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Dear Sirs,

London Colney response to Hertsmere Engagement in relation to its local plan

Introduction

London Colney Parish Council welcomes the fact that Hertsmere has distributed copies of its latest Local Plan newsletter (no. 3) in the parish of London Colney. Unlike the previous “Issues and Options” consultation, which did not formally engage with residents in this area, there now appears to be a greater willingness at the political level in Hertsmere to acknowledge the fact that the proposed Garden Village (site H2) would have significant impacts on this parish, and that engagement and consultation with the parish on this proposal is therefore both appropriate and necessary.

For its part, London Colney Parish Council both encouraged its residents to attend the nearest public exhibition of the Hertsmere plans (at Shenley Primary School) and arranged its own evening meeting, attended by some 120+ residents, on 21 November 2018 at the Caledon Centre. A number of concerns over the Garden Village proposals were raised by residents speaking at that meeting, and these partly inform this formal response from the Parish Council to the engagement process at this stage.

Summary comments in relation to proposed site H2 Tyttenhanger Estate (Redwell Garden Village)

Green Belt: Given that London Colney extends up to the boundary between St Albans District and Hertsmere, the importance of the adjacent Green Belt (on both the SADC and HBC side) is particularly important, notably in relation to the Green Belt purposes of safeguarding the countryside from encroachment and, to a lesser degree, checking the unrestricted sprawl of built-up areas. There is also as a potential loss of an amenity which residents of London Colney are currently able to enjoy for leisure purposes, given that that various public rights of way run through the site.

Adverse impact on landscape, views of the countryside, and local environmental amenities, notably Redwell SSSI and Colney Heath Nature Reserve, both of which are immediately adjacent to the site; and also loss of ancient woodland and harm to locally rare wildlife and wildlife habitats.

Roads infrastructure: One of the key concerns is in relation to the pressure on the existing roads infrastructure. Vehicle movements from the proposed site will make extensive use of Coursers Road and have significant adverse impact on the A1081 / Bell roundabout junction, where there are already peak time delays. Also, if the London Colney bypass becomes gridlocked then traffic will divert via London Colney High Street, as the only available alternative.

Public transport: the proposed site has no rail links. The proposed site has a “limited number” of bus routes, currently only operating round the periphery of the site. Fundamentally, as proposed the site is not a sustainable location, since the site is overly reliant on use of the private car. If commuter needs for residents are to be met via Potters Bar station, as is implied by the proposal to provide a fast (non-stopping) route to Potters Bar station, then that suggests those commuter needs would be better served by developing sites such as those detailed in the Hertsmere’s sites documents in 5.1, i.e. PB 1, PB2, PB3 or PB4, all of which are inherently more sustainable if considering the need to access Potters Bar station.

Employment: the proposed employment site (site reference EMP7) is immediately adjacent to the Bell roundabout and J22 of the M25. This location is likely to result in increased local commuting use of the M25, contrary to its purpose (as part of the motorway network) in facilitating long-distance travel. “Limited bus services” run near the site, which suggests that workers will be reliant on the private car, unless living locally to the site. Its location may also promote warehousing over other uses (noting both existing similar facilities adjacent to the A1081, and also the pressure for this use if the Strategic Rail Freight terminal is ultimately developed).

Education: the published document states only “details awaited from HCC”. Until such details are provided it is not possible to offer fully- informed comment on whether education provision would be appropriate to the proposed level of development.

However, London Colney Parish Council is aware of requirements for a primary and secondary school on land which HCC has put forward under the draft St Albans Plan (Broad Location S6 ix), Proposal 9: “Site for and appropriate contributions towards an 8FE secondary and 2 Fe primary ‘all-through’ school, including Early Years provision”), and would be concerned if the secondary school’s catchment area resulted in significant additional vehicle movements from the proposed Hertsmere H2 site through London Colney to the SADC S6 ix) site at peak times.

Health: the published document states only that details are awaited from CCG. Until such details are provided, it is not possible to offer fully- informed comment, but concerns have been raised that any under-provision within the site will increase pressures on existing providers.

It was reported at a recent meeting in Shenley that the local GP practice there is not accepting new registrations, for example, and there are similar concerns in London Colney, where it proved impossible to find a GP practice willing to provide local medical services in the Napsbury development, despite an allocated premises.

Retail infrastructure: there is little detail in the published document, beyond mention of a “village centre” and “other community facilities”. It seems probable that for most shopping other than to provide for immediate daily (primarily food) needs, residents will be reliant on travel to nearby town centres or to edge-of-town facilities such as Colney Fields Shopping Park. Concerns are therefore closely bound up with issues of sustainability of the site, in view of the apparent lack of public transport options and reliance on the private car, as indicated above.

