands and the numerous statutory and locally listed buildings – all contributing to the creation of this distinct rural setting - are considered carefully and not harmed as and when new development is designed and delivered. This is of particular relevance in case the Neighbourhood Development Order, produced by the Parish Council, cannot be delivered (under §146 f. National Planning Policy Framework).

The site is expected to support many of our Neighbourhood Plan objectives and respect the emerging design code policies in the Neighbourhood Plan

1. Between 200 and 250 rural homes built to Shenley Plan Design Codes meeting our identified housing need in the Parish incl. a good proportion of self-build and self-commissioned homes.

2. A village square around the existing pond along London Road capable of holding small outside / temporary events incl. the occasional markets and outdoor seating
3. A Parish Council owned and run new community building with co-working space, café, meeting facilities and rental accommodation for elderly as a means of earning its keep. This to overlook new village pond and square as its central building.
4. Supporting pedestrian and cycling improvements on London Road to help connecting the new community space with key village amenities such as the school,
5. A pedestrian route from London Road to the Spinney (Footpath No.10) and footpath to the south of the site to provide better and more routes in the Village and Porters Park.

We would like to encourage HBC to support us in this and consider this site further in their search for sites to grow our village, provide a new focal point for our village life, support the local economy and meet much of local housing needs in walking distance to all the key local village facilities.

Further comments

Site S4 was reviewed by AECOM as part of the Shenley Neighbourhood Plan Site Assessment January 2018. AECOM concluded that Site 4 which includes HBC Site 4 is the best site of all our sites to be developed for the following reasons:

- a) The site is within the Green Belt and largely outside the infilling areas of the service village envelopes, whereby development of the sites conflicts with Local Plan policy;
- b) The Green Belt Parcel which includes the site has been identified to be brought forward for further assessment in Stage 2 of the Green Belt Assessment, to potentially identify weakly performing green belt sub-divisions (of green belt parcels) for removal from the green belt.
- c) The area that includes Site 4 has been identified in the Hertsmere Local Plan: Issues and Options as a potential growth area for enlargement of Shenley Village;
- d) The Site is in a favourable location for services and amenities, and presents an opportunity to balance growth along the western edge of the central spine of the village, uniting the old and new parts of Shenley Village;
- e) While the site is heavily screened and can only largely be seen from local residences, natural and built heritage constraints would require sympathetic development proposals to mitigate and minimise impacts on woodland habitats and the setting of the conservation area.
- f) The available part of the site is appropriate for allocation subject to a policy change in the Local Plan removing the site from the green belt.

The Arup Stage 2 Green Belt Assessment has recommended 'part of the sub-area within which HEL348 and HEL349 are located could be considered further'. The Draft HELAA 2018 says 'However, were exceptional circumstances to exist which could justify amending the Green Belt boundary/creating a village inset in this location in line with paragraph 138 of the NPPF and subject to more detailed technical assessments including traffic and landscape visual impact assessments, the site can be considered to be suitable, available and achievable for the delivery of '263 in the case of HEL348 and 121 in the case of HEL349'. This gives the figure 380 listed by HBC (to be accurate 384)

We would not want 384 homes to be built on S4. It would give us a dense urban development along the lines of Porters Park. It is not only wholly undesirable but the more urban development we have the more likely it will lead to yet more permissions for urban development in Shenley Parish and therefore ultimately we will lose our fight to remain a village which is categorically not what we and our community want.

We agree with the AECOM report recommendation. There is no point commissioning a detailed expert report to discard the advice unless there are very good reasons to do so. We conclude that if we have to have development in Shenley then it must be in the most favourable position for the Village for no other than good planning reasons. We do not want a dense urban development on our AECOM favoured site, we want a rural open development. For this reason we are exploring doing a Neighbourhood Development Order as it will enable Shenley Parish with community consent via a referendum to give planning permission for an open rural development of around 220 homes. The process will mean that the community are involved in the design process and they then get to vote to say yes or no to the plan. The alternative option proposed by Hertsmere involves removing the site from the Green Belt to enable 384 homes to be built. We do not agree with this approach.

