



DRAFT HERTSMERE LOCAL PLAN – REGULATION 18 CONSULTATION

Response of the Barnet Society

4 December 2021

INTRODUCTION

The Barnet Society has over 700 members in and around the Chipping Barnet parliamentary constituency. This response draws on the advice and experience of our Committee and specialist advisers, who include architects, landscape architects, conservationists and engineers who currently work, or have worked, with central and local government and other organisations in the fields of housing, education and urban renewal.

Hertsmere forms our northern border, so we take a close interest in prospective developments in your District. Many of us enjoy your shops, restaurants, pubs, cultural and leisure facilities – and of course the films and TV programmes made in your studios. Some of us work in Hertsmere and some of our students attend your schools. In doing so, we travel through – and value highly – your Green Belt.

Our Society was founded in 1945 specifically to protect the countryside around Chipping Barnet, which was not then designated as Green Belt. In 1948 & 1951 it published guidebooks on local walks, *Rambles Round Barnet* & *Rambles in South Hertfordshire*. Updated versions are still in print. Most of the walks follow public footpaths within your Green Belt, and generations of Barnet walkers have benefitted and are grateful.

In the comments that follow, we refer to your draft Hertsmere Local Plan consultation document as 'the Plan'.

We generally support comments made on the Plan by CPRE Hertfordshire, Elstree & Borehamwood Green Belt Society and Elstree & Borehamwood Town Council.

Our primary concern about the Plan is its detrimental impact on the Green Belt, which we regard as in a sense ours as well as yours. Since it appears in many sections of the Plan, for simplicity we begin with general comments about the Green Belt and your housing proposals, and follow with specific comments on sections in your Plan.

THE GREEN BELT

The Plan says, "The strategic green belt will be protected..." That glosses over the fact that some 10% (the Plan is silent about the figure) of Hertsmere's Green Belt will be sacrificed to development.

We oppose development of the Green Belt on principle. Not only has it prevented ribbon development between Barnet, Borehamwood, Potters Bar and other Hertfordshire settlements, thereby preserving their cohesion and identity, but it has saved lovely countryside north and south of the M25 for the benefit of residents, visitors and wildlife for

two-thirds of a century. It will be even more precious in future, Covid-19 and COP26 having raised public valuation of green spaces in and around our built-up areas. Building on the Green Belt leads to urban sprawl, undermines our ability to tackle pollution, climate change and collapsing ecosystems, and eliminates local food production, wildlife habitats and recreation areas – issues that go far wider than Hertsmere in their impact.

It is disappointing that unequivocal commitment to protection of the Green Belt is not one of the Strategic Objectives of the Plan, and that it not even mentioned in Green Hertsmere.

We also regret that safeguarding and expansion of Watling Chase Community Forest, a pioneering project with which we were closely involved, is so fleetingly mentioned in the Plan.

HOUSING PROPOSALS

As residents of a Borough with housing challenges of its own, we sympathise with Hertsmere's difficulty meeting the Government's housing target, but believe it should be questioned, especially since Ministers have stated that reduction is appropriate where a Local Planning Authority possesses a significant amount of Green Belt or other protected sites. Account should also be taken of the 2021 Census results and demographic trends post-Brexit and post-Covid.

We are concerned too about the delivery of affordable and social housing. CPRE research shows that "only a tenth of homes built in the Green Belt are 'affordable' and these are rarely for social rent. Additionally, people living in Green Belt developments have poor access to public transport and are tied to owning and using cars, as well as being stuck with the cost of commuting, creating further financial stress for families on low incomes."

In the absence of an up-to-date Brownfield Register, it's unclear how rigorously Hertsmere has investigated re-use of brownfield sites as an alternative to Green Belt land. If Table 2 (P.16 in the Plan) is correct about the quantity of brownfield sites, significantly more than the 6,020 new homes claimed in Table 3 (P.17) ought to be possible.

The brownfield total is likely to be boosted by the exercise of Permitted Development Rights (PDR) through change of use to residential and additional floors on existing buildings.

We also believe that Hertsmere's proposed housing densities are unnecessarily low. Our analysis of sites in the Plan shows that, for example:

- The site north of Barnet Lane (BE6) would have 250 homes on 12.63 hectares, i.e. 19.8 dwellings per hectare.
- The site south of Potters Bar would have 14.2 homes/ha.
- Bowmans Cross would have fewer than 10 homes/ha.

CPRE's 2019 report *Double the density, halve the land needed* contains examples of housing built in recent years not exceeding four or five storeys high, with many of the homes having private gardens. In Barnet, Brook Valley Gardens off Mays Lane is an attractive mixture of 631 flats and houses with gardens, no more than four storeys high, at 84 dwellings per hectare. Over in Harlow, the award-winning low- and medium-rise Newhall neighbourhood will ultimately offer 2,200 homes at 22 dwellings per hectare.