Lack of clarity in documentation: there are concerns over the actual scope of what is being proposed – the “4,000+” of the Hertsmere engagement document is not well-aligned with the developer-side indication of “up to 6,000 homes”. A 50% range in relation to the ultimate scale of development has significant impacts in terms of infrastructure demands and pressures.

Supplementary points:

Green Belt

The approach to the Green Belt and its importance is framed by the NPPF, para. 133: “*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.*”

London Colney Parish Council believes that this quality of openness is seriously compromised under the proposal for developing the site H2.

Hertsmere’s own Green Belt assessment (Stage 1) comments that:

“The Stage 1 Green Belt assessment identified much of the wider area within which the site [H2] is located as scoring strongly against purpose 3 (safeguarding the countryside from encroachment), as the site is in a rural location with the majority of the site being agricultural land and woodland.”

We are unclear why the Stage 2 assessment appears to move away from that assessment in stating that “*parts of the proposed Garden Village site meet the Green Belt purposes to a varying extent. It concludes that if released in its entirety the site would harm the wider strategic Green Belt. The Assessment however identifies that there would be more limited harm to the wider Green Belt if a smaller part of the area south of Coursers Road were to be released, due to the presence of strongly defined boundaries, its visual containment, and separation between this area and surrounding settlements.*”

The separation between the proposed site and London Colney is, essentially, the Bell Roundabout and A1081. We do not agree that “separation” between settlements achieved solely by roads, as built structures, is effective separation; and we further note that that St Albans District Council is proposing a reclassification of London Colney as a town, reflecting its growing size and the fact that its development footprint has already extended significantly under previous rounds of expansion. This is a further argument against additional “sprawl”, as defined under Green Belt purpose 1 (NPPF para 134 a.).

There are also a number of effective constraints if looking to develop this site. Almost all the site suffers from night time noise above World Health Organization (WHO) recommended levels, and the edge along the M25 is very considerably above WHO recommended levels. The in-vessel composting plant and anaerobic digester plant within the site have demonstrated problems with foul odours from the processes which have been the subject of resident complaints and petitions in the past. Both motorway and waste plants would require a ‘cordon sanitaire’ of significant size to mitigate against these problems (and even then, the noise issue in particular is still likely to be adversely noticeable). Further areas would need to be designated as protection to the Redwell Wood SSSI and in order to avoid construction beneath high-voltage power lines (with some restrictions on the height of items for safety reasons, and additional impact on design of layout to minimise the visual impact).

Adverse environmental impact

As noted above, there would be significant impact on openness if the site at H2 were developed. Moreover, proposed site is subject to various public rights of way running through the site. At present, these are enjoyed by London Colney residents as countryside walks in the nearby area; even if the rights of way are maintained, the changed use of the land would diminish their value in promoting physical and mental health and wellbeing through exercise.

With regard to individual sites, London Colney Parish Council is concerned that the proposal would endanger the colonies of tree sparrows in the Tyttenhanger Farm and Courser’s Farm area, which is a BTO “red-listed” species with limited colonies nationally. These two colonies are the last in Hertfordshire, according to information -mail received by London Colney from Graham Knight (Herts Bird Club).

There are also concerns regarding the adverse impact of protracted development work on sites immediately adjacent to nature reserves (Colney Heath Common and Redwell Wood SSSI).

Roads infrastructure

There is, as yet, no modelling available to assess how well the proposal to develop the H2 site would perform in terms of the road infrastructure.

However, with only one new road effectively being proposed (the link to the B556), the pressure from vehicles moving into and from the site will evidently have a major impact on Coursers Road and the two routes from it (via the Bell roundabout or through Colney Heath onto the A414 at the

already problematic longabout junction, which already suffers from very considerable delays, particularly at peak times, and where Hertfordshire Police voiced concerns about traffic lights on the long-about delaying east-west traffic, even before any additional development has taken place).

London Colney residents are aware of the existing issues with the Bell roundabout; any significant additional traffic at this junction, with no mitigation measures proposed, is likely to be problematic. This anecdotal evidence is underpinned e.g. by findings from the HCC Southern St Albans Urban Transport Plan April 2009, which points out inherent difficulties with mitigation measures:

“[London Colney bypass] 2.29 The levels of traffic along the bypass, creates problems at the junctions on either end of the link. There traffic levels are high in the area so all arms of the junction suffers from congestion. This makes is difficult to improve the transport conditions by redesigning the junctions to reallocate priority.”