Sustainability

- a) 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”
- b) 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

- a) *The landscape and visual impact would be considerable if the land was taken out of Green belt and HBC gave planning permission for a dense urban development similar to Porters Park – 380 homes.* We do not want this to happen. An NDO on this site would mean that any development on the site would be open and rural in feel. The emphasis would be to develop the land sympathetically making sure Woodhall Spinney and Spinney Path are not spoiled. This is something residents feel very strongly about.
- b) If HBC’s suggested numbers were applied, 380, the number of additional cars on the roads would increase levels of pollution in the area. This goes against HBC’s Local Plan Core Strategy objective of protecting and enhancing the environment in Hertsmere by addressing the impacts of pollution.
- c) The site is adjacent to local heritage sites including Shenley Village Conservation Area and an archaeological site – it must be protected. A dense urban development would be detrimental, a sympathetic rural, open development would not put these elements at risk.
- d) Currently there are no footpaths through the site so only the owners can enjoy the landscape and lovely views. Sympathetic rural development would give the community access to some new footpaths, open space, play areas and provide a new village green with very attractive ponds. It would increase village amenities.

- e) Woodhall Spinney is a local wildlife site so it has to be protected. **The Parish Council and Neighbourhood Plan Steering Group would like the Spinney to officially become recognised 'Local Green Space'. This has been suggested by Hertfordshire County Council in their Shenley Plan Regulation 14 submission.**

Road Traffic, Safety and Journey Times

- a) If the land was taken out of the Green belt and 380 homes build there would be up to 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.
- b) As with the other sites homes on this site would be car-dependent for journeys out of the village there is little to no public transport alternative at the moment. The 658, 602 and 358 bus services are infrequent. Also there is no bus service every 3-5 minutes to a train station or local services.
- c) There are concerns about the limited access to site via a private Road and the effect of additional traffic onto London Road. Residents in the immediate area worry about the effect on the Harris Lane junction and pedestrian crossing.

Infrastructure issues (schools, doctor's surgeries etc.)

- a) Shenley Primary School is highly accessible to pupils that might grow up on this site. We would expect children from this site to be permitted to join Shenley Primary School.
- b) Lack of local secondary school places provision. This is not within HBC's power to deliver.
- c) Gateways Surgery has closed its books to new patients so it would be beneficial to have new services located at such a central location/as part of the village square.

Maintenance of Green Belt:

Loss of Green Belt land. We do not want the Site taken out of Green belt as Porters Park was. It is extremely important to our community that it remains Green belt.

Site BE3 – Wrotham Park Land off Cowley Hill. Part of this site has been recommended for further consideration, along with adjoining Site BE4

This site is not in Borehamwood it is in Shenley Parish and should have had a Shenley reference. Giving it a Borehamwood reference has caused confusion.

- a) Additional cars from this and other possible developments in the area would severely impact journey times from Shenley to Elstree/Borehamwood Station.
- b) Residents on this site would potentially look to use Shenley amenities, causing additional traffic pressure.
- c) Access via Potters Lane would add additional congestion to this very narrow road.

- d) Additional cars from this and other possible developments in the area heading to Watford/St Albans/M25 could easily cause additional traffic through Shenley.
- e) It is likely to lead to additional traffic congestion in area.
- f) 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. Not only that there is no bus service every 3-5 minutes to a train station or local services

Infrastructure issues (schools, doctor's surgeries etc.)

- a) 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. The Gateway Surgery in Shenley is closed to new patients. As this site is adjacent to housing in Borehamwood, a more practical solution would be to look to the Borehamwood surgeries, but we understand that the nearest surgery in Brook Road Borehamwood has also closed its Books.
- b) 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? These issues are of great concern to our community.
- c) The area can barely cope with the repercussions to services and roads from the current spate of building under the Local Plan in place at present.

