Policy & Transport Team

Hertsmere Borough Council BY EMAIL

Civic Offices

Elstree Way

Borehamwood

Herts WD6 1W December 2021

Dear Ross Whear and Mark Silverman,

**HERTSMERE’S DRAFT LOCAL PLAN REGULATION 18 ENGAGEMENT**

As a member of Elstree and Borehamwood Green Belt Society (EBGBS) I am writing with my response to the Regulation 18 Draft Local Plan (DLP).

1. **Draft Local Plan Engagement, Consultation and Response Period**

I am unhappy HBC have not fully engaged with Herstmere residents. The DLP is complex and lengthy so a further extension beyond 6th December 2021 should have been provided. I ask that comments be accepted and considered until the end of December 2021.

**2. Green Belt**

I believe there is a lack of robust protection of the green belt, with over 10% of the Green Belt land in Hertsmere (1025 hectares) being included in the DLP.

I ask that HBC use the National Planning Policy Framework (NPPF) to limit land allocation where it is designated as protected, including Green Belt.

Green Belt is essential for human health and wellbeing, as habitats for our wildlife, for farming to live more sustainably and to preserve our environment, keeping air clean and reducing CO2. In urban areas Green Belt is our most valuable asset and should be protected at all costs.

Following Covid-19 a higher value is put on natural open space and footpaths within walking distance of homes and people have become more aware of the importance of sustainability and environmentally friendly practices.

I request that you ask to limit the land allocation as so much of Hertsmere is protected Green Belt. I also request you only use Green Belt land in exceptional circumstances and that any land used is built on as small a footprint as possible.

**3. Housing Numbers**

I do not believe the housing numbers being used are acceptable and should be lowered in line with Government Cabinet members comments, CPRE recommendations, 2018 or more recent figures, effects of levelling up and post Covid behaviour change.

I request you urgently contact Mr Gove and Mr Dowden to ask what they can do on behalf of your community to reconsider the housing figures you are currently mandated to use and request an assurance that more up to date housing and demographics information will be incorporated before the Local Plan moves to Regulation 19.

I request you ask that the special formula that the government provides for authorities with large swathes of green belt with the NPPF, which allows councils to limit land allocation where it is designated as protected, including Green Belt*,* be used to reduce the housing numbers required of Hertsmere, as insufficient Brown Field sites are available.

I request you consider within the plan, and have proof that this has been done, the 2021 Census data, the impact of BREXIT, the pandemic, climate change and other recent and forecast social and economic trends.

I request you consider all empty properties, planned vacancies (due to increased working from home or businesses closing) or poorly maintained properties to be used as homes or replaced with new housing to enhance our towns and avoid building on Green Belt land.

**4. Types of Homes Planned and Housing Density**

Homes in the DLP are not in line with the needs of the local population. I ask that the ‘affordable homes’ target for each site be met with **no exceptions**.

Regarding housing density, according to CPRE, most developments could be planned at 100 dwellings per hectare or more. Hertsmere's proposed new housing densities are - site north of Barnet Lane would at 19.8 dwellings/ha, site south of Potters Bar at 14.2 dwellings/ha, and Bowmans Cross less than 10 dwellings/ha. Building at high density would reduce the amount of Green Belt HBC requires to build on by 80% or more.

I ask that the densities of housing be reviewed and increased to ensure lower cost housing can be built using the minimum of Green Belt land. I ask that you consider adding layers to existing flats or converting larger properties into apartments.

I strongly believe that Green Belt should be used only after careful consideration and should carry a heavy levy on the developer. Well-designed ecologically friendly blocks of flats would save green space. I ask that the Planning Department take the lead on behalf of the local community.

**5. Brownfield Register**

The Chair of London Green Belt stated at their meeting on 24/11/21 that councils have an obligation to compile a Brownfield Register. The Brownfield Register for Hertsmere is dated December 2017. Some of the sites have already been developed. I urgently request HBC draw up and publicise an updated Brownfield register, taking account of all newly vacated, empty, unused, derelict and potentially available sites.

**6. Proof of local need – Schools and Care facilities**

I ask that the local need for these new schools and care facilities be proved and if not required, as we anticipate, they be removed from the plan.