*Similarly, in relation to Bell Lane it states: “2.35 However, the variation between days suggests that when traffic is severe on the M25 it is used as an alternative route. **The congestion at the junction with Shenley Lane means that there is not any room for an increase in flow along this road.**”*

Public transport

In its own high-level assessment, Hertsmere noted that *“the accessibility mapping identified the site as scoring 2 out of 10 for accessibility, as the majority of the site is located a considerable distance from public transport and local services.”*

The Hertsmere document suggests creating a “link road” to the B556 for a “fast (non-stopping) route to Potters Bar station.” The logic for assuming a commuter preference for a less frequent rail service from Potters Bar over the Thameslink services (potentially accessed at St Albans, Radlett, or Elstree/ Borehamwood) is unclear, other than if inferring that the fast non-stopping route is meant as a dedicated bus service, whereas other destinations would be less accessible by bus (being stopping routes, even where directly accessible). However, if that is the case increased car commuting to the various Thameslink stations is the likely result.

The high level assessment also states “Without any transport improvements, 5% of the County Council’s transport policy requirements were met. ‘Concerns’ were raised against 40% of policy requirements and ‘significant concerns’ were raised against any 55% of policy requirements.” This clearly suggests that the proposed H2 site presents challenges with regard to transport, and would require significant improvements.

Specifically with regard to buses, in the high level assessment Hertsmere itself refers to a “limited number of bus routes” currently serving “the northern and western boundaries of the site”. The Hertsmere document refers to two services, the Route 84 running **St Albans – London Colney – South Mimms – Potters Bar – Barnet – New Barnet**, and route 658 running **St Albans – London Colney – Shenley – Borehamwood** (Monday to Saturday). The lack of bus options on a Sunday is potentially a serious constraint in itself, and there are no indications of mitigating measures to address this.

It is also noted that there is specific reference to additional bus provision in the high-level assessments for sites PB1 and PB3 in the Hertsmere document (PB1: “Extra bus routes would be needed to reduce reliance on car”; PB3: “Additional bus routes would need to run through the site rather than relying on existing or new stops”). It is surprising to see the absence of similar comment in relation to H2, particularly given that existing bus routes skirt the perimeter of the proposed site.

Employment

There is no evidence offered to suggest that the proposed employment development of EMP7 as an “innovation hub” can be realised – it remains an aspiration at this point; moreover, to some extent it would be offered potentially in competition to other development in the South-West Herts Group area, such as in the St Albans draft Local Plan Broad Location s6 ii), where the scale of development allows for measures to promote non-car use:

Policy L9 Primarily Business Use Areas....A new development area within the East Hemel Hempstead (Central) Broad location (Policy S6) is designated as a Primarily Business Use Area and is also designated as part of the Hertfordshire Enviro-Tech Enterprise Zone.”

Policy S 6 ii) of the St Albans draft Local Plan sets out, amongst other things, for that site:

“6. Sufficient variety of employment uses must be provided over time to offer in the order of 10,000 jobs...

7. The first phase of employment development will be required to provide some starter units / incubator space....

10. Multi-Modal Transport Interchange with facilities to encourage and facilitate modes of transport other than the private car.”

Moreover, given that the location of EMP7 adjoins an M25 junction and is less than five miles from the proposed Strategic Rail Freight Interchange, we believe the most likely employment use would prove to be for limited numbers of warehousing roles, i.e. limited benefits in terms of employment, but with the detriment of significant additional local HGV traffic.

It is also noted that the document produced by the planning consultants Turley (“A Vision for Redwell Garden Village, Hertsmere”, published November 2017, page 9) indicates “7,700 working-aged employed residents estimated to live in the new development”, whilst similarly claiming (p. 8) “a jobs to homes ratio of 0.7 jobs: 1 home”. Even if the employment site delivers the promised 4,000 jobs, the proposed jobs to working-aged employed residents is 4 jobs:7.7 workers (= 1 job: 1.925 workers). In other words, the developer’s planning consultant itself projects that at least 3,700 working-aged employed residents will be travelling away from this site for work, which again looks to be problematic as a sustainable solution from an employment perspective.

Lack of clarity in documentation

Hertsmere’s October 2018 “Planning for growth: potential sites for housing and employment – Public Engagement” document refers to the “potential capacity” as “4,000+ homes proposed”, whereas the November 2017 document produced by Turley, “A Vision for Redwell Garden Village, Hertsmere” refers to “up to 6,000 new homes (4,000 homes within the plan period)”. The lack of precision means that it is difficult to offer more considered responses e.g. with regard to potential demands on infrastructure, other than to add that concerns expressed at the level of 4,000 homes are significantly greater if the site is eventually built out to 6,000 homes.

Yours faithfully,



Cllr Malcolm MacMillan
Chairman, London Colney Parish Council