

26/1236/OUTEI HOME FARM, RADLETT OUTLINE APPLICATION (WITH ALL MATTERS RESERVED EXCEPT ACCESS) COMPRISING A RESIDENTIAL DEVELOPMENT OF UP TO 650 DWELLINGS (USE CLASS C3); A ONE-FORM ENTRY PRIMARY SCHOOL AND NURSERY; SUPPORTING MIXED USES (USE CLASSES E AND F) WITH ASSOCIATED LANDSCAPING; AMENITY SPACE; DRAINAGE INFRASTRUCTURE AND ALL OTHER ASSOCIATED WORKS

Letchmore Heath Village Trust objects to this application for up to 650 homes on Green Belt farmland. This is a major, permanent change to the countryside around Radlett. The applicant has not convincingly addressed the harm, the pressure on local infrastructure or the combined effects of other developments. Access is being decided now but the Council must resolve these concerns before granting any permission, rather than leave fundamental questions unanswered.

1. GREEN BELT AND GREY BELT

Home Farm remains designated Green Belt. Its open fields form part of the countryside beyond Radlett and make a strong contribution to safeguarding that countryside from encroachment, as the applicant's own Green Belt material acknowledges. The applicant's conclusion that the land makes no contribution to checking unrestricted sprawl depends on a narrow treatment of Radlett's status. But it does not answer the wider question of what 650 homes would do to the openness, permanence and purposes of this Green Belt. The Trust challenges the assessment and asks Hertsmere to examine the actual function of this land, its relationship to Radlett and the cumulative effect of development on the remaining Green Belt. In particular, it should explain whether the combined development of Home Farm (HRA5), adjoining Cobden Hill (HRA3) and other relevant allocations would undermine the purposes or integrity of the Green Belt that remains, rather than treating each parcel in isolation. A conclusion on one Green Belt purpose does not dispose of the others; nor does describing the site as provisionally grey belt make its substantial countryside harm disappear.

The emerging Regulation 19 Plan describes Home Farm as provisionally grey belt. That provisional description does not establish that the land qualifies as grey belt for this application, and it does not remove its Green Belt designation. Until a new plan is adopted, Home Farm must be determined as land within the Green Belt, applying the relevant tests in the August 2026 NPPF. Under GB7(1)(g), the applicant must establish that this is genuinely grey-belt land, that the remaining Green Belt would not be fundamentally undermined, that there is evidenced unmet need, that the location is sustainable under TR3 and that the Golden Rules in GB8 are met. The separate station based route in GB7(1)(h) must also be justified, not assumed. Parts of this large site are a substantial walk from Radlett station and everyday facilities; buses are limited; the station is not fully step-free; and station parking is limited and already full early on weekday mornings. That matters particularly to people unable to walk to the station.

The Trust does not accept that the applicant has established an applicable exception to the ordinary Green Belt restriction. If no GB7 exception is demonstrated, this is inappropriate development under GB6. In the Trust's view no very special circumstances have been demonstrated that clearly outweigh the harm to the Green Belt, its openness and the other identified harm. Permission should therefore be refused.

The applicant's Planning and Affordable Housing Statement (August 2026, p.23) acknowledges that the NPPF changed on 17 August 2026 and that other supporting documents were prepared under the previous version. Its brief consideration of some new provisions does not resolve the issue. Hertsmere should require a clear explanation for each relevant document of how the application complies with the policy now in force, with updated assessments wherever needed. This is especially important for Green Belt, sustainable location, transport and the overall planning case.

The August 2026 NPPF policies GB6, GB7 and GB8, together with Hertsmere's adopted Core Strategy policy CS13 and relevant SADM Green Belt policies (including SADM22 and SADM26, where applicable), must be applied to this decision; the emerging allocation is not adopted policy.