**7. Traffic**

Traffic in the Elstree and Borehamwood area builds up heavily at morning rush hour and again at school run time and evening rush hour. Particular areas of slow, and often gridlocked, traffic are:

* A1 heading towards Stirling Corner roundabout
* Barnet Lane from Stirling Corner roundabout to the roundabout for Furzhill Road and then again past Deacons Hill Road nearing Elstree Village
* Elstree Hill both north and south of the traffic lights
* Deacons Hill Road at both ends
* Allum Lane at both ends
* Furzhill Road at the station roundabout end
* Shenley Road along the whole length from the station to Elstree Film Academy

I oppose the developments that will worsen these hot spots:

* Proposed new Senior School off Stirling Corner roundabout
* Proposed new accommodation in Elstree Village
* Proposed possible Schopwick Surgery relocation to Allum Lane
* Proposed new housing off Deacons Hill Road / Barnet Lane
* Proposed new housing and Media Quarter in Shenley and Well End.

**8. Environment Act, Biodiversity Net Gain (BNG) and Sustainability**

The Environment Bill, that became an Act of Parliament on 9/11/21, will improve air and water quality, tackle waste, increase recycling, halt the decline of species, and improve our natural environment. I do not believe HBC have a robust enough policy on climate change, despite having stated they had a Climate Emergency in 2019.

I request that the Climate Emergency be addressed in the DLP. Also, that all new homes and other developments are built with low carbon footprint / sustainable materials, fully insulated and with solar panels.

I feel that HBC might not have the resources and/or expertise to control that aspect of development and that there would be no effective repercussions if developers failed to deliver the BNG only being measured after 30 years.

**My responses to each individual site within the DLP:**

**BE5 Elstree Way Corridor**

I recognise that this is a brownfield site and so agree to development.

My concerns are:

* busy main road
* public transport is currently insufficient.
* shortage of GPs and strain on health and care facilities.

I request the houses be high density, low value, sustainably build, affordable homes. We request proof that this has been considered.

**Within BE5 Civic Car Park**

The civic car park is used by the Leisure complex, the Hotel, Elstree Studios, British Legion and St Teresa’s Church and Parish Centre and staff and councillors. I suggest a multi storey car park be considered along with flats, which is preferable to using Green Belt land.

**HEL388 The Point, Shenley Road, Borehamwood**

We request that should this development go ahead that the building not be above five stories, that the leisure and parking facilities remain, that any build is sympathetic to and provides an enhancement to the Town Centre and the surrounding houses.

**BE6 Horses Field and Woodcock Hill Village Green (WHVG) Beacon Site**

Reasons I challenge all proposed changes to the part of the site on the Village Green:

* The site has been managed since achieving Village Green (VG) status in 2008 by WHVG Committee in accordance with a Management Plan.
* WHVG is a great asset to Borehamwood and widely used by the local community. The wildlife is abundant, and the Beacon and its siting is of historical interest and important to the town.
* Vehicular access onto Furzehill Road will cause major traffic
* Development would cause increased pollution, noise and reduced light
* 250 homes will mean 500 additional cars
* Distance from Train station
* Distance from GP.

I request that WHVG is not moved from its existing location and boundaries. Any building should take place on alternative sites.

**HEL197 Hartfield Avenue / Close**

Reasons I oppose this development:

* land is in the Green Belt so should be protected by NPPF policy.
* This land has local Wildlife Site Status and TPO’s on the trees.
* Development would cause increased pollution, noise and reduced light.
* 75 houses will mean 150 additional cars
* Deacons Hill Road and Barnet Lane are already traffic hotspots.
* The proposed cycle route shows lack of understanding of the area which has steep hills and narrow roads. This is also an issue for those on foot.
* Lack of public transport serving this area.

**HEL288 Proposed Secondary School**

Reasons I oppose this development:

* The schools are planned for development on high value Green Belt land.
* Development would cause increased pollution, noise and reduced light.
* I do not believe there is a demand for a secondary school in this location. Local schools, including Barnet, have additional capacity.
* pupils would have a significant distance to travel to school.
* The location would add to the serious traffic congestion.

I ask that the local need for these new schools be proved and if not required, as we anticipate, they be removed from the plan.

**HEL218 Organ Hall**

Reasons I oppose this development:

* Green Belt land
* It would cause coalescence of settlements with Radlett
* The location would add to the serious traffic congestion.
* Distance from school, station, GP practices and health and care facilities.

**HEL152 Lyndhurst Farm**

I understand that although in the green belt this land does have a footprint of farm buildings and so I would not be opposed to this being used for development.

