TO HERTSMERE BOROUGH COUNCIL AND THE INSPECTOR - LETCHMORE HEATH VILLAGE TRUST -REPRESENTATION IN RESPECT OF HERTSMERE LOCAL PLAN REGULATION 19 OCTOBER 2026

Letchmore Heath Village Trust represents the vast majority of owner-occupiers in the village. We are commenting on the Radlett allocations because their scale and location will affect our shared roads, access to services and surrounding countryside.

1 The Trust position and changes sought

Letchmore Heath Village Trust supports the preparation of an up-to-date Local Plan. Hertsmere needs new homes, and Radlett should make an appropriate contribution. Our concern is the amount and concentration of development proposed around Radlett. In particular, we do not consider that the published evidence adequately justifies the full extent of HRA6, the Northwest Radlett Strategic Urban Extension, or shows how the transport and infrastructure it needs will be delivered.

We ask for the former Regulation 18 HRA SA3 site to be removed from HRA6. This is the land north of Watford Road and east of Kemprow, previously proposed for 972 homes. We understand that the main part belongs to the Crown and the separate western tip to the Church. We support retaining the nearer settlement-edge parcels: Starveacres and adjoining land, and the newly introduced Oakridge and the intervening parcel, subject to assessment of their capacity and the necessary safeguards. This would reduce Radlett's growth and spread development more closely around its existing edge. The Trust's proposed alternative is illustrated in Figure 1 below.

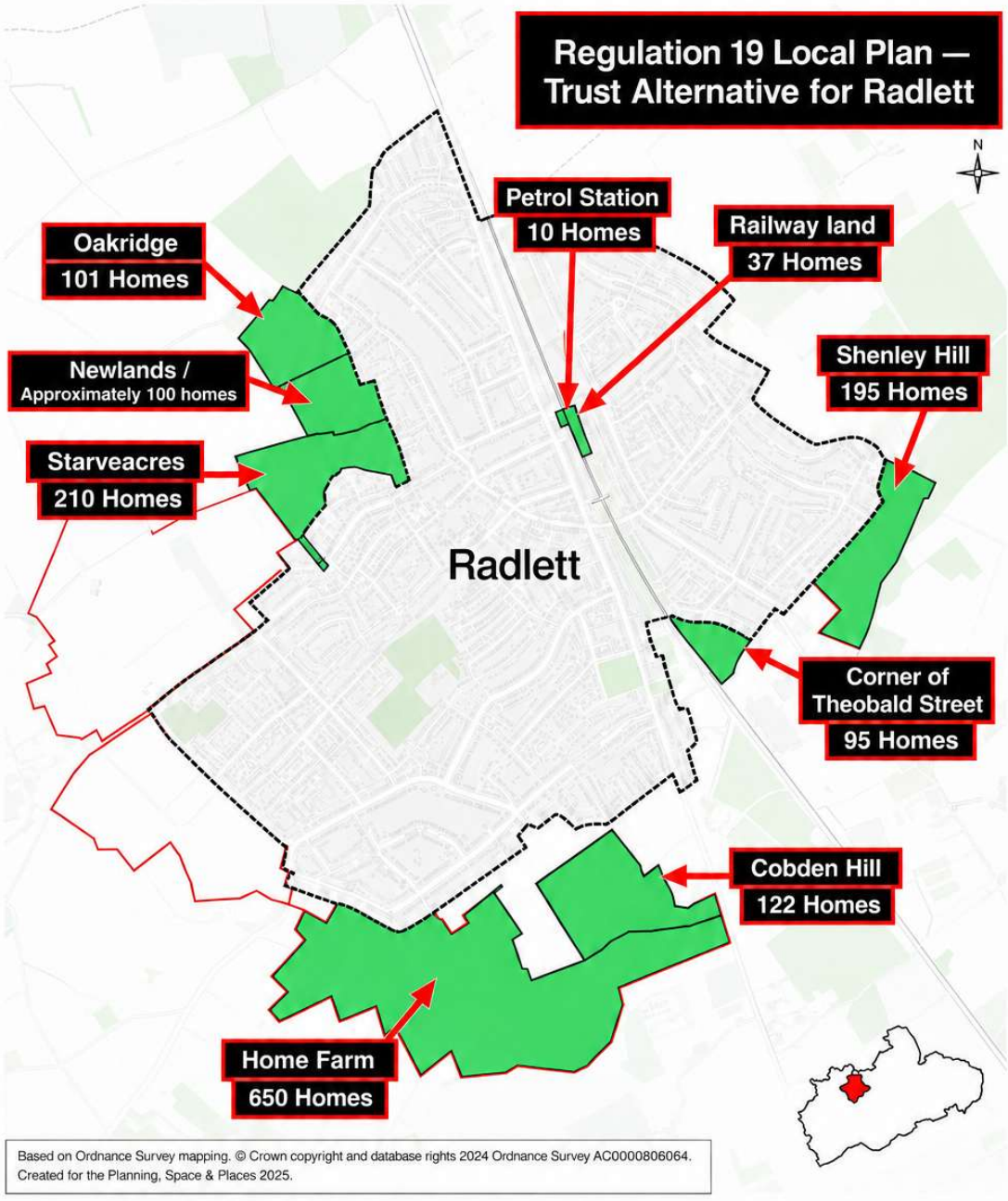
We ask the Council to compare this smaller Radlett option with its proposed allocation and realistic alternatives elsewhere in Hertsmere, while maintaining an adequate borough-wide housing supply. The comparison needs to address access to the centre, the scale and concentration of building, landscape boundaries, the permanent loss of productive agricultural land and the combined demands on infrastructure. There must be a realistic, funded programme for essential infrastructure. Questions that could change which land should be allocated need answers through the Plan, rather than being left entirely to later planning applications.