2. LANDSCAPE AND VISUAL IMPACT

The applicant's own landscape assessment identifies significant adverse effects on the character and experience of this countryside even 15 years after planting. This is lasting harm, not a temporary inconvenience, and the Council must give it significant weight. The assessment also identifies significant visual effects for people using local public footpaths, including the Hertfordshire Way, and for nearby residents. These paths are very heavily used by local people and are among the area's most important everyday walking routes. Planting cannot recreate the open countryside that would be lost. These effects weigh strongly against the proposal under NPPF N2, Core Strategy CS12 and SADM11, with public-rights-of way impacts also engaging NPPF TR8.

The applicant also identifies a significant Moderate–Major Adverse cumulative landscape effect on the Aldenham Plateau. This is a serious warning about what happens when Home Farm is considered alongside other major developments. Hertsmere must update that assessment to reflect the Regulation 19 proposals and give the resulting harm proper weight. It should not approve the scheme on the basis that landscaping has resolved these effects.

3. ACCESS, HIGHWAYS AND TRANSPORT

The transport case relies heavily on residents driving less than would ordinarily be expected. The 2021 Census recorded only 270 of 3,188 Radlett households (8.5%) without a car, against 23.3% across England and Wales; 1,750 Radlett households

(54.9%) had two or more cars. Home Farm would be further from the centre and station than much existing housing, up to 1.9 km in part. A presumed substantial shift away from cars is unrealistic and is not supported by convincing evidence. The emerging Regulation 19 proposals provide very little additional employment in Radlett itself, so many new residents are likely to commute outside the settlement. The applicant must show how its employment and commuting assumptions translate into credible journeys by public transport, walking and cycling rather than private car. The station is not fully step-free, and its limited car park is, in residents' experience, full early on weekday mornings. A proposed bus stop is not a bus service. The Council must require firm details of routes, frequency, hours, funding, start dates and long-term provision, together with realistic evidence of likely uptake and early delivery of safe walking and cycling routes. Any new bus service must satisfy all these before first occupation.

The Watling Street junction is not a detail that can be sorted out later: access is being determined now. The Council must be satisfied by drawings, modelling and independent highways evidence that the new signals, queues, road safety, crossings and surrounding junctions will work safely and satisfactorily, including the anticipated 122 homes on HRA3. In the applicant's two-form-entry-school AM-peak conventional traffic sensitivity test, the junction reaches approximately 92.3% saturation and has – 3.9% practical reserve capacity. That calls for particular scrutiny of the assumptions and resilience of the junction; the more so if County require, as seems likely a three form-entry-school. The adjoining HRA3 allocation proposes another 122 homes. Although it is not yet permitted, Regulation 19 paragraphs 17.43–17.44 and 17.72 expressly anticipate coordinated design and access arrangements between HA3 Cobden Hill and Home Farm. As access is being determined now, Hertsmere must demonstrate that the proposed Watling Street junction does not prejudice the adjoining allocation and that the two sites can operate together safely, including walking and cycling connections. The cumulative assessment must also include appropriate scenarios for HRA2, HRA6 and consented commercial development, including warehousing and its HGV traffic.

Aldenham Parish Council commissioned Sanderson Associates (Fairhurst Group LLP) to prepare its May 2026 report, 'Accessibility by Sustainable Travel Modes' (project 402338-001-03), for the Regulation 18 consultation. The report was submitted in that consultation, so Hertsmere already has it. Although the study examined the then candidate site HRA SA6, rather than this final 650-home scheme, its evidence about the location and existing transport provision is directly relevant. At paragraphs 2.6.3 and 2.7.8 it records that there are no everyday facilities within 1 km on foot apart from Battlers Green Farm Shopping Village. Paragraph 2.7.3 identifies no dedicated cycle routes in the vicinity. Paragraph 2.7.4 places the nearest existing bus stops about 1.4 km away; paragraph 2.7.8 concludes that the bus service is insufficient for the indicative development capacity. Paragraph 2.7.7 gives Radlett station as approximately 1.9 km

away, a 24-minute walk. The Trust expects the applicant to explain, with evidence, how the proposed measures overcome these existing deficiencies and how their effectiveness will be secured before occupation.

