

Policy & Transport Team  
Hertsmere Borough Council  
Civic Offices  
Elstree Way  
Borehamwood  
Herts WD6 1W

BY EMAIL

December 2021

Dear Ross Whear and Mark Silverman,

## **HERTSMERE'S DRAFT LOCAL PLAN REGULATION 18 ENGAGEMENT**

On behalf of Elstree and Borehamwood Green Belt Society (EBGBS) we are writing with our response to the Regulation 18 Draft Local Plan (DLP).

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

EBGBS are concerned that you have not fully engaged with Hertsmere residents on the DLP. The 2018 engagement included meetings, presentations, Q&A's and displays in community venues. Although Covid is a factor we feel that those not able to use the internet or who find the plan too detailed, have missed much of the information sharing.

The consultation document is far too complex and lengthy for most local people to study and respond to in such a short timescale. We asked for the deadline to be extended to 12 weeks, but this did not happen. **We now request responses be considered past 6<sup>th</sup> December until the end of December 2021, should local residents require more time to provide their comments.**

There are a huge number of sites and reports, yet the actual information regarding layout of the proposed developments is minimal e.g. types of housing, infrastructure. This vital missing information is needed to respond effectively to the plan. **We urgently request that this be provided prior to the DLP going to Regulation 19.**

### **2. Green Belt**

EBGBS consider there to be 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.

The National Planning Policy Framework (NPPF) allows councils to limit land allocation where it is designated as protected, including Green Belt. This has not been done and in the HBC led Teams meeting on 16/11/21 HBC confirmed that without changes in government policy, this would not be requested on behalf of Hertsmere residents.

The Green Belt is essential for human health and wellbeing. The increasing invasion of Green Belt land removes the habitat for wildlife and will add to the rapid decline of endangered species which are already under threat. It is more necessary than ever to preserve the green environment. Green spaces soak up carbon dioxide, reducing global warming and so protecting them has a direct and immediate impact on protecting our planet. It also helps keep our air clean and so makes for a healthier environment. In urban areas Green Belt is our most valuable asset and, as recognised by government policy, should be protected at all costs.

The Green Belt should be permanent. This means it cannot be built on! We need you to fight for our Green Belt as we are sure you value it as much as your local residents do. A valuable use of the Green Belt is for farming, as locally grown crops will be vital to reduce our carbon footprint and ensure food is readily available to our local population. The cost of transport and its damage to the environment means locally grown produce is the way forward.

At the examination stage we understand the inspector will have to look at each of the sites that are being 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 are very concerned as to why you are not questioning the use of this land. Your local residents would support its protection.

The pandemic led to people putting a higher value on natural open space and footpaths within walking distance of their homes, meaning it is even more important to protect the remaining Green Belt. People have become more aware of the importance of sustainability and environmentally friendly practices, so these are demanded by our community.

### **3. Housing Numbers**

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

We understand that despite Michael Gove's statements regarding out-of-date housing data, you are required to use these figures as a first base.

**We request you urgently contact Mr Gove and Mr Dowden to ask what they can do on behalf of our 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 is finally accepted / goes to Regulation 19. We request proof this has been done.**

The Housing Secretary has indicated he is preparing to re-look at housing targets after reportedly admitting figures could be out-of-date:

*Mr Gove told the housing, communities, and local government select committee: "We want to be in a position where people accept and welcome new development. In making a calculation about housing need overall, one of the things that I want to do is look at how the numbers are generated in the first place."*

*One of the criticisms that has been made by both campaigners and opposition politicians locally is the housing targets are based on 2014 data from the Office for National Statistics rather than newer data, such as from 2018. They believe newer data will prove housing targets should be lower.*

*Mr Gove added: "Some of the assumptions are probably out of date and some of the ways that those numbers are deployed by a planning inspector can be done in a more sophisticated way."*

For full report in the Daily Telegraph on 9th November 2021 see Appendix 1. Our Green Belt is at risk because of these inaccurate figures.