For the reasons below, we consider that the Plan has not been shown to be justified, effective or consistent with national policy. Those are three of the four tests of soundness. We also question whether the Sustainability Appraisal and Strategic Environmental Assessment have adequately assessed reasonable alternatives. This is a separate legal-compliance issue. We do not suggest that unresolved strategic issues alone establish a breach of the duty to cooperate.

Plan provisions	Principal concern	Modification sought
Chapter 13 spatial strategy and Chapter 17 Radlett vision	Scale and pattern of growth are not demonstrated to implement the plan's stated incremental, character-led strategy	Reassess Radlett growth and its distribution against reasonable alternatives
HRA6 and paragraphs 17.85 to 17.101	Western component, sustainable access, schools, land assembly and infrastructure dependencies	Exclude former Regulation 18 HRA SA3 and assess retention of the settlement-edge balance
HRA3 HRA5 and HRA6 and transport policies	Cumulative transport mitigation and modal shift remain insufficiently demonstrated	Complete and publish the plan-wide evidence and insert specific delivery requirements
Infrastructure policies and allocation requirements	Water, wastewater, health and education provision need reconciliation with the final allocations	Align capacity, costs, providers and phasing; constrain occupation where essential capacity is unavailable
Sustainability Appraisal and site selection	A lower-growth Radlett and redistribution alternative has not been adequately demonstrated to be unreasonable	Appraise an appropriate redistribution scenario and explain the choice transparently

Figure 1 The Trust's proposed alternative for Radlett

Number	Reference	Site name
1	HRA2	Land south of Theobald Street
2	HRA3	Land west of Watling Street (Cobden Hill)
3	HRA4	Land south of Shenley Hill
4	HRA5	Home Farm, Radlett
5	HRA6 less Regulation 18 HRA SA3	Starveacres and adjoining land, Newlands and Oakridge
6	Regulation 18 HRA SA1	Regency House — 10 homes
7	Regulation 18 HRA SA2	Railway Cottages — 37 homes



Trust alternative: indicative parcels and housing figures, subject to boundary and capacity checks. This is an illustrative proposal, not the Council's adopted allocations map.

2 Evidence and national policy framework

We have used the published Regulation 19 Plan and its October 2026 evidence, together with the earlier responses from the Trust, Aldenham Parish Council (APC) and the Radlett Society and Green Belt Association (RSGBA). APC's two Sanderson Associates reports are particularly relevant. The source schedule identifies the documents. Where we use earlier evidence, we have taken account of the revised sites, numbers and policies.