Common Lane must not become a second ordinary vehicle entrance. The Trust seeks an enforceable arrangement allowing pedestrians and cyclists through but restricting vehicle access to police, ambulance and fire vehicles responding to emergencies. The barrier or bollard system must be of a type expressly approved by those emergency services and operable by them, but not by residents, delivery drivers or other unauthorised users. The drawings currently indicate removable or droppable bollards; that is not a sufficient safeguard on its own. Hertsmere must secure the exact design, control arrangements, maintenance and enforceable restrictions, following consultation with the police, ambulance and fire services and HCC Highways. Any genuinely necessary maintenance arrangements must not create a loophole for general traffic.

The applicant has indicated a five-to-seven-year build-out programme, yet the Environmental Statement's construction traffic calculation assumes 50 dwellings completed per year. For 650 dwellings, that assumption implies a 13-year build-out ($650 \div 50 = 13$), substantially longer than the earlier programme. Hertsmere should require the applicant to reconcile the stated programme with the traffic assessment, explain the assumed number of concurrent construction phases and the peak annual construction rate, and assess cumulative construction traffic during the relevant overlapping periods. Prolonged construction would also affect residents and local roads.

The NPPF's sustainable transport and development requirements and Hertsmere's adopted Core Strategy transport policies CS24, CS25 and CS26, insofar as applicable, require these access and highway-safety matters to be resolved; HCC Highways' substantive advice remains essential.

4. WATER SUPPLY AND WASTEWATER

The applicant's environmental material shows that the existing Thames Water foul sewer network needs reinforcement to accommodate the development. Thames Water must confirm in writing the present network capacity, the specific reinforcement needed, any treatment-works constraints, and the cumulative demand from committed and reasonably foreseeable residential and commercial developments, as well as the expected completion programme, responsibility for funding and the maximum number of dwellings and commercial premises that could safely be occupied before upgrades are operational. Hertsmere should obtain supporting modelling and secure enforceable occupation restrictions tied to completion of any necessary works. Local sewer

capacity and treatment-works capacity must be assessed separately; proposed strategic upgrades should not be assumed to resolve a site-specific constraint.

Hertfordshire is experiencing drought conditions, and the applicant correctly identifies the relevant Affinity Water resource area as seriously water stressed. That makes reliable long-term water supplies especially important. Affinity Water must confirm, with up-to-date supporting figures and assumptions, the site's distribution-network capacity, the long-term supply position under drought and climate-change scenarios, the cumulative demand allowed for from committed and reasonably foreseeable residential and commercial developments, and any reinforcement, funding or phasing requirements. A connection offer alone is not evidence of long-term strategic water resource resilience. For the proposed former Mercure data centre (25/1781/FUL), Hertsmere's Climate Change & Sustainability consultee calculated approximately 764 million litres annually for a particular evaporative-cooling scenario at 0.4 litres/kWh. In considering this, the Council should take note of the fact that the former Mercure Hotel site is allocated for a data centre in the Regulation 19 draft Local Plan.

The applicant's proposed residential water-consumption standard of approximately 104.2 litres per person per day must also be tested against actual consumption. According to the Environment Agency's Water Resources Performance Report for 2024–25, Affinity Water customers used an average of 153.9 litres per person per day, compared with the England average of 136.5 litres. The proposed standard is therefore approximately 32% below actual average consumption across the Affinity Water supply area. Although efficient new homes may use less water than existing housing, Hertsmere should require the applicant to demonstrate how the proposed standard will be achieved, monitored and maintained, and to test the cumulative water-demand assessment against realistic consumption scenarios and to explain what would happen if actual consumption is closer to the much higher average for Affinity Water customers.

The application material describes Affinity Water as being “alongside” the applicant parties. The Council should clarify Affinity Water's role and obtain clear evidence about water resources and network capacity.

These questions must be resolved in accordance with Hertsmere SADM13 and SADM17, together with the relevant national water, environmental and infrastructure policies, with enforceable occupation restrictions where required. SADM17 is particularly relevant to the need to demonstrate adequate water and wastewater infrastructure and timely provision of any required improvements.

