

# Aldenham Parish Council



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Mr Mark Silverman  
Planning Policy and Transport Manager  
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Civic Offices  
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3 December 2021

Dear Mr Silverman

## **Re: Hertsmere Draft Local Plan - Regulation 18 Engagement response**

### **Summary of key points**

Aldenham Parish Council (APC) believes the existing planning policies of Hertsmere Borough Council (HBC) which define all development on the Green Belt to be inappropriate, should continue to be respected. We object to large areas of Green Belt land being allocated in the way proposed. More thought should be given to using existing brown field land and smaller sites where the impact and spread is less obvious.

The plan should be put on hold until clarification on housing numbers is obtained. HBC needs to fight to protect the Green Belt and not be seen as just complying with central government targets.

Vital infrastructure improvements (such as schools, roads and health centres) are required to service such an enormous increase in housing numbers, which are outside the jurisdiction of HBC. APC needs to know that the road and infrastructure improvements are fully costed and deliverable in an appropriate timescale.

The draft plan has been the subject of much concern by its residents and a large number of individuals have made their own representations to the council.

APC understands the complexities in creating this plan, the amount of effort by officers and borough councillors and the requirements imposed on the borough council by government targets and planning policy, along with the limitations of what the borough council can control and actively implement. APC also appreciates the importance of having an up-to-date plan and the risks of not doing so. However, APC is unable to support key elements of this draft local plan, in particular the number of new homes proposed, and the allocation of huge amounts of Green Belt land for housing and the consequential impact on the borough and wider afield.

As a general note, we believe this stage of the consultation process by HBC has been inadequate. It appears that Covid has been used as an excuse to avoid face to face engagement with the various communities. We as a council have recommenced public meetings as required by government, and we see no reason for the lack of public face to face engagement. Indeed, the point has been made that HBC has sought to hide behind Zoom to avoid challenge. Cllr Harvey Cohen did a Zoom Presentation at APC's request and one face to face meeting at the Radlett and Green Belt Society AGM, but as a whole the public are very disappointed with HBC in its approach.

APC has broken this response down into two sections. Section A is APC's response to the plan as a whole and Section B is its response at a local level covering Aldenham Parish.

## **Section A – The draft local plan as a whole**

Having considered the draft plan and listened to residents and other participants in the process it is clear there are some key fundamental issues that need addressing further and robustly challenged. We see these as follows:

1. The significant loss of Green Belt and why this needs to happen.
2. The appropriateness of current government targets for housing and the basis of the calculation.
3. The impact on the highway network across the borough from all the proposed land allocations once developed, and the inevitable increased congestion, travel times and pollution.
4. The impact on existing infrastructure, and the provision of new infrastructure to accommodate the new developments and households. This includes schools, medical facilities, public transport, fire and police stations and other key facilities.
5. Site identification process.

Expanding on the issues above:

### **1. Loss of Green Belt**

Along with many of our local residents and those of other areas in the borough, we are dismayed at the acres of Green Belt land that is to be taken for new housing, much of which is agricultural or previously undeveloped land not classed as brown field. The rationale and standards required for building and allocating land in the Green Belt are well rehearsed, known by yourselves and repeated by other representations. However, it is worth emphasizing that the metropolitan Green Belt was set up in 1947 essentially to prevent urban sprawl and provide a green lung for the Metropolitan area of London. 93% of the Green Belt is in the adjoining shire counties and they are entrusted with its protection. Hertfordshire is one of those shires. In Hertsmere, approximately 80% of the borough is Green Belt.

The Green Belt is an irreplaceable and valuable asset and should be protected at all costs. The current planning policy in Hertsmere recognises all development in the Green Belt to be inappropriate. This policy should continue to be respected and the draft local plan as presented is a concerted attack on the irreplaceable asset of the Green Belt and should be resisted. The Green Belt has a crucial role to play in separating settlements, which otherwise would result in an urban sprawl of Radlett, Elstree, Bushey, Borehamwood, Shenley and Potters Bar, taking from those areas their unique local character and countryside

atmosphere. If some land is required in the Green Belt, it should be limited to the smaller sites where the impact is spread and less obvious.

The allocation of the sites would appear to be contrary to policy GB1 in the draft plan, as many of these earmarked sites are clearly not in scale or sympathetic to their surroundings, and would adversely impact on the feature character and appearance of the village.

The draft plan refers to Climate Change and Greenhouse Gas Reductions (CC1 and CC2) but the proposals themselves contradict these policies by increasing the need for water and energy consumption and off-setting the carbon in the atmosphere by monetising it.