This Plan is being prepared under the legacy system. Annex A paragraph 8 of the August 2026 NPPF preserves examination against the December 2024 Framework, subject to any earlier transitional arrangements that apply. The newer Framework nevertheless applies to planning decisions from publication, and Annex A paragraph 2 addresses policies that are materially inconsistent with it. We recognise that the Inspector must use the correct examination framework. We also ask how the proposed allocations will be delivered under the national policies that will apply when planning applications are decided. [N1]

Our concerns relate to the location of development, transport, infrastructure, Green Belt boundaries and the natural environment. They are principally about whether the chosen strategy is justified and can be delivered. A disagreement about where homes should go does not, by itself, show that the Plan fails the positively prepared test. [S1, Chapters 8, 11, 13 and 17; N3, section 4]

We recognise the Government's request for pragmatism and proportionality when examining viability and delivery. The Inspectorate explains that delivery should be considered over the whole plan period, taking account of changing economic conditions. That is reasonable. It still leaves the need to justify the choice of sites and show how essential infrastructure can be provided. Those are the issues we raise here. [N2]

3 Radlett growth and the stated spatial strategy

Soundness tests Justified and consistent with national policy

Paragraph 17.9 says that Radlett will accommodate more modest and incremental growth than the Borough's larger settlements, with opportunities arising primarily through sensitive redevelopment, infill, small sites and under-utilised urban land. Paragraphs 17.10 and 17.12 describe careful evolution and managed incremental growth. Yet HRA5 proposes at least 650 homes and HRA6 at least 1,573 homes: together 2,223 homes in two strategic extensions. The five principal Radlett allocations discussed in the Sustainability Appraisal total 2,635 homes. The settlement total in the Plan is 2,907, which includes other supply components and should not be confused with the allocation subtotal. [S1; S2, paragraph 5.4.77]

We are concerned both about the total number of homes and their concentration in two large extensions. HRA6 accounts for almost 60% of the five principal allocations; HRA5 and HRA6 together account for about 84%. The Council needs to explain how that fits the distinction in paragraph 17.10 between careful evolution and major transformation. Our smaller option would reduce and disperse growth. The October Key Themes and Priorities report also seeks less through-traffic, a more walkable town and protection of Radlett's scale and character. We ask how the chosen allocations will achieve those aims. [S1, paragraphs 17.9 to 17.12; S7, pages 2, 4 and 7]

The published settlement tables give Radlett 2,900 homes at Regulation 18 and 2,907 at Regulation 19. Borehamwood changes from 8,000 to 4,242 and Potters Bar from 5,000 to 3,369; Bushey changes from 3,000 to 3,214. These figures compare an illustrative earlier strategy with the later supply distribution. They are not a like-for-like comparison of individual sites, and the plan periods and treatment of supply differ. However we ask the Council to explain why Radlett's overall figure has been maintained in light of the transport and infrastructure concerns. [S12, Table 12.1 and paragraph 12.1.10; S1, Table 13.1]

The Settlement Hierarchy Review records 3,522 dwellings in Radlett in 2025. An additional 2,907 would be 82.5% of that figure, although the Census-based area and the Plan's boundaries and supply figures need to be reconciled before treating that as a precise growth rate. We have not chosen a particular limit as an end in itself. Our alternative follows the sites we consider better related to Radlett and suitable for further assessment. The soundness tests do not require equal percentage increases between towns. They do however require evidence to justify this very substantial growth and the additional western extension. [S10, section 4.2 and Table 4-4; S1, Table 13.1]

Change sought: reassess Radlett's housing distribution against a smaller, more contained and dispersed option. Explain the comparative choice of sites and how the resulting growth fits the Plan's objectives. The existence of a railway station is relevant, but so are the distances from the outer parts of HRA6, the lack of step-free access and the capacity of routes and parking serving the station. [S3, printed page 18; L5]

4 HRA6 and the Trust's smaller alternative

Soundness tests Justified and effective

The Sustainability Appraisal provides a specific basis for reconsideration. Paragraph 5.4.68 identifies HRA6 as 1,573 homes, compared with 1,162 across two earlier candidate sites, with additional land nearer the urban edge. Paragraph 5.4.69 records moderate-high landscape sensitivity and unresolved school provision. Paragraph 5.4.70 recalls concern about the western extent, in separate ownership, relating relatively poorly to the settlement edge, particularly if the former site south of Watford Road and west of New Road were omitted. That is the omitted Regulation 18 HRA SA4 site. It must not be confused with Home Farm, formerly HRA SA6 and now retained as HRA5, which is also south of Watford Road. Paragraph 5.4.71 nevertheless retains HRA6 as a constant. [S2, paragraphs 5.4.68 to 5.4.71]