5. SCHOOLS, HEALTHCARE AND COMMUNITY FACILITIES

The Trust strongly objects that the application lacks a convincing plan for providing school places at the right time. Hertfordshire County Council's response to the Regulation 18 proposals identified a potential need for up to three forms of entry (3FE)

at Home Farm and up to a further 2FE elsewhere in Radlett. The present application proposes an initial one-form-entry (1FE) primary school (210 places), with land reserved for expansion to two forms of entry (2FE, 420 places). The Trust understands that the County Council may wish provision for three forms of entry (3FE) to be considered; the current application does not itself propose or safeguard a 3FE school. The applicant's Education Provision Assessment estimates around 123 primary pupils, while the County Council's methodology could produce around 370. That is a major disagreement about the scale of provision required. Although HCC's earlier Home Farm figures related to the larger Regulation 18 allocation of 1,040 homes, this does not mean Radlett's overall education needs have diminished. The Regulation 19 proposals redistribute development rather than reduce the overall scale of growth: total anticipated new homes in Radlett rise from 2,900 in Reg 18 to 2,907 in Reg 19. The applicant cannot simply assume its lower estimate is right. Hertfordshire County Council must provide an updated, quantified assessment for the 650-home proposal and the other proposed Radlett allocations, including SEND requirements.

The timing is just as concerning. The applicant proposes that the primary school should not open until Phase 3, after approximately 350–400 homes have been occupied. Where are the children from those first hundreds of homes supposed to go to school? Which existing schools have places, how many, for how long, and how will children get there? These are basic questions which must be answered satisfactorily. A funded and enforceable timely opening trigger, together with any necessary interim school places and transport arrangements, is essential.

There is no secondary school proposed at Home Farm, and there is no secondary school in Radlett itself. Under Regulation 19, the five proposed Radlett housing allocations increase the number of homes by around 82% of the households recorded in the 2021 Census. Including a further 272 anticipated homes from smaller sites, windfalls and existing permissions brings the total to an approximate 91% increase in existing household figures. That is seven more anticipated homes than under Regulation 18, not fewer. Home Farm may be among the first sites developed, but that is no answer to the cumulative demand which will follow. Children will reach secondary school age from the outset, not only when the last houses are built. The County Council must identify the secondary schools expected to serve these families, the places available and forecast, journey times and transport, and whether new secondary provision or expansion elsewhere will be necessary. If new capacity is needed, it must be ready when the demand arises, not years afterwards. The same applies to SEND places. Necessary land, funding, contributions and delivery triggers must be secured. The application is unacceptably silent on primary healthcare. No GP surgery or other identified primary healthcare provision is proposed as part of Home Farm. The applicant's community hub is not a GP practice, and the Trust does not suggest that the developer has offered it as one. Where will residents register with a GP, and where will

the additional appointments and clinical capacity come from? This is not simply a question of 650 homes: Home Farm is one of several substantial Radlett housing developments proposed under Regulation 19, which together with smaller sites and existing permissions would add an anticipated 2,907 homes. The overall number has not fallen since Regulation 18. Hertsmere must obtain a clear, written assessment from the relevant NHS bodies of existing capacity, the additional population and demand from all these developments, and the locations, funding and delivery dates of any necessary new or expanded primary healthcare facilities. The absence of an identified solution is a serious weakness in the application.

The convenience store, community hub and other proposed facilities must also be delivered early enough to serve residents, rather than being deferred until the development is substantially occupied. Hertsmere should not treat promised facilities as established sustainability benefits without binding occupation-linked delivery arrangements.

These deficiencies engage the August 2026 NPPF requirements for sustainable access to services, including TR3, and Hertsmere Core Strategy CS18, CS19 and CS21 where applicable. Necessary, directly related and proportionate mitigation must be secured through section 106 obligations, following updated advice from HCC and the relevant NHS bodies.

6. FLOOD RISK AND DRAINAGE

The applicant's Flood Sequential Test identifies a reasonably available alternative site with a lower flood-risk profile and concludes that Home Farm does not pass the Sequential Test. Hertsmere should explain how that conclusion fits with the latest plan-level flood evidence and identify the policy basis for its decision. This engages NPPF policy F5 and Hertsmere SADM14. The Council must address this apparent conflict directly; an emerging allocation does not, by itself, resolve it.