In his speech on 6 October 2021, The Prime Minister stated that new homes would be built on brownfield sites and not green fields. This is now backed up by the Budget announcement prioritising brownfield redevelopment. We ask HBC to play its part in upholding this pledge, and preserve the Green Belt, and strengthen the policies in the Draft Local Plan to make this a strategic objective. The importance of the Green Belt was understood in the decision of the planning committee in the rejection of the huge solar plant proposals for Radlett and Elstree, and needs to be shown in fighting against the housing targets being imposed by Central Government.

APC has heard arguments by HBC that you have no choice due to the housing targets and the high proportion of Green Belt in the borough, but while APC understands the position it does not appear that HBC is taking a robust approach over this issue. NPPF part 11b footnote 7 clearly gives the opportunity for the housing targets to not be met by the Green Belt. While it may be that some councils in the past have not been successful in reducing imposed housing targets in the Green Belt, this seems a weak reason for not challenging the current housing allocations. The housing quota should be challenged robustly. The impression of residents is that HBC is insufficiently concerned by the loss of Green Belt. APC does not believe that the current leadership of HBC wants to be remembered as the ones who were responsible for the wholesale loss of Green Belt in Hertsmere.

## **2. Housing Need**

APC believes that the calculations for housing need from central government are flawed. Basing the figures on 2014 data when much more recent data showing lower levels of population growth and need are available, is wrong. While the government guidance is based on 2014 as a base year, it seems perverse to turn Green Belt into developed land based on the out-of-date data. This should be actively challenged. HBC acknowledged earlier in the plan process that if 2016 household projections were used the annual housing requirement would be considerably reduced. Later data points towards even fewer new homes being required.

The council recognises the need for sympathetic and proportionate development to provide for national housing needs, in particular affordable housing, but the plan as presented meets neither of these objectives. Moreover, the Secretary of State Michael Gove MP's most recent comments to the select committee indicated that the calculation of national housing numbers may need to be revisited and that communities should be given a greater say over new development and the impact of permitted development. APC is hopeful that the communications HBC has had with government, and the concerns expressed by Oliver Dowden MP to the Secretary of State Michael Gove MP, will assist in ensuring that common sense prevails, and that the land allocations are changed.

### 3. Highways

As proposed, the draft local plan will have a significant impact on the highway network and this has been recognised by HBC through the process so far. Travel times and congestion will increase for all and the risk of road accidents will increase. The draft local plan includes appropriate words about sustainable traffic initiatives, cycle lanes and trying to discourage people from needing to travel far. However, we all understand the ability of Hertsmere to control any of this is limited as County Council and Highways England are responsible.

HBC in the early stages of the process made reference to the 2018 Hertfordshire County Council (HCC) Transport and Data Report highlighting significant data in relation to the borough. This included the following:

- The borough includes 7 of the 25 most heavily trafficked routes in Hertfordshire.
- Hertfordshire's main towns suffer with congested junctions. Frequent link queuing also occurs on many A roads.
- Serious link congestion along the A1(M), the M25 and the M1.
- Traffic levels within the borough are expected to increase by 5.7% between 2017 and 2021 and by 16% between 2017 and 2031.

This data is three years out of date, and significantly, is a forecast which does not take account of the additional new business developments and over 12,000 homes proposed by the draft plan.

HBC may well have or be setting up strategic liaison groups with HCC to address transport issues and the delivery of improvements but HBC's only real tool is through the planning process and the granting of planning consents. The draft plan does not appear adequately to address the issue of the impact on the road network if all allocated schemes are implemented and in particular vehicles increasingly using routes along inappropriate country lanes and densely populated residential streets.

It seems illogical that the body that makes strategic land allocation decisions in its plan cannot implement the strategic travel requirements/improvements prior to development taking place.

If this draft plan were to be adopted, sites may come forward on an individual basis with all the usual consultant reports to support the relevant scheme as required. However, as we frequently see the highway consultants' reports usually conclude that the scheme will have little impact and a green travel plan will perhaps offer a token shuttle bus for the larger schemes for a few years. HBC should make sure that Highway consultant reports are addressed to the planning authority with the relevant consultants then having a duty of care to the council for their advice and studies, and not just a duty of care to the landowner.

The council hopes that any new local plan will actively discourage car use on new developments. The current SPG encourages car usage by requiring new developments to provide minimum car parking spaces. The draft local plan does amend these standards for 4 bedroom plus houses but for 3 bedroom and less, which is generally the type of housing that is required (indeed identified in the Radlett Neighbourhood Plan (RNP)) the standards have remained the same. APC would like to see parking restricted to a lower average per home thus reducing dependence on cars.

