



Hertsmere Borough Council
3 Elstree Way
Borehamwood
Herts
WD6 9SR

6 December 2021

Dear Sirs,

London Colney PC response to HBC Section 18 consultation on Local Plan

London Colney Parish Council are writing to register their objections regarding the development of 6,000 homes at Bowmans Cross on the borders of the parish of London Colney, as part of the Regulation 18 consultation on Hertsmere Borough Council's Local Plan. We consider the proposed development on a Green Belt site at a location completely removed from existing settlements, to be a completely unreasonable proposal and a scheme that is being driven by a developer led agenda.

We object on the following grounds:

Green Belt

The entire site is within the Green Belt and therefore National policies apply. 'National Policy Guidance' outlines the importance of the Green Belt

- a) to check the unrestricted sprawl of large built-up areas.
- (b) to prevent neighbouring towns merging into one another.
- (c) to assist in safeguarding the countryside from encroachment

It is therefore our opinion that the Bowmans Cross proposal contravenes all three of these guidelines. The NPPF states that development should only take place on the Green Belt in 'exceptional circumstances' We do not believe that a case has been made by HBC that 'exceptional circumstances' exist that would justify taking this land out of the Green Belt. The NPPF also states that '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'

The area for development also includes the Watling Chase Community Forest, one of twelve community forests in the UK and the Timberland Trail which runs through the site. During the pandemic, residents from both St Albans and Hertsmere enjoyed this open space which will be denied to them if this development goes ahead.

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The Bowmans Cross proposal is currently a site of mineral of extraction/restoration that forms part of Hertfordshire County Council's mineral extraction plan.

The impact of the pandemic and projected social and economic trends will mean that existing Brown Field sites are better locations for development. The Green Belt should be the last place that Hertsmere should be looking to develop.

Housing Needs

The Draft Local Plan identifies the Southwest Herts Local Housing Needs Assessment (LHNA) as the source of data for assessing housing need for Hertsmere. However, the LHNA uses out-of-date projections from 2016 Office of National Statistics projections. We believe that the latest projections, currently available for 2018 and shortly to become available for 2020, as required by technical guidance, should be used. These show a projected decrease in new households in the Borough for the plan period, and therefore the number of houses planned should be reduced.

The Council has also failed to take account of the National Planning Policy Framework (NPPF) as revised in July 2021, paragraph 11, footnote 7, which permits local planning authorities to restrict the scale of development due to planning constraints including protection of Green Belt and other designated areas and sites. Housing demand has fallen according to government data.

Infrastructure

Medical Services

The Master Developers have stated that the first tranche of housing would be served by the new Summerfield medical centre in London Colney. Subsequent documents have indicated that a 'satellite facility' may be set up at Bowmans Cross to serve the initial development. This is not a guarantee and would be a decision taken by the Clinical Commissioning Group so not within the gift of the developer to make any promises. Residents in London Colney are extremely worried about any extra pressures put upon health services within London Colney and the extra traffic movements into the centre of London Colney via the Bell roundabout, should a 'satellite facility' not be provided.

The proposed time scale for provision of schools on site will inevitably impact on schools in St Albans which are already under pressure for places from St Albans District residents. Furthermore, the developers have stated that one of the secondary schools would have a swimming pool that would allow access to members of the public. Secondary schools can by law, apply for academy status which would be administered by a trust. A trust would be able to set their own conditions in relation to the school's assets and therefore, the Local Authority could not guarantee that access to a pool would be implemented or maintained.

Employment

According to the plan only 15,000 sq. m is dedicated to employment use. It would therefore seem extremely likely that most residents of Bowmans Cross would be travelling off site to work in other various locations.

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Traffic Impact & Air Quality

The NPPF states 'One of the tests for 'exceptional circumstances' is justified by the Authority relates to whether they have considered adequately 'other locations well served by public transport'. Many residents who live in Hertfordshire commute to work and there is no reason to believe that this trend would not be reflected in Bowmans Cross. The settlements of Radlett, Potters Bar and Borehamwood all have mainline stations, and it would seem preferable and more in line with Government guidelines for the Hertsmere plan to look to fulfilling its housing numbers around these settlements rather than in the proposed development at Bowman's Cross which would rely entirely on road transport.

It is the Parish Council's view that the proposed settlement of Bowmans Cross would have a serious, negative impact on the existing road networks and on the local communities of London Colney and Colney Heath and is therefore in contravention of Policy 14 of the Hertfordshire County Council that states: *'All after-use proposals must be acceptable in terms of traffic impact, both on the highway and on local communities.'*

There appears to be no evidence that Herts Highways have carried out 'up to date traffic modelling' in relation to potential traffic movements from Bowmans Cross, that considers the fact that the Strategic Rail Freight Interchange site at Park St in St Albans District has been discounted by the Planning Inspector as a potential site for residential use as outlined in the St Albans Draft Local Plan (withdrawn Nov 2020). Traffic predictions for the SRFI which was granted permission by a previous Secretary of State in 2012 predicted 10,000 daily lorry movements between the site and local feeder roads to the M10/ M1 and junction 22 of the M25. This will have a significant impact on the A414 and 1081, roads that would potentially form part of a road connectivity network for the Bowmans Cross development.

The proposal that Coursers Road will be closed to general traffic is unacceptable to residents. Coursers Road is an important link road between London Colney, Colney Heath and beyond. Any closure would force traffic onto other, already congested routes.

London Colney Parish Council is concerned about the consequences on residents' health and life expectancy, through increased traffic volume creating even higher levels of carbon emissions than the current ones, which are higher per household than the national average, with road transport being the main contributor of emissions. (Source community carbon calculator, centre for sustainable energy 2021)

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It would appear to us rather duplicitous that Hertsmere BC can declare a Climate Emergency in 2019, whilst in 2021, they are planning to use up a precious, environmentally protected site for housing. We trust that Hertsmere will carefully considers these comments and those of the residents of London Colney when taking their local plan to the next level of public engagement.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Malcolm MacMillan'.

Cllr Malcolm MacMillan

Chairman of London Colney Parish Council

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