The proposed drainage strategy must also be assessed against Hertsmere SADM15.

7. HERITAGE

The heritage setting deserves considerably greater protection than this proposal offers. Battlers Green House is Grade II* listed, while the historic barns to its east are Grade II listed. The barn about 50 metres west-north-west of Battlers Green Farmhouse is also Grade II listed. The development would bring a substantial new housing estate into the rural surroundings in which these buildings are experienced. The Trust objects to the harm to their setting and significance. Under section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, the Council must have special regard to the desirability of preserving listed buildings and their settings. Adopted Core Strategy policy CS14 and SADM29 require protection of heritage assets. The August 2026 NPPF, policy HE6, requires substantial weight to be given to conservation of designated

heritage assets, with greater weight for more important assets, and any harm to be properly justified and weighed against public benefits.

The western setback, restored orchard, open land and planting proposed to protect the historic setting must be secured in the approved plans and long-term management arrangements. The proposed lower-density, barn-influenced character of the western edge must also be secured through the design code and later approvals, rather than left as an aspiration. Landscaping does not by itself undo the change from open farmland to an urban edge. The access off of Common Lane must remain restricted to walking, cycling and genuine emergency access. The Trust asks the Council to identify the degree of harm to each affected listed building, explain the weight it gives that harm under HE6, CS14 and SADM29, and refuse permission if the statutory and policy tests are not met.

8. AGRICULTURAL LAND

The applicant identifies approximately 41.7 hectares (103 acres) of agricultural land: about 37.2 hectares (92 acres) of Grade 2 and 4.5 hectares (11 acres) of Grade 3a. The whole of this identified area falls within the nationally recognised category of best and most versatile agricultural land, including a particularly substantial area of Grade 2 land. The applicant's own Environmental Statement assesses its permanent loss as a major adverse effect.

This high-quality agricultural land is capable of making a valuable contribution to food production. Once developed, its productive agricultural potential would be permanently lost. The scale of that loss is substantial and should be given significant weight.

The August 2026 NPPF, policy N2(1)(b), expressly requires development proposals to take account of agricultural land quality, including its grade, and provides that where significant development of agricultural land is necessary, areas of poorer-quality land should be used where possible. Natural England's guidance on assessing development proposals on agricultural land also emphasises the importance of avoiding unnecessary loss of best and most versatile land.

The Trust does not consider that the applicant has adequately justified the permanent loss of this substantial area of high-quality farmland or demonstrated that reasonable alternatives involving less valuable agricultural land have been properly considered. The Council should also examine the cumulative loss of productive farmland arising from other proposed developments in the area.

The Trust asks Hertsmere to address NPPF policy N2(1)(b) expressly, consider the weight given to the applicant's own finding of a major adverse effect, and demonstrate how that harm has been weighed against the claimed benefits of the development. The

proposed allocation of Home Farm in the emerging Local Plan does not remove the need for that assessment.

9. TREES AND WOODLAND

The mature trees and hedgerows along Common Lane and around Battlers Green are part of what makes this landscape distinctive. They support wildlife and help define the setting of the listed buildings. Adopted policy SADM12 calls for retention of healthy, high-quality trees and hedgerows. The August 2026 NPPF, policy N3, addresses retaining existing trees, appropriate new planting and long-term maintenance; policy N2 addresses the conservation and enhancement of habitats and landscape character. The Trust wants firm protection of these features, not merely an intention to retain them. Layouts, construction exclusion zones, buffers and long-term management must be secured before development puts them at risk.

The potential ancient or veteran status of trees identified as T30, T69, T73, T107 and T158 must be resolved before the detailed layout is fixed. The NPPF's policy N6(2) protection for irreplaceable habitats, including ancient woodland and ancient or veteran trees, must be applied where relevant. The Council must require evidence of the trees' status, adequate root-protection areas and buffers, and a layout that avoids damage. The mature western boundary should be retained and reinforced, not treated simply as screening that can be replaced by new planting.