With the current proposal for Radlett of c1000 homes based on the proposed car parking standards, this will likely lead to an additional 2000 cars on the local roads. Compound this with the other proposed sites and the impact will be huge.

While the issue of householders using cars has a significant impact on road usage, the impact would be further increased due to additional employment sites, and amongst other things, vehicle movements for internet deliveries.

Density zones for the various areas need reviewing particularly for levels of car parking, based on the figure shown in Appendix 2 for Radlett. Radlett does not appear to have a Zone 1 where car parking levels can be reduced and building density can be greater and indeed Zone 2 does not cover areas which are a similar distance from the village centre. This is presumably due to the conservation areas in relation to building density but from a transport point of view if alternative more sustainable modes of travel are to be encouraged, these zones need to be reviewed for car parking standards.

#### **4. Infrastructure**

As mentioned above, the key infrastructure issues required to accommodate the development proposal in the draft plan are not within the control of HBC. The infrastructure needs to be planned and ideally delivered before the significant schemes come forward in this plan. Presumably this can be done by new developments being allowed to commence only once adequate adjustments are in place. For example, it would be unacceptable if the water pressure in existing properties were reduced significantly because major water supply upgrades required through the network had not been completed. While proposed land allocations need to be deliverable to be included in the plan, there should be a restriction that strategic sites cannot commence until HBC/HCC, Highways England and other public bodies are ready to or have implemented schemes to cater for all the new proposed strategic sites planned to come forward. The plan is for 15 years so there is plenty of time to do this.

The plan shows some new land allocations for schools and doctors' surgeries but the provision of secondary education facilities seems limited. From Radlett's perspective there are provisions for new primary school spaces, but the pupils at these schools quickly need secondary schools, which are only to be found in Watford, Bushey or Borehamwood. This in turn would lead to increased travel and congestion at the busy school run periods.

We know that HCC has already insufficient places for children with special needs, and note that there is nothing in the draft plan addressing the current shortfall or need to increase the number of places as a result of the increase in population.

#### **5. Site Identification Process**

APC considers that the site identification process for inclusion in this draft local plan is flawed. The council was required to call for sites and as a consequence of Hertsmere having a significant percentage of Green Belt it has ended up with significant landowners putting forward large areas of Green Belt. Large landowners of commercial property and existing brownfield land are probably less inclined to put their sites forward, particularly where they have existing rental streams or operational businesses and the value enhancement for them is a more time-consuming process to assess. We feel there is still considerable potential on existing brownfield or town centre locations over the plan period, which could help reduce the level of housing need to be satisfied by the Green Belt, based on the current draft local plan

requirements. This should be further explored and rather than just waiting for major landlords to come forward, commercial landlords in desired locations should have been actively engaged by HBC, especially when the impact on the Green Belt is so great.

## **Section B – Radlett and Surrounding Villages**

At a local level, APC strongly believes that Radlett is having too much housing imposed on it, which is neither justified by local need nor capable of being adequately serviced by the current road network and infrastructure. That is not to say we do not accept that Radlett has to accept change and further land needs to be allocated for development. Indeed, this is recognised in the RNP. However, the proposed allocation as a percentage of existing housing is greatest in Radlett at 28% and it is clear that this figure has been allocated purely on the location of a number of large sites being put forward which are in single ownership and where the arbitrage between agricultural values and housing land values is greatest. We comment on the allocated sites below. Within Radlett, we see no reason in particular for the developments proposed on R1 and R3 neither of which meet the needs of the Parish.

### **1. Transport**

The impact on the Parish of Aldenham and its road network will be exacerbated in particular by the additional developments in Shenley and Elstree, partly due to the more comprehensive facilities on offer, the Thameslink train station and also due to it being one of the key routes through to access the M1 and Watford. R3/HEL 231/HEL 214/HEL 220 together with R1 will add c. 27% to existing households without any detailed plans to develop roads and rail station to cope with increased numbers. The draft plan recognises this at pp 194 (impact is considered to be severe). The plan offers warm words only on these and the application of sustainable transport policies.

The road structure in the Parish is not suitable for the proposed housing in Radlett or indeed the resulting traffic levels from land allocations in neighbouring areas. Watling Street is the key route through the village and becomes very congested at peak times. However, all the roads feeding off it and providing access, in particular to the M1, are inadequate. Congestion at the A41 roundabout is often significant leading to long tailbacks towards Radlett and Bushey. Additional vehicles are only going to make this worse without some significant alteration.