**We request that you ask that the special formula the government provides for authorities with large swathes of green belt, allowing councils to limit land allocation where it is designated as protected, be used to reduce the housing numbers required of Hertsmere, as insufficient Brown Field sites are available. We request proof this has been done.**

The presumption in favour of sustainable development, NPPF 11, indicates that the 'objectively assessed needs do not need to be met by strategic policy, where protection policy Paras 137 to 151 (including Green Belt) if 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'

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

Businesses and workers have adapted to home working and more business and retail is carried out online rather than face to face, leaving more office and retail space empty and suitable for development. People will also have less need for transport links to London making Hertsmere less attractive as commuter belt.

**We request all empty homes and those unfit for purpose are identified and reviewed to ensure currently empty, planned vacancies or poorly maintained properties do not remain in that state when they could be used as homes or replaced with new housing to enhance our towns and protect our Green Belt. We request proof this has been done.**

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

A further issue with the plan is that the homes planned for are not in line with the needs of the local population. The average salary in Hertsmere is £30,000 putting most of the recent developments well out of the price range of local people who want to remain living and working in Hertsmere. It is usual that developers underprovide 'affordable homes' as they are not as profitable. In addition, the homes are not 'affordable' to low-income families including Key Workers. Many £1m+ houses have been built that are not demanded by the local population and take the footprint of what could have provided many more homes at reasonable prices. 1-to-3-bedroom low-cost homes are needed, not 4+ bedroom £1m+ homes.

Regarding housing density, the CPRE's 2019 report *Double the density, halve the land needed* (see attached Appendix 2), contains examples of higher-density housing built in recent years, many with 100+ houses per hectare (ha), often

attractively brick or timber built. It includes Brook Valley Gardens off Mays Lane in Barnet, which has 84 dwellings per hectare.

That contrasts with Hertsmere's proposed new housing densities. For example, the site north of Barnet Lane would have 250 homes on 12.63ha, i.e. 19.8 dwellings/ha. The site south of Potters Bar would have only 14.2 dwellings/ha, and Bowmans Cross less than 10 dwellings/ha. Building those sites at Brook Valley Gardens density would reduce the amount of Green Belt Hertsmere wants to build over by 80% or more.

**We ask that the plan be reviewed to put the housing needs of the local population at the top of the agenda, plan for these and ensure developers who are willing to provide such housing are used, rather than those using green belt land to make maximum profits. There should be a huge financial penalty on Green Belt land used for non-locally required housing so as to make it unprofitable.**

**We ask that you only work with developers who are committed to follow the policies and these policies are honoured by HBC e.g. in Cowley Hill 16 Luxury homes should have included 6 affordable homes under Hertsmere policy of 40% affordable in any development over 10 homes, but did not. Developers are renowned for reneging on their affordable housing targets on the grounds of low profits etc without being challenged. This reflects the Planning Department not carrying out a fundamental element of their responsibilities. If you do not have the time or personnel to do this, that is something that needs to be addressed. We request proof this has been done.**

**We ask that the densities of housing be reviewed very closely and increased to ensure lower costs housing can be built using the minimum Green Belt land. We request proof this has been done.**

**We ask that you 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 request proof this has been done.**

Central Government has indicated that the value of land to be released from the Green Belt should be capped at an agreed price before a Local Authority indicates they are considering Green Belt release as Green Belt land has been exchanging hands at extremely high prices which means there is no ability to deliver much needed lower priced housing. We believe that the 'Call for Sites' for the Hertsmere Local Plan has exacerbated this problem. Not only are we likely to lose Green Belt land but this can limit the affordable home provision in the Borough.

It is good practice when considering Green Belt release that the Council, landowners, and developers agree a sensible sale price for any land be released as this ensures that more affordable housing can be built. The emerging Local Plan appears to be creating a free for all with landowners who are happy to give up land for development but only at inflated values which then makes it uneconomical to build the type of houses required. EGBS 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. Empty and second houses should be taxed.