The appraisal supports the benefits of a coordinated development, including the possibility of a secondary school. Those benefits need to be weighed against access, landscape and infrastructure concerns. We do not support allocating homes simply to justify a school. The housing needs its own planning justification, alongside a clear assessment of school demand and provision. The Department for Education's September 2026 Opening New Schools Statutory Guidance expects a minimum of four forms of entry for a mainstream secondary school, while cautioning against blanket assumptions about school size and requiring consideration of viability and cost-effectiveness. Demand and practical travel arrangements also matter. Any local preference for a larger school needs its own evidence. [S2; N5, printed pages 38 to 41]

The preferred exclusion is the whole former Regulation 18 HRA SA3 northern Watford Road site, including its separate western tip. Appendix K distinguishes main Kemprow CFS-2025-133 (HEL379), 35.86 hectares, from HEL-1021-22, 6.25 hectares. The Crown and Church ownership descriptions are the Trust's understanding; the requested change is defined by the former published site boundary rather than ownership alone. The current HRA6 map and historic proforma boundaries should be reconciled to establish the exact amendment and revised capacity. [S9, pages 63 to 66 and 87 to 92; S12, HRA SA3]

Our proposed deletion is wider than the undefined western extent discussed in SA paragraph 5.4.70. That passage does not say that the whole former HRA SA3 site is financially unviable. Our case for removing it rests on the combined evidence about access, scale, landscape boundaries and infrastructure. An owner's preference to develop an entire holding cannot, on its own, justify allocating all of it.

Appendix K page 66 suggests concentrating development on the southern and eastern edges of main Kemprow, nearer Radlett and away from Blackbirds Farm sewage works. It also records the need for M1 Junction 5 modelling, local junction capacity problems and the inability of Oakridge Avenue in its current form to accommodate additional vehicle movements. This evidence reinforces the need for a reasoned assessment of the site's extent and suitability. The Trust's requested outcome remains exclusion of the former HRA SA3 component, with the nearer settlement-edge land retained. [S9, pages 65 to 66]

The SA's landscape appraisal identifies the sensitive landscape west and south-west of Radlett and retains concern about containment of the western extent. The Stage 2 Green Belt findings do not resolve that separate issue. The Council should show how the selected extent would create a durable boundary and assess this against retaining the balance of HRA6 while omitting former Regulation 18 HRA SA3. [S2, paragraph 6.13.5; S6]

The rest of HRA6 includes Starveacres and adjoining land, Oakridge and the intervening settlement-edge parcel, not separately named by the Council but which we refer to in this submission as Newlands. Appendix K assesses CFS-2025-175, HEL-0231-22 and CFS-2025-194 separately. These parcels are closer to the existing settlement and should be considered on their own merits. If the Council considers that they cannot proceed without the main Kemprow land, it should explain the particular access, infrastructure and delivery issues. The boundary and current capacity of Newlands still needs to be reconciled. Historic estimates alone cannot establish how many homes could now be delivered. [S9, pages 67 to 80]

SA paragraphs 9.17.4 and 9.17.5 say that site policies are relatively high level and identify further work on HRA6's masterplanning, schools, viability and land equalisation. Development is expected to start within five years. Requiring partnership working in paragraph 17.88 does not show that the necessary agreements are in place. School provision also needs to be reconciled with existing places and the housing distribution. The Council needs to show how planning, land agreements and essential infrastructure will allow early homes to be occupied. [S1, paragraph 17.88 and Appendix 5, PDF page 682; S2, paragraphs 9.17.4 to 9.17.5]

Change sought: assess a smaller HRA6, removing former Regulation 18 HRA SA3 and retaining the suitable settlement-edge parcels that can be delivered independently. Define the SA's western extent, reconcile the 68.81-hectare allocation with its constituent sites and establish realistic developable areas and capacities. Explain the consequences for access, schools, infrastructure, viability and delivery dates, then amend the allocation, Green Belt boundary and policy requirements accordingly. The possibility of a secondary school should not stand in for justification of the housing strategy.