10. ECOLOGY AND BIODIVERSITY NET GAIN

The Trust objects to the application on ecological grounds. Hertfordshire County Council's ecology advisers (LEADS), in their consultation response of 8 October 2026, expressly concluded: "Insufficient information to determine application." They advised the planning officer either to refuse the application or advise withdrawal, or to request further information and reconsult LEADS when it is supplied. That is a serious warning from the Council's specialist advisers. Hertsmere should not grant permission while these matters remain unresolved.

LEADS identified shortcomings in the assessment and protection of Moses Dell ancient woodland and other woodland near Aldenham School. It called for proper woodland buffers and a mitigation and management strategy. Further aerial tree inspections for bats, badger investigations and clarification of the great crested newt process were also required. The ecological enhancements and Construction Environmental Management Plan need to be properly specified. These are not matters which should simply be postponed if they could affect the layout or developable area.

The breeding-bird evidence identifies at least seven skylark territories and two yellow wagtail territories whose arable habitat would be lost. LEADS requires like-for-like or better skylark compensation to be agreed before determination. The applicant

proposes approximately 1.7 hectares for ground-nesting birds, but has not yet demonstrated to the ecology advisers' satisfaction that the location, extent and long term management will compensate for the habitat lost. Any scheme must be secured against conflicting recreational use and considered alongside nearby development proposals which may remove other farmland relied upon as alternative habitat.

Although the submitted biodiversity metric indicates a 16.02% gain in habitat units, the hedgerow calculation has a deficit of 1.75 units and does not presently satisfy the hedgerow trading rules. Whilst LEADS confirms that the minimum pre-determination BNG information has been provided; this should be distinguished from whether the proposed hedgerow deficit and longer-term delivery arrangements are satisfactorily resolved. The Trust requires a credible, deliverable route to meeting the statutory biodiversity net gain requirements, with suitable land, enforceable management and monitoring for at least 30 years. LEADS indicates that the hedgerow deficit and trading rule compliance may be addressed through the statutory biodiversity gain plan after permission; however those matters should not be conflated with the separate ecological surveys and skylark compensation that LEADS requires before determination.

The Trust asks Hertsmere to require the outstanding surveys, woodland protection measures, bird compensation strategy and ecological management proposals, and to refer them back to LEADS for its further advice before determining the application. The separate LEADS conclusion that the access arrangements raised no overriding ecology objection must not be mistaken for support for the wider development.

These unresolved ecological matters engage the August 2026 NPPF policy N2, Hertsmere Core Strategy CS12 and SADM10, alongside the statutory biodiversity net gain requirements and the applicable EIA Regulations.

11. CONSTRUCTION, PHASING AND ENVIRONMENTAL SAFEGUARDS

The Council must secure detailed construction access and HGV routes before work begins. The applicant should reconcile its previously indicated five-to-seven-year buildout with the 13 years implied by the Environmental Statement's assumption of 50 homes completed annually, and assess the peak traffic effects of any accelerated or overlapping phases. The Transport Assessment relies materially upon modal shift away from private cars. The Trust does not believe that this shift is possible given the distance from the centre, the poor public transport, the rural lanes in the area and lack of local employment opportunities. Nevertheless, the promised bus service and principal walking and cycling connections should therefore be operational from first occupation. The section 106 agreement should secure the commencement, funding and minimum duration of the proposed bus provision. If the applicant relies upon reduced car use to

make the scheme acceptable, the alternatives which make that reduction possible must be available when residents first move in.

A comprehensive phasing and infrastructure delivery schedule should be secured through the section 106 agreement and conditions, linking occupation to the timely provision of transport measures, utilities, sustainable drainage, green infrastructure and ecological, landscape and heritage mitigation. Infrastructure necessary to make a phase acceptable must be delivered before or alongside that phase, not deferred until later.

As explained in Section 5, the proposal is for a 1FE primary school with land reserved for 2FE, while HCC may wish 3FE provision to be considered. The detailed layout must safeguard adequate land for the capacity ultimately required, including outdoor play and sports areas, without unacceptable noise effects or constraints on expansion.