**We ask that Hertsmere stop using this approach. Developers should not be the ones in the driving seat. Green Belt land should only be allowed to be sold to a developer if that developer is to provide pre-agreed housing in line with HBC requirements to house local people, which should be high density, low cost 1–3-bedroom homes. We request proof this has been done.**

**We ask that developers are not the leaders, but the Planning Department take the lead on behalf of the local community and its residents. No more expensive flats or multi-million-pound mansions to encourage new people into Hertsmere, further inflating prices. This ONLY benefits the developers. We request proof this has been done.**

### **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.

**We urgently request HBC draw up and publicise an updated Brownfield register, taking account of all newly vacated, empty, unused, derelict and potentially available sites, prior to the plan moving to Regulation 19. We request proof this has been done.**

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

EBGBS believe the need for additional school spaces within Hertsmere does not exist. There is nothing in the DLP to show what evidence Hertfordshire County Council provided to demonstrate the need. We believe the decision to allocate Green Belt land to build a secondary school south of Barnet Lane and a 2/3 Form Entry primary school at Cowley Hill are based on figures which are being challenged. Within Hertsmere Primary schools have reduced their entries due to falling pupil numbers and Barnet have capacity in their senior school to take more pupils in the coming years, as they will otherwise be under capacity.

We would like proof of the need for additional Care facilities in the Hertsmere area.

**We 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. We request proof this has been done.**

### **7. Traffic**

EBGBS have produced a Traffic Review (see attached Appendix 3) which shows that 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 Furzehill 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

- Furzehill Road at the station roundabout end
- Shenley Road along the whole length from the station to Elstree Film Academy

These hot spots will affect:

- 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.

Many roads are small Roman roads or narrow country lanes. With the M25 and A1 so close, road use is popular, and every additional development will cause increased pressure.

WHVG have commissioned an independent traffic survey for the area of Barnet Lane to the Elstree crossroads and Furzehill Road to Stirling Corner - see Appendix 4. This survey supports the major concerns that the existing infrastructure cannot support an increase in traffic.

**We ask that you consider the EGBS traffic review, which is based on average existing traffic, plus the independent traffic review, consider how much worse this will be with so much additional development, and recognise the infrastructure cannot take the increased traffic the planned developments will inevitably bring. We request proof this has been done.**

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

The Environment Bill received Royal Assent on 9 November 2021, meaning it is now an Act of Parliament. We understand this legislation will improve air and water quality, tackle waste, increase recycling, halt the decline of species, and improve our natural environment.

Mandatory biodiversity net gain as set out in the Environment Act is likely to become law in 2023. The Act sets out the following key components to mandatory BNG:

- Minimum 10% gain required calculated using Biodiversity Metric & approval of net gain plan
- Habitat secured for at least 30 years via obligations/ conservation covenant
- Habitat can be delivered on-site, off-site or via statutory biodiversity credits
- There will be a national register for net gain delivery sites
- The mitigation hierarchy still applies of avoidance, mitigation and compensation for biodiversity loss
- Will also apply to Nationally Significant Infrastructure Projects (NSIPs)
- Does not change existing legal environmental and wildlife protections

The Environment Act will strengthen the biodiversity duty and as such environmental principles should be embedded in domestic policy making. The DLP appears to take no account of these new provisions especially in respect of Biodiversity Net Gain, which must surely only be achievable by limiting the amount of Green Belt sacrificed for development, and even when allowing building on Green Belt, mandating that any such development can clearly indicate a clear net gain in biodiversity.

EBGBS does not believe HBC have a robust enough policy on climate change. In 2019 HBC stated they had a Climate Emergency. This recognition needs to be addressed.

EBGBS do not believe HBC have fully investigated the technology that exists to lower the carbon footprint for new build and have not made provision for this to be used in all future building in Hertsmere, including the requirement for solar panels on all new builds. Sustainable homes are being built across Europe. Hertsmere should lead the way in ensuring the technology and materials available are used to make Hertsmere a sustainable borough, not just in name but in reality.

EBGBS 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.

**We request that the DLP be reviewed to bring it in line with this new legislation that EBGBS fully support. The DLP should have the environment, nature and biodiversity at its heart, along with the needs of its own community. Both can be achieved by a well thought through plan with social and environmental need as a main focus. We request proof this has been done.**

**We 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. This will be more expensive in the short term but with greater density and smaller properties the homes needed can be built knowing HBC have been sustainable and care for the long-term health of the planet. We request proof that this has been done.**

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

### **BE5 Elstree Way Corridor**

EBGBS recognise that this is a brownfield site and so do not oppose the development.

It is noted that in 2018 Consultation the proposal was for 585 homes. This has increased by 100 so is there a presumption that this will be achieved with higher density housing. We would be less happy with a breach/change of the original policy with regards to the height of the buildings. We ask that the homes be in line with local needs and include at least 40% affordable homes or preferably 100% affordable homes for social housing, low income and key workers.