5 APC traffic survey and cumulative transport effects

Soundness tests Justified effective and consistent with national policy

APC commissioned Sanderson Associates to prepare the Transport Technical Note, reference 402338-001-02, final issue dated 29 May 2026. It uses manual classified traffic counts and queue observations undertaken on 6 May 2026, junction modelling and 2031 forecasts including identified committed developments. The assessed junctions are Watling Street with Harper Lane, Park Road, Shenley Hill and Theobald Street; Elstree Hill North with Watling Street and Allum Lane; High Street with Watford Road and Barnet Lane; and the A41 Hartspring roundabout. [L2, sections 2 and 3]

Section 3.9 concludes that all assessed junctions show capacity issues in the 2026 base scenario, with most arms exceeding practical capacity, and that committed development and traffic growth exacerbate these problems. In particular, the note identifies all arms at Park Road and Hartspring above the practical reserve threshold, two arms at Shenley Hill above it, and capacity problems at Theobald Street, Allum Lane and the signalised junctions. Section 4 also estimates additional trips from the then candidate allocations. [L2, sections 3.2 to 3.9 and 4]

The APC survey was undertaken in a bank-holiday week, with temporary signals on Theobald Street. The report notes that this could produce a conservative picture. Its candidate sites and 2031 forecasts need updating for Regulation 19 and the proposed mitigation. Even with those limitations, it provides measured and modelled evidence of existing congestion that the Council should address. The assessment must show what effects would remain after realistic mitigation and apply the relevant national policy tests. [L2]

The published July 2026 AECOM Transport and Movement Assessment says in section 5.1.11 that site mitigation has not yet been considered. Section 6.1.1 says COMET modelling will follow before submission. IDP paragraph 4.1.14 says the transport and water workstreams are still being developed and that the relevant proformas and project schedule have not been updated to the latest housing proposals. SA paragraph 6.15.2 also records continuing transport work and considerable uncertainty. We ask for the completed evidence showing how the actual Regulation 19 sites and housing numbers can be accommodated. [S3; S4; S2, printed page 66]

The IDP records National Highways' concerns about capacity at M1 Junction 5 and pressure on the motorway between Junctions 4 and 6. The Radlett allocations and other developments using these routes need to be assessed together. Removing a site elsewhere does not remove the traffic from the development that remains. [S3, printed pages 14 to 15]

The cumulative transport assessment should also explain how it accounts for SEGRO Logistics Park Radlett on the former aerodrome, including construction activity overlapping with the proposed housing developments. Although operational freight HGVs are intended to use the A414, with restrictions on routes south towards Radlett, this does not establish that other traffic associated with the development will avoid Radlett. The assessment should address employee and van movements, traffic displaced by congestion or roadworks, and the routing controls and enforcement arrangements relied upon.[L17]

Change sought: complete and publish a calibrated cumulative assessment of the Regulation 19 allocations, addressing the APC counts and forecasts, committed development, relevant neighbouring growth, employment and major infrastructure projects, and the shared A41 and motorway approaches. This must cover Aldenham parish as a whole, including its villages and narrow country lanes. St Albans adopted its new Local Plan on 9 September 2026. Its allocation B8, Harper Lane north of Radlett, provides for an indicative 274 homes and requires improvements or contributions for the B556/A5183 junction because of capacity and constraints. Its effects must be included in the relevant cumulative scenarios. Test evidence-based modal shift and phasing scenarios; identify feasible mitigation, costs, land, delivery bodies and dates; and reduce or remove allocations where the effects or delivery dependencies cannot be satisfactorily resolved. [L2; S3; N6]

The allocation policies already require work with the highway authority and cumulative assessment at masterplanning stage, including paragraphs 17.78 and 17.95. We welcome that. But the Plan first needs to show a reasonable prospect that the selected amount and distribution of development can be accommodated. Later applications can then settle the detailed design of workable improvements. We are asking for the strategic evidence, not every junction drawing, before adoption. [S1; S4]

6 Accessibility and sustainable travel

Soundness tests Effective and consistent with national policy

APC's companion Sanderson report, Accessibility by Sustainable Travel Modes, is dated 29 May 2026. It was supplied as 402338-002-03-1.pdf, although its printed reference is 402338-001-03. It assesses the former candidate sites, so its findings need to be related carefully to the current boundaries. Its old site numbers differ from both AECOM's transport proformas and the current HRA policies. [L3]