Maintenance of Green Belt:

- a) This area forms an essential gap between Borehamwood and Well End.
- b) Developing this site would go against the Local Plan Core Strategy objective of preventing urban sprawl and the coalescence of towns.**
- c) In Stage 1 of HBC's Green Belt review the conclusion was 'Development would not be suitable as the site formed part of a parcel identified as making a strong contribution to the wide Green Belt, particularly with regard to preventing encroachment into the countryside. Cowley Hill is identified as one of a number of durable boundary features with the parcel as a whole largely comprising open fields with long views and an unspoilt rural character'. We agree with this conclusion strongly. The Stage 2 Green Belt review recommends that the southern part of the sub area within which the site is located could be considered further. They think with a change of policy 787 homes could be built. We completely disagree for sprawl and coalescence reasons.**

Site: BE4 - Land off Well End (land south and east of Rowley Lane) – This site in part in Shenley Parish and partly in Borehamwood Part of this site has been recommended for further consideration with adjoining site BE3 – 610 homes.

The part that is in Shenley Parish should have been referenced accordingly. Our residents have found your references confusing.

Sustainability

- a) 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”
- b) 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

- a) A number of water courses run across the site, with some flood risk.
- b) *Landscape and visual impact would be considerable as the area as largely comprises open fields with long views and unspoilt rural character. Open farmland surrounded by hedges/tree screening*
- c) There are three Local Wildlife Sites adjacent to the norther boundary (Wood next to Well End Road) and eastern boundary (Birch Wood and Silver Hill Woodland). Cowley Farm buildings are locally listed with locally listed Well End Lodge immediately adjacent to the eastern Boundary.
- d) 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.

Road Traffic, Safety and Journey Times

- a) Site is quite a distance from centre of Borehamwood.
- b) 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.
- c) Homes on this site would be car-dependent as there is little to no public transport alternative. A few buses currently run along Cowley Hill but with the exception of 823 (Borehamwood-Garston school service only), the other routes stop to the south of the site, adjacent to Hertswood Academy – 658 (St Albans to Borehamwood) and two school routes, 358 (Borehamwood-Oaklands College, school days, twice daily only) and 601 Welwyn GC-Borehamwood). Not adequate.
- d) More 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.
- e) Possible 1220 additional cars on the road from this site. Many additional cars from this and other possible developments would severely impact journey times and traffic congestion in Borehamwood and possibly Shenley.

- f) 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.)

- a) 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.
- b) Lack of capacity at local primary and secondary schools and there is a lack of capacity at local doctor's surgeries.
- c) 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?
- d) The area can barely cope with the repercussions to services and roads from the current spate of building under the Local Plan in place at present.

Maintenance of Green Belt:

- a) **Developing this site would go against the Local Plan Core Strategy objective of preventing urban sprawl and the coalescence of towns**
- b) Development as proposed will mean the loss of a large amount of Shenley Green Belt land. **We do not agree that this should happen.**

Site H1 – Additional constraints and opportunities to be considered – 83 ha, 1500 homes (estimated)

We object to this site being considered any further.

1. To prevent Shenley Village and the potential large Garden Village (Tyttenhanger Estate , North of M25/B556) to merge, to preserve the setting and special character of Shenley and to assist in safeguarding the countryside from encroachment, Site H1 should be no longer be considered as potential site in the next phase of your site allocation work.
2. We also believe much of the land in the sub area h. is located in and adjacent the Flood Zone 2 and 3. In addition and not mapped surface water flooding occurs regularly on Rectory Lane near the Keepers Lodge. Taking the considerable topography into account, building hundreds of homes at this location will create a significant increase in run-off water and flooding issues further down along St. Catherine Bourne. This needs to be considered carefully particularly in light of the topography. The whole area covered by H1 forms part of Affinity Waters drinking water catchment area therefore if you build on it there will be a significant loss to the water catchment for the whole area.
3. There is a network of chalk mines underneath the majority of the site, which is a preserved site for bat conservation.
<https://www.gov.uk/government/organisations/natural-england>
4. There is also a large area of land adjacent to Rabley Park Farm which has been left to the nation as a permanent site for protected species conservation. See Natural England. <https://www.gov.uk/government/organisations/natural-england>
5. The remote location and lack of any physical infrastructures and indeed other constraints of the site such as numerous of right of ways, foot paths bridleways, a

geological site of regional significance, a large number of ponds, protected woodlands and meadows and manmade ground (chalk mines) suggests that this site will require significant intervention into natural systems and investment to develop the site for housing. And therefore it is questionable if affordable housing can be delivered on this site.