A combination of a lower housing target, optimal use of brownfield sites, PDR and higher densities would dramatically reduce Hertsmere's need to resort to Green Belt land.

SPECIFIC COMMENTS ON PLAN

4. The Spatial Strategy (P.21 & other references): Table 8 – Proposed secondary school on land south of Barnet Lane (HEL800)

We doubt the viability of a new secondary school on this site. Sitting on our border, it might be expected to interest prospective parents and pupils from Chipping Barnet, Arkley and points westward. But Barnet is already well endowed with secondary provision. According to Barnet Council's 2020 document *Planning for New School Places*, demand for Reception class places in Barnet primary schools has been dropping since 2017, and demand for secondary places is starting to drop, reducing likely interest from Barnet families.

Since Hertsmere teachers would be on lower pay scales than Barnet teachers, recruitment of staff for the new school could also be problematic.

We are also concerned about the transport implications of a school of potentially 2,000 students and 500 staff. Its catchment area would be wide, and many students and staff would live well beyond walking distance. The only public transport currently available is bus services 107 & 384, which would need a great deal of revision in order to carry the increased loadings. Cycling would be a desirable option, but the Plan makes no mention of the dedicated cycleways essential to encourage its use. The number of school buses and cars required would contribute significantly to the frequent vehicle congestion on Barnet Lane.

We regret that the Plan fails to notice that the site adjoins the Regional Park proposed in Barnet Council's draft Local Plan. This will straddle Moat Mount and Scratchwood Open Spaces, enrich biodiversity, open up new leisure opportunities and create jobs. It will also make possible new or enhanced walking and cycling routes across northern Barnet.

The least Hertsmere's Plan should do is to pencil in the possibility of new cycling and walking links across site HEL800 to facilitate access by Elstree & Borehamwood residents to and from the Regional Park. A more imaginative response would be to consider how Hertsmere's land could itself become a gateway to the new Park, creating new environmental, educational and marketing opportunities to our mutual benefit.

We urge Hertsmere to undertake its Duty to Co-operate with Barnet Council over this.

4. The Spatial Strategy (P.34, 96 110 & other references): Potters Bar – proposed housing development sites PB3, HEL162, HEL177 & HEL318

We have two major concerns about the 1,170 homes proposed between Potters Bar and the M25: firstly, the loss of Green Belt, and secondly, the transport implications.

Regarding the first point, not only do the present fields provide an attractive working agricultural landscape between Potters Bar and Barnet, they link visually with Bentley Heath, Dancers Hill, Wrotham Park, Dyrham Park and other greenery to create a panorama that's much greater than the sum of its parts. The Baker Street and Barnet Road motorway bridges will make dismal southern gateways to the new housing, and it's hard to imagine a pleasant life within the sonic and pollution shadow of the M25.

As to the second point, the developments would have significant and adverse effects on both Hertsmere and Barnet roads. Cars and cycles would increase pressure on both roads and parking space. The few roads between Potters Bar and Barnet are already congested at times, especially when there is any disruption on the M25.

Parking space in the vicinity of our Underground and National Rail stations is already under stress, because commuters and leisure-seekers from Hertsmere take advantage of their excellent links to Central London to park-and-ride. This will increase if Transport for London's proposed housing schemes on station car parks proceed. It would be further exacerbated by new housing around Potters Bar unless the Plan includes convincing strategies to counter it, e.g. by expanding local employment, shopping and services, as well as improving bus routes to give much better access to Potters Bar Station and key destinations east and west. The Plan says little about any of these.

5. Individual Place Strategies (PP.19, 43, 106 & other references): Bowmans Cross – proposed site NS1

Our concern about Bowmans Cross is that it is the biggest proposal in the Plan – building over some 5% of Hertsmere's Green Belt – yet lacks the rigorous justification that a new township half the size of Borehamwood and seven-tenths that of Potters Bar deserves. For example: a basic requirement of a truly sustainable new community would be that it is centred on a highly efficient, 21st century regional public transport network. The only such network with a chance of being built within the life of the Plan is Hertfordshire's A414 Mass Rapid Transit proposal – but that would bypass Bowman's Cross.

8. A Strong Local Economy (P.128 & other references): Policies E6 & 8 – Media Quarter, Borehamwood

We have two major concerns about the proposed Media Quarter, Green Belt and economic.

The first is its contribution to the decimation of Hertsmere's (and our) Green Belt. We cover the principle of Green Belt protection above, but here we focus on particular qualities of Site C and its surroundings.

Site C forms part of Green Belt Parcel 18 in Arup's *Green Belt Assessment (Stage 1)*, and is described thus:

- “The parcel contains less than 5% built form and is characterised by a strong rural character throughout” and
- “The majority of the parcel [however] consists of open fields with long views and maintains an unspoilt rural character”.