APC's accessibility report gives a route of about 1.7 km to Radlett station from the former northern Watford Road site, compared with 900 metres from the former Starveacres frontage. Those are distances from the assessed starting points, not from every proposed home. It identifies shops at Battlers Green Drive. From our local knowledge, that is a limited parade with 2 takeaway hot food shops, a hairdresser, a post office/newsagent and a small supermarket with limited fresh food. It lacks the range of a town centre, including a pharmacy, bakery, greengrocer or butcher. It should not be assumed to meet all residents'

everyday needs. Battlers Green Farm Shopping Village is a different destination, with specialist food, lifestyle, creative and artistic businesses. Its fresh food offering is at premium prices, but it is not a comprehensive local centre. The assessment needs to consider the actual shops and services, the routes to them and the journeys residents are likely to make. [L3, section 2.4, Table 5, and section 2.8; L8]

AECOM's proforma for the former 972-home northern Watford Road site HRA SA5 identifies good relative access by car, poor relative access on foot and a risk of high car dependence. Access improves towards its eastern boundary, nearer Radlett. The bus figure relates to the 602 service, at about two vehicles an hour in the weekday peak; APC also identifies a school service. This needs to be tested against actual destinations, operating hours and usefulness to residents, particularly as development extends westwards. AECOM calls this historic proforma HRA SA5; it is not the current HRA5 Home Farm allocation. [S4, PDF pages 384 to 393; L3]

AECOM estimates about 530 two-way AM-peak vehicle trips and 4,776 daily trips for the former 972-home scheme. APC's separate indicative calculation gives approximately 510 AM-peak and 507 PM-peak trips. These are alternative estimates, not figures to add together, and demonstrate the scale of traffic requiring updated cumulative testing. AECOM identifies the B462 route west to M1 Junction 5; Appendix K records HCC's modelling requirement there; and the IDP identifies existing motorway constraints. [S4, PDF pages 387 and 391; L2, section 4 and Table 9; S9, page 66; S3, pages 14 to 15]

APC's Home Farm assessment records limited nearby services, bus stops about 1,400 metres away and a station route of about 1.9 km under the layout it assessed. HRA5 now proposes at least 650 homes and future access improvements. The adjoining HRA3 allocation adds 122 homes at Cobden Hill, so their combined demand and coordinated access need to be assessed. For the Home Farm application, 26/1236/OUTEI, and the Plan, a bus route or stop needs to come with practical commitments: destinations, frequency, operating hours, start date, funding and arrangements to keep the service running. [L3, section 2.7; S1, paragraphs 17.43 to 17.44 and 17.72]

The IDP records that Radlett station is not step-free and is not currently on the Department for Transport's investment priority list. The October Key Themes report supports improvements. If the Plan relies on them, it needs a realistic funding and delivery programme. Our experience of the station car park filling early on weekday mornings also points to the need to assess access and parking capacity. Safe routes and reliable connections matter, especially for people who cannot walk or cycle to the station. [S3, printed page 18; S7, page 4; L5]

The same 2021 Census measure allows a useful comparison of car availability. In Hertsmere 005 (E02004900), the census area covering Radlett, 270 of 3,188 households had no car or van: about 8.5%. Some 1,750, or 54.9%, had two or more. Across England and Wales the corresponding figures were 23.3% and 35.4%. The census area is not necessarily identical to the Plan's Radlett boundary. These figures do not dictate future behaviour, but they are relevant when testing whether residents will realistically be able to use alternatives to the car and whether it is realistic to believe a modal shift in transport is possible [L13]

The balance between homes and jobs also needs to be reflected in the transport assessment. Table 13.1 identifies 9,500 square metres of gross employment floorspace for Radlett, alongside 2,907 homes. It identifies much larger employment totals for Borehamwood (150,000 square metres), Potters Bar (219,000) and Bushey (88,000). These are floorspace figures, not job numbers, and do not on their own measure whether a settlement is self-contained. Radlett does have an existing local employment area at Beaumont Gate, a small office development off Shenley Hill beside Radlett station, protected through the employment policies. HRA1 also supports small workspaces, maker spaces, creative businesses and other local employment in the centre. We therefore do not suggest that the Plan provides no employment opportunities but question how much employment will be available locally for the projected large population increase. [S1, Table 13.1, employment hierarchy, EC6 and HRA1 B(vii)]

The Plan recognises Radlett's limited range of employment opportunities in paragraph 17.1 and residents' use of jobs and services in nearby centres in paragraph 17.8. The Council should explain where the 9,500 square metres will be provided, the jobs it is expected to support and how this relates to the proposed housing growth. Many new residents will need to travel outside Radlett for work. Rail and homeworking can meet some needs, but journeys to workplaces poorly served by rail or bus are likely to involve cars. The modelling should test realistic work destinations, access to the station, cross-town journeys and bus connections, rather than assume that a station or small local workspaces will remove outward commuting. [S1, paragraphs 17.1 and 17.8, Table 13.1 and HRA1]

Change sought: set out achievable walking, cycling, crossing and bus improvements, including service standards, who will provide them and when. Essential alternatives to driving should be available from first occupation. Test assumptions about reduced car use against local car availability, existing journeys and the distances from new homes to services. If step-free station improvements cannot be relied on, test the sites without them. Any further national comparison should use verified, comparable data.