Heading to Elstree via Watling Street is a highly congested route in the morning and evening. Aldenham Road which is the bus route out to Park Road/Watford Road is effectively a small residential street and inappropriate for current traffic levels let alone increased traffic levels. The junction of Watling and Park Road is designed such that large vehicles cannot make a left hand turn to head up Park Road/Watford Road. This junction with its mini- roundabout frequently becomes congested with long tails backs and the consequence that traffic including HGVs try to navigate narrow residential roads, which is totally inappropriate and unsafe.

The existing road network is not conducive to cycling and many of the footpaths are narrow and so not appropriate for shared cycling and walking. For example, the bridges leading to Theobald Street and Shenley Hill have very narrow footpaths and increased traffic levels on these routes will increase the danger to pedestrians. While Radlett does have a Thameslink station the carparking is limited and currently fully used by commuters. There is no capacity for the further vehicles who will wish to park. In addition, there are no lifts for those that need them for access.

If people are to be encouraged to use alternative transport methods, bus services will need to be increased, to provide a quick reliable alternative.

## **2. Affordability and Viability Assessment**

Allocating such large areas of Green Belt land in what is probably one of the most expensive areas outside London, will just generate more expensive housing. The affordable housing will be calculated from the high market rates meaning affordable housing being developed at unaffordable levels for many people in the borough. Private housing will only be developed and phased, as all good developers do, to maximise value. We do not accept that increasing land allocation will decrease or stabilise prices, as has been suggested.

Were any of these sites to be included in the final plan, the value of these sites should be secured (by an appropriate mechanism in all assessments for affordable housing and s106 contributions), at, for example 2021 agricultural value. Post allocation of housing land, the sites will presumably be sold to house builders for delivery and it is important that this base value is maintained despite what the house builders may pay.

The view that developing large high value Green Belt sites will generate significant revenue for offsite infrastructure is unlikely to be significant due to the cost of providing basic infrastructure or upgrading existing utilities such as gas/water/sewage on those sites.

## **3. Education**

APC would ask the planners to reconsider including a secondary school closer to Radlett/Shenley rather than housing. Many children travel long distances to attend state schools. Were high quality state education available in or closer to Radlett, we think many parents, including those currently choosing private education due to lack of suitable state alternatives close by, would opt for it. This may be a more justifiable use of some of the strategic sites.

## **4. Radlett Neighbourhood Plan**

APC would also ask that the draft local plan takes this opportunity to reflect the RNP and put in place stronger policies for delivery of key aspirations. The objectives of the RNP were shaped by what was learnt from engaging with residents and businesses, and from analysis of facts, figures and trends. These are

- To protect and enhance the verdant character of Radlett (Objective 1)
- To meet new housing demand in a manner that is sensitive to the character of the village, having regard to context and the Radlett Character Assessment 2016 (Objective 2);
- To support the development and/or retention of smaller homes available to younger people and older downsizers (Objective 3);
- To promote the protection and positive use of the surrounding Green Belt by providing more opportunity to access it by foot, horseback and bicycle (Objective 4);
- To protect open spaces in the village from development and to ensure that all residents have access to community open spaces for leisure and recreational purposes within a reasonable walking distance (Objective 5);

- To maintain a modern and vibrant high street, by promoting a diverse range of retail uses and supporting smart technology throughout Radlett's village centre enabling a more connected and mobile community and improving ease of access to local products and services; (Objective 6)
- To promote an active community within the village, with improved community and cultural facilities for residents and visitors (Objective 7);
- To encourage and facilitate the development of buildings and sites in the village in order to improve the vitality of the high street and provide better facilities and amenities for the community and visitors (Objective 8)
- To encourage cycling to and from key local destinations by improving the facilities for safe cycling and adequate parking (dedicated and safe paths, lanes and tracks) within and outside Radlett (Objective 9)
- To require development and public realm improvements to make a positive contribution to the natural, built and historic environment (Objective 10);
- To support proposals improving access, capacity, appearance and functioning of parking facilities for cars, bicycles and motorbikes; (Objective 11);
- To seek improvements to streets and transport infrastructure facilitating a smooth traffic flow through the village and district centre (Objective 12);
- To ensure Aldenham Parish Council and the local community have a meaningful opportunity to engage with developers and their design teams in the early stages of designing proposals for major sites, including the key locations for development as identified in HBC's planning brief for Radlett District Centre and other significant development (Objective 13).