As explained above, the cumulative traffic forecasts should be updated to reflect committed and reasonably foreseeable residential and commercial developments and the revised Regulation 19 distribution. The air-quality assessment should then be reviewed against those updated traffic forecasts, rather than relying upon superseded vehicle-flow assumptions. The associated noise evidence should also be reconsidered where the revised traffic assumptions materially affect its conclusions.

A robust Construction Environmental Management Plan should be secured to control construction noise, dust, working hours and other temporary effects throughout the prolonged build-out period.

The all-electric energy strategy, air-source heat pumps, enhanced building-fabric performance and solar panels relied upon in the applicant's carbon assessment should be secured through the permission and Reserved Matters. Any material departure from those assumptions should require appropriate reassessment.

Water efficiency must also be secured. As explained above, the applicant has modelled water level usage at approximately 32% below the Affinity Water average. Hertsmere should require evidence explaining how this level will be achieved and maintained in practice, and secure the proposed figure as a maximum through enforceable design and specification requirements. The implications for the cumulative water-demand assessment are addressed in Section 4. The site forms part of a relatively dark rural environment. Detailed lighting proposals should minimise illumination and light spill, particularly along retained hedgerows, woodland, ecological corridors, Common Lane and the western rural edge. Appropriate controls must be secured through conditions and Reserved Matters.

These controls and phasing commitments are necessary to meet relevant NPPF provisions, including TR3, TR6, DP3 and N2 as applicable, and Hertsmere Core Strategy

CS16, CS17 and CS24–CS26 and policies SADM17 and SADM20. They must be secured through enforceable conditions and section 106 obligations.

12. CUMULATIVE EFFECTS OF OTHER DEVELOPMENTS

The Environmental Statement (Volume 1, Chapter 2, paragraph 2.17 and Table 2.2) relies on a cumulative search undertaken in May 2026. Since then, the distribution of proposed development around Radlett has changed materially and further substantial commercial development has also progressed through the planning process, including warehousing and energy infrastructure. Hertsmere must require a clear, updated list showing which developments are included in each environmental and transport assessment, what has changed since May 2026, and whether any significant effects have been omitted. Inclusion in the ES cumulative schedule (Table 2.2) must be distinguished from inclusion in the quantitative traffic baseline (Table 6.14); the Council should require a scheme-by-scheme reconciliation, including how background growth assumptions avoid both omissions and double-counting. Also relevant is the professional traffic study commissioned by Aldenham Parish Council for the Regulation 18 consultation documents existing junction problems against which additional housing and commercial traffic must be assessed. Hertsmere must satisfy itself fully that those findings have been properly taken into account in the current Transport Assessment.

The updated schedule should distinguish the South of Harper Lane scheme (25/0885/OUTEI, up to 200 homes), identified in the applicant's ES Table 2.2, from the separate former Ivories site (274 homes) in the recently adopted St Albans Local Plan. It should also reflect the Regulation 19 housing pattern and use the latest site boundaries and assess the revised distribution of traffic and infrastructure demands, rather than assuming that fewer homes at Home Farm means fewer homes across Radlett. It should also explain the treatment of the emerging Borehamwood/Elstree allocations, particularly HBA11 (170 homes), HBA15 (486 homes), HBA16 (150 homes) and the employment allocations HBA21 and HBA22, distinguishing these from overlapping applications and permissions. The Council should check how ES Table 2.2 and the Transport Assessment deal with the large warehousing proposal near Costco, north-east of Elton Way (24/1283/OUTEI, up to 45,000 m²); the industrial and warehousing scheme south of Dagger Lane (25/1108/OUT, up to 17,000 m²); and other relevant commercial schemes. Any developments absent from the original assessment, or whose consent, scale, programme or traffic assumptions have materially changed since May 2026, must be incorporated into an updated assessment.