Site H2 – Additional constraints and opportunities to be considered – 612 ha, 4000 homes (estimated) + Employment Land (Note EMP7 is on map but not mentioned in SA table)

We require clarification as to why the largest site in the borough to be selected for a new garden village is on land which is the centre of The Watling Chase Community Forest. This is one of 12 Community Forests around England. It covers an area of approximately 18,840 hectares (72 square miles) of land in Hertfordshire and the northern fringe of London, which includes several sizeable settlements but is predominantly rural. The majority of the Forest is within the area covered by Hertsmere Borough and the whole of Shenley Parish provides the majority of the Forest land.

Hertsmere have a Supplementary Planning Guidance (SPG), which is taken into account as a material consideration in the determination of planning applications. The Secretary of State will give substantial weight to SPG in making decisions where the SPG derives out of, and is consistent with, any relevant or regional guidance and the development plan has been prepared in a proper manner. This guidance supplements policies of the Hertsmere Local Plan 2003.

<https://www.hertsmere.gov.uk/Documents/09-Planning--Building-Control/Planning-Policy/Planning-Publications/SPG---Watling-Chase.pdf>

Their establishment, development and maintenance should increase environmental quality and the net biodiversity gain. If after Hertsmere look into the issues of Biodiversity, SSSI's and the many other designations of the land shown by accessing Natural England's website Chase.pdf

<https://www.gov.uk/government/organisations/natural-england> We move onto the point below.

We object to this site being considered any further if the size of the area is not significantly reduced and the number of future residents, jobs and services significantly increased within a well-designed new town putting sustainability, health, wellbeing and climate change action at the heart of the ambition. Using over 600ha of land for even 8000 homes (double the proposed number) would still only lead to a density of 13.3 dwellings per ha. A minimum density of 40 to 50 dwellings per ha, which is more common, on 30% of the land (about 200ha) would still lead only to 9000 homes on those 200ha of land (1/3 of the proposed land).

- a) The air quality and noise level impacts occurring along the M25 corridor on the health and wellbeing of the future residents, employees and visitors need to be considered comprehensively and reduced by creating a green lung / buffer zone between the M25 and the edge of the new town. We think this whole question of

density needs to be looked from a point of land efficiency, cost of infrastructure, loss of green belt, public transport feasibility in the first instance before next steps are considered in our view. HBC and promoters to demonstrate compliance with the new NPPF 2018 specifically with §123, §117 §122.

- b) There is guidance published which we feel needs to be much wider shared, explained and applied.

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721078/New_Towns_Guidance.pdf)

SMALLER SITES PUT FORWARD FOR DEVELOPMENT IN SHENLEY

Site: HEL354 - Land north of Fox Hollows, Rectory Lane (near Pinks Farm) – 75 homes

We object to this site for the following reasons:

- a) Access is via narrow country lanes not built for this level of traffic.
- b) No public transport or local amenities – or anywhere to provide them.
- c) Building here would go against sustainable building principles.
- d) Nearest railway station, Radlett, is 3 miles away via already congested driving route and the lack of parking spaces for Radlett station is already a problem for commuters

Site HEL360 Land South of Radlett Lane, fields next to Radlett Lane. Owned by Woodhall Estates – 230 homes

We strongly object to this land being developed as it makes an important contribution to stopping ribbon development along Radlett Lane which could lead to perceptual and physical reductions in the scale of the gap between Shenley and Radlett and lead to coalescence.