## 5. Draft Site Allocations

Commentary on larger sites in or close to the Parish is made below, although there are a further 90 properties planned in various Aldenham Parish Villages:

R1 - Land North of Watford Road - 350 homes  
 R3 - Land South East of Shenley Hill -195 homes  
 HEL220 - Porters Park Golf Club, Radlett - 40 homes  
 HEL214 - Land South of Theobald Street, Radlett - 75 homes  
 HEL222 - Cobden Hill, Radlett - 10 homes  
 HEL231 - Starveacres, 16 Watford Road, Radlett - 90 homes  
 HEL345 – Aldenham Glebe  
 Elstree Aerodrome-Special Policy E5  
 Gypsy and Traveller Provision

### **R1 - Land North of Watford Road - 350 homes**

This site is arable farmland and the land should in our view continue to be used for farming. The suggested compensatory measures if this is developed cannot compensate for the loss of this farmland in the Green Belt.

It is a significant site which does not form a natural extension of the existing settlement, unlike others and sits more as a stand-alone site. This has presumably been chosen based purely on quantity of housing possible and the advantage of it being in single ownership.

This site forms part of the RNP area, which has as an objective listed above, to promote the protection and positive use of the surrounding Green Belt. Allocating this for housing is in complete contradiction of the RNP (which will run for a similar period as the new local plan),

and was passed by a referendum and only recently adopted. If this site continues to be allocated, we would ask that the proposed housing reflects the identified need for smaller dwellings.

We would also ask that any new school on the site is joined with Fairfield School opposite. APC believes that it makes no sense to have two primary schools on opposite sides of the road with doubling of some overheads (paid by the taxpayer) when a new large school could be built on R1 and the existing school site used for housing similar to that already surrounding it. We would not support the provision of a new primary school in addition to Fairfield School. The forecasted shortfall in qualified teachers predicted over the next decade will make it difficult to sustain. One of many reports produced last year can be found at <https://epi.org.uk/publications-and-research/teacher-shortages-in-england-analysis-and-pay-options/>.

The suggestion that occupants of the site will walk, cycle or use other modes other than car, to access Radlett and the train station is unrealistic as the plan is drafted. High numbers of people do not walk these or shorter distances now when cars (electric or otherwise are available), and this is highly unlikely to change. The walk back from Radlett is uphill much of the way and a round trip on foot would take many people more than an hour. Even without parking in Radlett commuters will be dropped by car as happens now. The local facilities suggested on the site proposal would need to be significant to deter this.

New Road leading to Battlers Farm would no doubt become busier and more dangerous. Cars already cannot pass easily when a bus comes along and the road narrows to effectively one lane at the top of Loom Lane with a blind corner.

### **R3 - Land South East of Shenley Hill -195 homes**

This site is a designated site of geological interest and a designated wildlife site. It is also a designated RIG (puddingstone). It adjoins Theobald Street local wildlife site.

Again, the impact of this site on traffic will be significant both by occupants and visitors. The proposal to feed onto Radlett Lane at a tight corner needs to be properly thought out and Shenley Hill has already been identified as lacking safe crossings areas, with attempts by councillors to have a new pedestrian crossing being unsuccessful. Further traffic will only exacerbate this and will undoubtedly lead to more drivers cutting through the adjoining residential streets.

As for R1, this site forms part of the RNP area, which has as an objective listed above, to promote the protection and positive use of the surrounding Green Belt. Allocating this for housing is in complete contradiction of the RNP (which will run for a similar period as the new local plan), and was passed by a referendum and only recently adopted.

If this site remains to be allocated, the proposed housing should reflect the identified need for smaller dwellings and as for all new housing should meet the design aspirations of the RNP.

Providing for an expansion of Newberries School makes more sense than the suggestion for the primary school for R1, although the extra children will soon need secondary places closer to hand.

The proposal to move or provide a site for a new GP is not realistic. The current location in Radlett is accessible from both sides of the village and siting it away from the village centre

will just encourage more vehicle journeys across Watling Street. It is also less accessible to many of those that need it most. We understand from the presentation from HBC that it has been included in case a site in the village centre cannot be found.

Like R1, the thought that many people will walk from this site along Radlett Lane is again fanciful due to the distance and the fact that Shenley Hill is very steep. If this site does remain a better access solution would be required.

### **HEL220 - Porters Park Golf Club, Radlett - 40 homes**

This site is very close to R3 and if both these sites were allocated the points raised above will be compounded.