The same verification is required for the consented battery energy storage system (BESS) off Hilfield Lane (25/0153/FUL), the extension and reinforcement of the Elstree electricity substation, and construction of the new Letchmore Heath substation and associated access infrastructure, including application 25/1463/FUL. These are

substantial projects with potential overlapping construction traffic and HGV movements. Hertsmere should identify precisely whether each was included in ES Table 2.2, and if so on what assumptions, before determining whether the cumulative assessment needs updating.

The cumulative traffic assessment must consider residential, commercial and energy developments together: ordinary car journeys, freight, construction HGVs, servicing and utility works. For the former Mercure Hotel site on the A41, the live data-centre application (25/1781/FUL) should be treated as a principal reasonably foreseeable scenario, rather than relying on the expired and thus unimplementable warehouse permission as an alternative. The assessment should examine overlapping construction periods and the combined pressure on Watling Street, the A41, the Hartspring (Toby Carvery) roundabout, Junction 5 of the M1 and other affected junctions. It must address the existing junction problems identified by the Parish Council's professional study, test whether the May 2026 assumptions remain representative, and update air-quality and noise assessments where necessary. Hertsmere should obtain HCC Highways' substantive assessment before determining the application and also that of National Highways bearing in mind the undoubted additional use of Junction 5 of the M1.

The water-resource review should distinguish Home Farm's domestic demand from other reasonably foreseeable demands, including the A41 data-centre scenario, of that were to be consented. Affinity Water should confirm which cumulative scenarios and drought assumptions have been tested. Thames Water should separately confirm network and treatment capacity, necessary upgrades and delivery triggers.

The applicant's landscape and visual impact assessment identifies significant residual landscape and visual effects, including cumulative effects on the Aldenham Plateau. Hertsmere should test whether the updated cumulative development schedule and revised Regulation 19 pattern alter those findings, including the combined erosion of rural character, public-rights-of-way experience, habitat connectivity and best-and-most-versatile farmland. HCC Ecology's response of 8 October identifies outstanding matters involving protected species, ancient woodland and biodiversity net gain; the necessary evidence and mitigation should be secured and, where appropriate, reconsulted upon before determination.

The application must comply with the Environmental Impact Assessment Regulations and the applicable NPPF cumulative-impact provisions, taking account of the relevant Hertsmere policies on ecology (SADM10), landscape (SADM11), trees (SADM12), water and drainage (SADM13–15 and SADM17), and environmental effects (SADM20), where applicable, and it must be demonstrated that projects have been assessed without omission. The applicant should also justify the use of a 5 km search radius for identifying cumulative schemes and demonstrate that topic specific areas of influence,

including affected transport and infrastructure networks beyond that radius, have been adequately assessed.

The Trust objects to any decision based on a cumulative assessment that is out of date or has not been properly reconciled. Hertsmere must publish the revised evidence, explain the treatment of relevant schemes and consult the appropriate bodies on material changes. Necessary mitigation must be funded, enforceable and timed to meet the impacts of development. These are matters to resolve before permission, not promises to revisit afterwards.

CONCLUSION

For the above reasons, the Trust asks Hertsmere to refuse permission. However if the Council is minded to grant permission the Trust requests that this is not done unless and until the gaps in the evidence are satisfactorily resolved, statutory consultees have had the opportunity to respond to material new information, and the necessary infrastructure, mitigation, funding and occupation triggers are firmly secured. In particular, the Council must address the Green Belt case, the unresolved conclusion of the applicant's Flood Sequential Test, the County Council's ecology concerns, the adequacy and timing of schools and healthcare, highway impacts and water and wastewater capacity. The Council should also require that the applicant demonstrates compliance with the relevant planning policies and satisfactorily addresses the harm and outstanding evidence. In particular, access must not be approved on the strength of unproven traffic assumptions, and housing must not be allowed to outpace the schools, utilities, transport, biodiversity measures and landscape protection on which the proposal depends.

These objections are based on the application documents and consultee information reviewed to date. The Trust reserves the right to make further representations if material information or consultee advice becomes available before determination.

JANET ENGELS

LETCHMORE HEATH VILLAGE TRUST 23 October 2026