**Media Quarter**

Reasons I oppose the Media Quarter:

* This is prime Green Belt land
* Strangeways Stables would be lost.
* The ‘Media Quarter’ plan for 650+ extra vehicles during peak hours causing roads to be gridlocked.
* The Media Quarter may create a few local jobs, but the majority of the workforce will be brought in by companies hiring out the studio.
* Such a facility could put the Elstree and BBC studios at risk.
* The demand for such a huge complex has not been proved.

We request that the Media Quarter be taken out of the DLP and be reconsidered in great depth with full public consultation once it is identified this is a viable proposition.

**Elstree Aerodrome**

I support development at Elstree Aerodrome, to enhance and improve future provision at the site, providing adherence to all the proposed safeguards.

I oppose the use of additional Green Belt fields being taken to extend the runway.

**HEL212 Land North of Watford Road / Cecil Horse Sanctuary**

Reasons I oppose the proposed Care / Retirement homes:

* Green Belt land.
* We do not believe there is a demand in Hertsmere for additional high end care home spaces.
* Development here will impact on that a rural setting.
* The Horse Sanctuary is valued by local residents and the future of the horses is unclear.

**HEL274 Land at Edgwarebury, Elstree Hill South**

I have the following concerns regarding homes proposed for this area:

* The site is Green Belt land
* We are concernedthe site is far from the town centre making it isolating for disabled occupants.

**BE1 Shopwick Practice Relocation – Allum Lane Elstree**

Reasons I oppose the proposed relocation of Schopwick surgery to this site:

* Green Belt land.
* No ‘exceptional circumstances’ exist
* Alternative sites have not been made publicly available
* Haven Heath stated in a public meeting that other sites were too expensive and Green Belt land was cheap. This is not a satisfactory reason for relocating onto Green Belt land underground.
* The footprint is large and includes a car park that should be built
* The site is not in Elstree village and is further from its sister site in Bushey.
* The area is prone to flooding
* The site crosses well used public footpaths.
* The doctors and NHS should understand the importance of local green spaces for mental and physical health.
* The site would add to serious traffic congestion
* The site is on a steep hill.
* Public transport is very limited.

I request the relocation of Schopwick Surgery be considered for a brownfield site closer to Elstree Village and that all other sites considered are reviewed to ensure the decision to choose a Green Belt site was not made for financial reasons.

**EMP1 – Land next to old Fisheries**

As landowners had previously promised profits from the development of this land would be used to maintain Aldenham Reservoir I would not oppose its development, if done sympathetically to its surroundings, on the understanding that Aldenham Reservoir could be restored to its former state, with fencing removed and access extended.

**BE3 Cowley Hill**

Reasons I oppose are this development:

* The site is on valuable Green Belt land.
* Destruction of established habitats for local flora and fauna, once taken lost forever.
* The area has many well used public footpaths, views of the countryside and open spaces that are enjoyed by local residents and residents from surrounding areas.
* Coalescence of settlements between Borehamwood and Shenley
* It will cause increased pollution and noise and reduced light.
* There would be a detrimental impact on local infrastructure, already shortage of health facilities in Hertsmere.
* 800 homes will mean 1600 cars and the traffic movement with the proposed shops, workspaces and other community facilities, delivery lorries to shops and schools will have a huge impact on Cowley Hill and Well End Road.
* All the above will need a much greater provision public transport.
* A 2/3 form entry school is not required as there is capacity in schools in Borehamwood.
* We are not clear whether the developer has allowed for the required number of affordable homes in the Plan.

**HEL152 Lyndhurst Farm, Borehamwood**

If this site is developed, I request assurances enhanced pedestrian and cycle routes are provided and new residential development will reflect the previously developed status.

**HEL369 Well End Lodge**

I would not be opposed to this development if the building was proposed on the existing buildings footprint. If the original footprint is to be extended, I would be opposed as:

* Green Belt land
* It would cause coalescence of settlements with Shenley
* The location would add to serious traffic congestion

**HEL601 Green Street**

I support this development.

**HEL 390 Land adjacent to 52 Harris Lane**

Reasons I oppose this site:

* Green Belt land.
* Significant area of natural beauty.
* The site will cause the further sprawl of Shenley
* Local roads would not cope with the additional traffic.
* The area has little public transport.

**R3 Land south of Shenley Road, Radlett**

Reasons I oppose this site:

* Green Belt land
* Disruption to traffic flow and will cause traffic to drive through Shenley village
* Area prone to flooding

**Porters Park Golf Course**

Reasons I oppose this site:

* Green Belt land
* Traffic will be increased
* Risk of flooding