Our concerns are:

- Little space left for road improvements and public transport is currently insufficient.
- Shortage of GPs and strain on health and care facilities.

Continuing improvements at Meadow Park and proposals for improvement at Maxwell Park are welcomed.

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

### **Within BE5 Civic Car Park**

EBGBS are concerned about the use of this car park to provide 70 + 230 homes. The civic car park is used by the Leisure complex, the Hotel, events at Elstree Studios, events at the British Legion and events and services at St Teresa's Church and Parish Centre and for staff and councillor parking for the Council offices. Its loss would be to the detriment of the town.

A multi storey car park could be a solution to this, alongside new high-density housing. ENGNS would find this preferable to building on Green Belt land.

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

The present site houses a well-used Gym, Cinema and Bingo Hall, it provides car parking for the shopping centre, the Station and events at 96 Shenley Road and All Saints Church. A guarantee is needed that a cinema will be built to ensure that the Hollywood of the UK has that facility.

If high rise flats were proposed, this would impact negatively on the residential area to south Furzehill Rd and cause shadows to fall on those homes. The visual impact of the Tower Block/s would blight the Town Centre, dwarf the Church and the buildings in Shenley Rd significantly altering the look of the Town Centre.

**We would support this Brownfield development if the buildings are not be above four/five storeys, 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. We request proof this has been done.**

### **BE6 Horses Field and Woodcock Hill Village Green Beacon Site**

The part of the site that is in the Woodcock Hill Village Green (WHVG) is just that – a Village Green. Part of the BE6 site proposed for housing by Barratt/David Wilson Homes has had Local Wildlife Site Status since 2002 and tree preservation orders (TPO's) on the trees. All of the present Village Green have local Wildlife Site Status and TPO's and also has Local Wildlife Trust Status since 2002. We 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. The first plan was written by Herts Countryside Management Services who set up monthly working parties to involve the community. HCMS staff worked with community groups such as the local churches, synagogues, cubs, scouts and explorer groups and young offenders. HCMS provided tools & first aid training and Public Liability Insurance.

When services were reduced at HCC a new volunteer project manager came forward. Since then a review of the Management In has taken place and this has led to HBC acknowledging that this is a well-kept site with good signage.

WHVG committee have raised funds for tools and equipment, improvements, Interpretation Boards, railway sleeper benches, signage, notice boards, a Beacon and Public Liability Insurance. 200 households have membership of WHVG. Funds are raised from membership, fundraising events, grants and donations.



WHVG is a great asset to Borehamwood and widely used by the local community. 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 problems as the surrounding road network is already in a state of gridlock in the morning rush hour, afternoon school run and evening rush hour. This is further exacerbated when the A1 is closed for any reason. Barnet Lane is a major east west route connecting to Elstree and A585 to Bushey and to Stanmore and West London.

Other reasons ENGNS oppose this site:

- Pollution, noise, light and air quality will be greatly impacted by more development
- 250 homes will mean 500 additional cars and the traffic movement on to roads that are already past capacity
- Distance from Train station
- Distance from GP practices, shortage of GPs in the Town
- Impact on health and care facilities

**Any building should take place on alternative sites. We request proof that HBC support the protection of WHVG in its entirety, as it currently stands.**

#### **HEL197 Hartfield Avenue / Close**

Reasons EGBS oppose this site:

- Land is in the Green Belt so should be protected by NPPF policy.
- Land has local Wildlife Site Status and TPO's on the trees.
- Development would cause increased pollution, noise and reduced light.
- Roads will be significantly impacted with 75 houses leading to 150 cars with traffic entering and exiting roads that are already past capacity. Deacons Hill Road and Barnet Lane are at almost standstill, with traffic backed up every weekday at rush hour. This extra traffic would have a huge impact on the traffic in this hotspot. It is not shown in the DLP where access to the site would be but the obvious choice would be Hartfield Close, onto Hartfield Ave, onto Deacons Hill Road.
- 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.
- There a lack of public transport serving this area.

**We request that these homes not be built as it would use protected Green Belt land, increase pollution in the area and cause congestion on already congested roads. We request you consider the traffic implications of this site.**

#### **HEL288 Proposed Secondary School**

To be located between the Caravan Park and Scratchwood, south of Barnet Lane. HCC already have the figures of movement of pupils from Elstree Village and Elstree and where they attend schools. A significant number of young families send their children to a local faith school.