It is scored 3+ for Purpose 1, 3 for Purpose 2 and 4 for Purpose 3 out of a maximum possible 5 points, i.e. an average score of about 3.5 (or 70%) – a good solid score. At 1,480ha, it is by some distance the biggest parcel in the Borough. It is also contiguous with Parcels 24, 30, 31, 34, 38, 40 & 49, most of which have similar scores, and which together form a fine tract of largely unspoiled countryside. Building over Site C will not only have a destructive impact on Parcel 18 but also be detrimental to seven other parcels of Green Belt.

We are disturbed, too, that the thriving stables at StrangeWays Equestrian Centre would have to go. It is telling that that this is not mentioned anywhere in the Plan; that there is only one reference to riding in the whole of the Plan (in Policy GB1,iii); and that loss of Strangeways would directly contradict Policy GB1's commitment to “new and improved access to and within the countryside for walking, disabled visitors, cycling and horse-riding”.

Our second major concern is that we believe there are strong economic arguments against building this huge complex, which will have five times more studios than currently exist in Elstree & Borehamwood.

While there would be some short-term gain in local employment during its construction phase, it would comprise mainly low-skilled jobs, with no guarantee it would be followed by skilled employment opportunities. There are already signs of shortages in a range of key

film- and TV-making skills, so while the proposal to extend Elstree Screen Arts Academy is welcome (although not on Site C, as explained above), the Academy's output of graduates alone would not be able to fulfil Hertswood's needs given the statement in the Plan's Foreword that the project would create "thousands of jobs". Also, with competition for skilled workers predicted to be intense over the coming few years, not all graduates will necessarily seek employment in Borehamwood.

At the present time planning applications have been granted or are in preparation for 14 new studio projects in London and the South-East alone. Some are backed by established industry players, such as the development by Hollywood's Sunset Studios in Broxbourne, while established facilities like Pinewood, Leavesden and Elstree Studios are adding new stages and will need additional staff. These can offer graduates the chance to hone their skills as part of an experienced team, potentially leaving unaffiliated start-ups such as Hertswood Studios struggling to recruit local talent and forcing it to look farther afield.

Even if the Mass Rapid Transport system tantalisingly mentioned in the Plan came to pass, in the absence of an extension to Borehamwood access to the Media Quarter would depend largely on two motorways, one of them notorious for traffic jams.

The number of studios already under construction across the UK is likely to be sufficient to serve the needs of the film and TV industry for at least the next 7-10 years, and quite possibly for the life of the Plan. If this project were to fail commercially, Hertsmere will face the worst of all worlds: loss of precious Green Belt – because its restoration would be unaffordable – and a large empty commercial site for which a new purpose would have to be found. A distribution, warehousing or fulfilment centre are likely options, with all the additional heavy goods traffic that would bring and, with today's automation, few jobs.

15. Sustainable Travel (PP.93-103)

It is disappointing that transport, which will be vital to the Plan's success, especially in outlying and semi-rural areas, occupies so few pages. And although its intentions are good, for example to promote walkable neighbourhoods, support active travel and reduce car usage, there is little detail to underpin them.

The Plan is short of incentives for car-drivers to minimize their use (or abandon them altogether). The encouragement given to electric vehicles will not do this (and will only reduce emissions if their power source is zero-carbon).

Given the known problems with Hertsmere roads, the physical difficulty of improving many of them and the lack of funding to do so, it would have been encouraging if the Plan had at least identified the most critical places and routes for future attention, for example:

- Interchange at railway stations
- The desirability of extending Oyster Card or similar arrangements across Hertsmere
- Possible cycle lanes and off-road cycleways
- Expanding and linking footpaths.

The Plan should also be more frank about the opportunities and limitations of Hertfordshire's A414 Mass Rapid Transit proposals.

Land S-E of M25 Junction 24 (site un-named but adjoining Stagg Ridge) & LB of Enfield Strategic Policy SP E1 & Site Allocation SA54

Not mentioned in the Plan, but marked on its accompanying map, is a local wildlife site. Immediately across the Borough boundary from it, on the north side of The Ridgeway

(A1005), Enfield has designated 11ha for a logistics hub in its draft Local Plan. It would include “a minimum of 30,550 sq m employment floorspace (light and general industrial, storage and distribution, and related sui generis uses)”. Such a large commercial development does not sound compatible with a local wildlife site next door.

Enfield’s Plan also mentions that the Council would “seek to deliver the redevelopment of the wider site (in LB Hertsmer) to provide a coordinated employment offer”. This presumably refers to the 17ha Site PB4 (land south of Park Avenue and east of Southgate Road, Potters Bar) in Hertsmer’s Plan. Development of the combined sites PB4 & SA54 would involve loss of yet more Green Belt land, and have a huge impact on existing and proposed new homes in Potters Bar, as well as traffic and environmental quality – but it is not mentioned at all in Hertsmer’s Plan.

There seems to have been no liaison between Hertsmer and Enfield on this major development possibility, despite their legal Duty to Co-operate.

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