7 Infrastructure and when it will be provided

Soundness tests Effective and consistent with national policy

The Trust, APC and RSGBA raised infrastructure concerns at Regulation 18. The October IDP adds some evidence, which we have considered. However this is not comprehensive. Paragraph 4.1.13 says requirements have been reviewed against the latest allocations, but paragraph 4.1.14 identifies transport and water work that has not yet been fully brought into line. Paragraph 8.2.1 also says funding information is limited and will be developed further. This is unsatisfactory. We ask for those gaps to be resolved for the published housing proposals. [L1; L4; L5; S3]

Schools and healthcare

HRA6 paragraph 17.97 leaves school requirements to future agreement. The SA identifies unresolved school capacity and viability questions. We seek an agreed education strategy for existing residents and new development, rather than housing allocated to obtain a school. Home Farm's applicant proposes a one-form-entry primary school with nursery and land for expansion to two forms. Its August 2026 education report records differences with HCC about the scale of provision, contributions and additional secondary and SEND places. These are the applicant's views, not an agreed HCC assessment. The Plan needs to reconcile the differences and explain where under 11 years old children from the first occupied homes will go to school if on-site provision opens later and where older children will go to school from the first occupied homes. [S1, paragraph 17.97; S2, paragraphs 5.4.69 and 9.17.4 to 9.17.5; S3; L10, paragraphs 5.18, 5.22 to 5.33 and 8.1 to 8.2]

The IDP's forecast surplus of two secondary forms of entry by 2032–33 covers Radlett and Bushey together. It does not mean that those places are within Radlett. Its theoretical requirements from growth have not been reconciled with the forecast spare places or shortfalls. The strategy should identify schools and places for each phase, including SEND demand, admissions and movements across boundaries. Where pupils will travel outside Radlett, it should show safe and practical routes, journey times, public transport and any funded school travel arrangements. That assessment should help determine the housing allocations and delivery dates. [S3, printed pages 60 to 62; N5]

HRA6 requires coordinated masterplanning under paragraph 17.88 and DM3. Our request for that work should not be taken as support for the whole allocation. The education and infrastructure assessment should compare the full proposal with our smaller option and show the land, access, funding and delivery arrangements needed for each. [S1; S2, paragraphs 9.17.4 to 9.17.5]

Essential services need to be available from the first occupation, through existing capacity or timely new provision. Healthcare planning should cover GP services, community and clinical care, and relevant hospital capacity, with advice from the responsible NHS bodies. Money or reserved land alone does not show that a

service will be staffed and open. We ask for the additional demand, existing capacity, funded improvements, access and delivery dates to be identified for each phase.

Water resources and wastewater

The IDP records spare capacity in the Colne water-resource zone at present. It also forecasts that this margin will reduce by 2030, with longer-term pressure from climate change, lower environmental abstraction limits and growth. It identifies leakage reduction, demand management and transfers as responses. The Council needs to show that these measures and any local network works can support the actual housing and employment proposals when they are due to be built, also taking account of the very substantial consented commercial and industrial development in the locality. [S3, printed pages 32 to 35]

SA paragraph 6.16.2 says that proposed growth exceeds the assumptions in the water company's Water Resources Management Plan. It nevertheless reports no major water-supply concerns over the plan period. We ask how those positions have been reconciled: what updated demand figures, supply measures and provider confirmation support the reassurance? The SA discusses data centres under employment and energy, but that does not demonstrate a quantified assessment of their water demand alongside the housing allocations. [S2, sections 5.2 and 6.16.2; S3] These concerns are particularly pertinent given that, on 5 November 2026, Hertsmere's Planning Committee voted to defer determination of the proposed data centre development at the former Mercure Hotel site (25/1781/FUL). The deferral was on all grounds. During the debate, councillors raised concerns including the adequacy of water supply and the absence of confirmation from Affinity Water that the development's requirements could be met. This further underlines the need for a robust assessment of cumulative water demand arising from both housing and major employment developments proposed within the borough.