Reasons EGBS oppose this development:

- The schools are planned for development on high value Green Belt land
- Increase in air, noise and light pollution

- EBGBS do not believe there is a demand for a secondary school in this location. School spaces within Borehamwood and Elstree, and Barnet have capacity in their senior schools to take more pupils in the coming years, which will otherwise be under capacity.
- the location on the edge of Town means that many pupils would have a significant distance to travel to school.
- This area also suffers from slow traffic during morning and evening rush hour and during the afternoon school run. Such a school would take 2,000 pupils and at least 500 staff, whose travel would cause these gridlocked roads to become even more impassable. There would also be disruption while the school is being built. Barnet Lane is already used as a cut through for HGVs and on the east west route to Bushey and through Elstree Village to Stanmore and A414.
- Recruitment and retention could be a problem for teaching staff who can get a very attractive salary enhancement by working in Barnet and other London Boroughs, whereas Hertsmere do not pay London weighting.

**We ask that the local need for these new schools be proved and if not required, as we anticipate, they be removed from the plan. We request proof this has been done.**

### **HEL218 Organ Hall**

Reasons EBGBS oppose this development:

- It is in the green belt therefore causes a destruction of habitats which are irreplaceable
- It would cause coalescence of settlements with Radlett
- Theobald Street is a busy road with traffic chaos at morning and evening rush hour and school run in the afternoon.
- Distance from school, station, GP practices and health and care facilities, Town Centre and Shopping Park Leisure Centre at the Venue all make this an unsuitable site.

### **HEL152 Lyndhurst Farm, Borehamwood**

Provision of a link to footpath O53 is mentioned and a contribution to enhanced pedestrian and cycle routes on Green Street/Cowley. Assurances are required that this will happen.

New residential development is promised to reflect the previously developed status of part of the site providing an opportunity to remove unsightly non-conforming uses in the Green Belt. Assurances are required that this will be the case.

### **Media Quarter**

Reasons EBGBS oppose the Media Quarter:

- This is prime Green Belt land with beautiful views and walks, prized by the local community and those of surrounding communities such as Barnet residents.
- the DLP gives the impression that the proposals are a forgone conclusion which is concerning.
- Strangeways Stables, home to 200 horses, the biggest stables serving Hertfordshire and North London, would be lost.

- Borehamwood's only surviving country pub, The Mops and Brooms would be surrounded by the studio complex.
- The traffic impact of Sky Studios is not yet known. The 'Media Quarter' plan for 650+ extra vehicles during peak hours causing roads to be gridlocked, making life impossible for local residents and those accessing the new studios.
- The Media Quarter may create a few local jobs but the majority of the workforce will be brought in by the teams 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, particularly with so many similar developments being planned around the country. If the Conservative Government are committed to Levelling Up such a complex may be planned for the midlands and north.

**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. We request proof that the demand can be proved without reasonable doubt and that our request has been considered.**

#### **Elstree Aerodrome**

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

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

**We request that you reconsider this plan to ensure that the extended runway does not use green belt land previously unbuilt on. We request proof this has been done.**

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

Reasons EBGBS oppose the proposed Independent Living Proposal:

- The site is Green Belt land.
- The site is far from the town centre so no suitable.
- We do not believe there is a demand in Hertsmere for additional care home spaces.
- If the site is for high end retirement accommodation, this would not be required by local residents.
- 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.

**We request that HBC prove the need for this type of accommodation, then prove there are no alternative sites. It will be larger than 90 units as this is an Independent Living Complex usually achieved by apartments for sale and facilities to support the residents. This would not address the identified needs of the local community as it is far too expensive. We request proof that this has been done.**