It is near the edge of the village and adjoining Shenley Park and Porters Park residential estate. The land is primarily open undulating farmland. It is important Shenley landscape which for all the reasons in the other sections we do not want developed. It has to be mentioned specifically that extra traffic from development on this site would result in a huge additional burden on Radlett Lane which is narrow and very bendy and already suffering from excessive daily traffic.

- a) Close to HEL196, also Radlett Lane, with potentially 45 homes however this site falls outside the area of a possible extended village envelope.
- b) Building here would go against sustainable building principles.
- c) Additional burden on local infrastructure and roadways.
- d) Visual impact on approach to Shenley.
- e) Loss of Shenley Green belt.
- f) Nearest railway station, Radlett, via already congested driving route. Lack of parking spaces for Radlett station already a problem for commuters

Site: HEL 196 – Land beside Wilton End Cottage, Radlett, Lane - 45 homes

- a) The Draft HELAA 2018 refers to the Draft Shenley Neighbourhood Plan in June 2018, (Regulation 14) seeks the incorporation of the open area between London Road, the Spinney and Radlett Lane into an enlarged Village Envelope. Your report says that currently 'that request' is not in keeping with Green Belt status and it goes on to say that following a Green Belt review the site would be considered to be suitable, achievable and deliverable for an estimated 45* homes within 5 years.
- b) This site is actually part of the AECOM Shenley Site Allocation Report 2018's Site 4, which is indicated as the best site for all of Shenley's future housing needs for the next 15/20 years. We had originally envisaged that this site would be incorporated in the NDO to provide our housing need, however in your HELAA report you note that the land between the sites has not been put forward at this time so you have not included it as part of your 'Potential Sites' strategic site S4.
- c) In our Draft Neighbourhood Plan we show that by enlarging the Village Envelope we can then create the best strategic site for Shenley which follows the AECOM recommendation that Site 4 is the best place to direct any further development in the village.
- d) The above said access is via a narrow country lane not built for this level of traffic.
- e) Building here would go against sustainable building principles.
- f) Nearest railway station, Radlett, is 3 miles away via an already congested driving route and there is no public transport.

Site: HEL 390 – 50 homes estimated Location: Land adjacent to 52 Harris Lane Promoter - Heronslea

- a) The site substantially fulfils the green belt criteria according to NPPF policy. It prevents further 'sprawl' of Shenley.
- b) 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.
- c) 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.
- d) Parking along Harris Lane means Harris Lane functions as a single-track road. Further development would bring increased congestion to the road. 50 homes would generate at least 100 cars increasing the congestion outside the playing fields. Currently when the playing fields are used for Sunday football Harris Lane is effectively blocked as people participating park on either side of the road. Therefore any overflow parking relating to a new development will exacerbate the situation. Extra traffic will also affect the rest of Harris Lane and other nearby single track roads such as Mimms Land and Rectory Lane. There would be an increased risk to children, mothers, and dog walkers etc. who use the playing fields.
- e) Visual impact of a high density development on a small residential lane with rural character would be detrimental and would impact on inward and outward views.
- f) Building here would go against sustainable building principles as detailed for other sites as no provision exists for further population increase.
- g) A comment from the draft HELAA 2018 indicates that capacity following any Green Belt review and changes to policy could be 50 plus houses within 5 year. This site is comparable to 14 London Road, TP/10/2363 Erection of 10 cottage style houses (10 x 3 bedroom dwellings) with associated car parking. Should you move the

recommendation to Green Belt release, as the sites are very similar in size, to keep the rural feeling we suggest there are no more than 10 new dwellings on HEL 390 as per TP/10/2363/Old Nursery Close.

. Yours sincerely,

On behalf of Shenley Parish Council and Shenley Neighbourhood Plan Steering Group

Nicky Beaton

Cllr Nicky Beaton
Vice Chair Shenley Parish Council
Chair Shenley Neighbourhood Plan Steering Group

Rosemary Gilligan

Cllr Rosemary Gilligan
Councillor Shenley Parish Council
Vice Chair Shenley Neighbourhood Plan Steering Group