### **HEL214 - Land South of Theobald Street, Radlett - 75 homes**

Similar issues to R3 in terms of transport and pedestrian routes although closer to the village centre. However, development of this site, along with Organ Hall Farm and R3, is making the merger of Borehamwood greater and encouraging urban sprawl, which is a key reason for the Green Belt.

If this site remains it should comply with the RNP in terms of preferred housing and design aspirations and would be a better location for older persons' accommodation/bungalows due to there being a more level route on foot to Radlett.

### **HEL222 - Cobden Hill, Radlett - 10 homes**

APC has objected to proposals for this site previously although compared to the others it is more acceptable provided the right design concept is adopted.

### **HEL231 - Starveacres, 16 Watford Road, Radlett – 90 homes**

This site is supported and indeed identified in the RNP, which states 'Residential development at Starveacres will be supported where it provides for a mix of housing types and tenures. Proposals should consider opportunities to provide housing suitable for older people'. APC is unable to agree to the proposed number until there is further information relating to the mix of housing types proposed.

### **HEL345 - Aldenham Glebe**

There is wide-spread dismay locally that this site has been put forward by the St Albans Diocese. If adopted, this allocation will result in the loss of three long-established businesses and with it the services they provide to the local community. The two garden centres and mower repair shop have continued in business in spite of the pandemic because they are local businesses meeting local needs and consideration should be given to reducing the scale of this proposed development to enable these businesses to continue. There are also concerns over the planned access route onto Aldenham Road which is a very busy road and already heavily congested at peak travel times as traffic cuts across from the A1/A41 and

Watling Street. We would prefer to see this site allocated for rural business use rather than housing.

### **Elstree Aerodrome – Special Policy E5**

APC is concerned that a further 10 acres of Green Belt land have been added to the area covered by this policy. We do not believe that this land has ever been used by the aerodrome. The fields are separated by fences and hedges. As the aerodrome has Permitted Development Rights it effectively does not need planning permission for airport related activities.

The land in question consists of two fields amounting to about 10 acres, owned by the Aldenham Estate, who also own the aerodrome. Aldenham Estate has shown its complete disregard for the Green Belt through its proposal to develop an enormous solar plant on Green Belt land.

While APC fully supports the Aerodrome, we do not support giving it the ability to develop a sizeable piece of land in the Green Belt, without appropriate planning consent and justification. A smaller allocation may be more appropriate to allow some operational flexibility.

### **Gypsy and Traveller Provision**

Provision for Gypsies and Travellers has caused concern about the need for additional provision given the number of existing mobile home sites in the area. Is this growth of the existing population or will it encourage others to move to the area?

### **Aldenham Reservoir**

Aldenham Reservoir should be included in the local plan. At the recent Radlett Society and Green Belt Association meeting Cllr Harvey Cohen said that ‘he was committed to do all that he can to facilitate the reopening of the Reservoir and return this asset to its former glory’. The battle over the loss of this community asset used by people far and wide for over 70 years has been contentious. Endless campaigning and negotiations have taken place and in order to secure a satisfactory outcome for all parties, a clear commitment and vision needs to be incorporated into the local plan.

## Conclusion

APC commented at the beginning of this response that it understands the need to have a new local plan and the pressures HBC is under to do this. However, APC believes the plan should now be put on hold until clarification on housing numbers is obtained and a proper challenge is made to the use of such large amounts of Green Belt land. This would not be an unreasonable approach with the comments made by key central Government figures including our own MP Oliver Dowden and would limit wasting time and expenditure on plan preparation.

APC objects to large areas of Green Belt land being allocated in the way proposed and much more thought and consideration needs to be given to using existing brown field land. The call for sites in the borough has inevitably resulted in large amounts of single ownership Green Belt land being proposed.

HBC needs to fight to protect the Green Belt and not be seen as just complying with central government targets. The provisions of the NPPF should be used to challenge these allocations.

Whichever site allocations are made then APC believes that the key strategic sites in particular, should not be allocated until considerably more detailed work is undertaken. APC would like to see the sites master planned and the impact on infrastructure borough wide and locally properly assessed. Importantly, APC needs to know that the road and infrastructure improvements are fully costed and deliverable in an appropriate timescale. This work should happen before the plan goes to the next stage (regulation 19).

APC looks forward to hearing how HBC decides to proceed and the changes it makes to the Draft Local Plan.

Yours Sincerely



Peter Evans  
Council Manager on behalf of  
Aldenham Parish Council