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

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

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

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

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

- The site is Green Belt land.
- There are no 'exceptional circumstances' for such a site – no other doctors surgery needs Green Belt land.
- Alternative sites have not been made publicly available.
- At the meeting with Schopwick patients, doctors, and Haven Heath in 2020, HH stated that other sites were too expensive and Green Belt land was cheap. This is not a satisfactory reason for relocating onto Green Belt land.
- The plans on Schopwick Surgery's website regarding its relocation onto the site indicate the building of a whole new health care centre, not just the relocation of the surgery. Parking, except for emergency vehicles, should all be underground to reduce the footprint to a minimum. Space for 40 cars is a huge impact on Green Belt for no additional gain, except for the surgery to save money.
- The site is not in Elstree village and is further from its sister site in Bushey. The relocation of Schopwick Surgery will have an impact on Elstree Village, footfall to the local parade of shops would decrease and make it difficult for local people to walk to the surgery up the steep hill of Allum Lane.
- A more suitable location would have been the site next to the old Fisheries pub.
- The area is prone to flooding during winter months which causes major issues with traffic using Allum Lane. The flooding issues would be exacerbated causing a danger to the homes of those living close to the site.
- The site crosses well used public footpaths.
- The doctors and NHS should understand the importance of local green spaces for mental and physical health.
- Allum Lane is heavily congested with traffic every day. To increase the flow of traffic, particularly during rush hour would cause huge issues for local residents and difficulty for those attending the surgery. The road is narrow with no opportunity to widen.
- The site is on a steep hill and would be a difficult walk for local people, particularly if they are unwell.
- Public transport is very limited.
- Is a healthcare centre best located next to a major household waste facility?

**We 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. We request proof this has been done.**

### **EMP1 – Land next to old Fisheries**

This land was considered in the 2018 consultation but has not been included in the DLP. The landowners had previously promised that some profits from the development of this land would be used to maintain Aldenham Reservoir. As this Green Belt land is marshy and not used by the public, EBGBS 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.

**We request you reconsider this site for the DLP, considering the value of the Reservoir. We request proof this has been done.**

### **BE3 Cowley Hil**

*This is Shenley Parish, not in Borehamwood so why has it been included in the Town figures. If the proposal were allowed to go ahead the infrastructure of Borehamwood would be strained even further but local taxes would be paid to Shenley Parish council.*

This is an area of valuable Green Belt land. 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'. EBGBS agree with this conclusion.

Reasons EBGBS oppose 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, work spaces 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**

*This is Shenley Parish, not in Borehamwood so why has it been included in the Town figures. If the proposal were allowed to go ahead the infrastructure of Borehamwood would be strained even further but local taxes would be paid to Shenley Parish council.*

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

### **HEL369 Well End Lodge**

*This is Shenley Parish, not in Borehamwood so why has it been included in the Town figures. If the proposal were allowed to go ahead the infrastructure of Borehamwood would be strained even further but local taxes would be paid to Shenley Parish council.*

EBGBS would not be opposed to this development if the building was proposed on the existing buildings footprint, assuming the existing pond is retained and improved.

If the original footprint is to be extended, we would be opposed to this expansion as:

- It is in the green belt therefore destruction of habitats which are irreplaceable
- It would cause coalescence of settlements with Shenley
- Well End Rd is a busy road with traffic chaos at morning and evening rush hour and school run in the afternoon.

### **HEL601, Green Street, Borehamwood.**

*This is Shenley Parish, not in Borehamwood so why has it been included in the Town figures. If the proposal were allowed to go ahead the infrastructure of Borehamwood would be strained even further but local taxes would be paid to Shenley Parish council.*

We require assurances that existing trees and hedgerows will be retained and enhanced for ecology and visual gain.

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

Reasons EBGBS oppose this site:

- This is 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 EBGBS oppose this development:

- The site is on Green Belt land
- Disruption to traffic flow and will cause traffic to drive through Shenley village
- Area prone to flooding

In addition, we have been advised that the land could more usefully facilitate any required future expansion of Newberries Primary School to 3 forms entry or any required further relocation of the Red House Surgery should an alternative site in the centre of Radlett not be identified.

### **Porters Park Golf Course**

Reasons EBGBS oppose this site:

- This is a Green Belt site
- Traffic will be increased
- Risk of flooding

## **Appendices**

Appendix 1 - Daily Telegraph – Michael Gove Housing numbers

Appendix 2 - Housing Densities

Appendix 3 - EBGBS Traffic Review

Yours sincerely,

Ann Goddard (Chair), Helen Stammers (Treasurer), Pat Strack (Membership Secretary), Clive Butchins and Jonathan Supran  
Elstree and Borehamwood Green Belt Society Committee