The Environment Agency's Colne abstraction licensing strategy records no water available for additional licensing across the four assessed flow categories at its twelve assessment points and closes the unconfined chalk aquifer to new consumptive licences. These constrain new abstraction, rather than prohibit mains connections. The evidence should show how all proposed sites can be supplied through lawful existing resources, transfers, demand reductions or other measures, with realistic dates and protection of river flows. The same test must be applied to redistribution alternatives. [S11, sections 3.3, 3.6 and 4.2]

SA paragraph 6.16.2 records concerns about Maple Lodge treatment capacity and says that a final Water Cycle Study is still being prepared. Its strongest adverse finding concerns higher-growth scenarios, but the preferred Plan also needs a completed assessment against its delivery timetable. The Council should identify each allocation's treatment catchment and network, then assess the combined residential and commercial wastewater demand, including relevant construction activities and discharge routes. Maple Lodge's regional role does not establish that every Radlett site drains to it. [S2, paragraph 6.16.2; S3]

The IDP records Maple Lodge's dry-weather-flow permit as 130,000 cubic metres per day and assessed Q80 flow as 139,326, approximately 107% of that permit, with AMP8 upgrades proposed by March 2030. It separately records Blackbirds at approximately 74%. The final evidence must reconcile these different catchments, revised growth and upgrade dates. For homes expected early in the trajectory, it must demonstrate capacity before any relied-upon upgrade is operational. [S3, printed pages 37 to 38; S1, Appendix 5]

The Plan already expects Thames Water upgrades before occupation in paragraphs 17.82 and 17.100, and infrastructure phasing in paragraphs 17.74 and 17.91. We support those requirements. However, they still need evidence showing the works required, their capacity and when they can be completed. The final water study and delivery schedule should identify the sites served and the occupations that can safely be supported. Strengthen the requirements where necessary and bring the housing timetable into line. [S1; S3]

The assessment should use realistic assumptions about climate change, drought, abstraction reductions, leakage, per-person consumption, transfers and major non-domestic demand. Water-efficiency targets

need an evidenced delivery, monitoring and maintenance basis, supported by sensitivity tests for higher consumption or delayed savings. The Home Farm Energy and Sustainability Statement calculates 104.2 litres per person per day from its proposed fittings. But Affinity's 2024–25 Annual Performance Report records company-wide household consumption of 153.9 litres per person per day for that year. These are different measures: a new-build design calculation and observed consumption across the existing supply area. Their difference does not prove the proposed fittings will fail, but it reinforces the need to demonstrate realistic demand, deliverable savings and resilience if performance falls short. [S3; L11, printed page 16, PDF page 17; L12, PDF page 39, printed pages 74 to 75]

We ask for the water studies to be completed and brought together, with clear positions from providers and regulators, before the dependent allocations are treated as justified and deliverable. Policies should link occupation to available supply and treatment capacity and explain what happens if improvements are delayed. This concern arises from the current Plan and evidence; it does not depend on an unverified comparison with the 2011 appraisal. [S2; S3, paragraph 4.1.14]

The IDP recognises potentially significant data-centre water demands. Allocation HBUSA11 allows approximately 138,000 square metres at the former Mercure Hotel and records application 25/1781/FUL for approximately 137,410 square metres consideration of which was deferred by the Planning Committee on 5 November 2026. The applicant has not established the final cooling method: the committee report paragraph 7.164 records that cooling methods were not yet set. The Council's original Climate Change response calculates 764 million litres per year using evaporative cooling, a water-usage effectiveness of 0.4 litres/kWh and electricity use of 1,910 GWh/year, comparing this with the domestic requirements of around 15,000 residents. The follow-up response of 28 May questions whether this represents best practice and identifies lower-water cooling alternatives. This is a scenario-dependent estimate, not confirmed consumption for every cooling technology. Uncertainty about the eventual occupier does not establish a reliable water-demand assumption for the Plan. The evidence should assess a credible range of demand and demonstrate adequate capacity, or secure a lower-water operating limit on which delivery can safely rely. Water supplied, water evaporated and wastewater discharged must be distinguished. [S3, printed page 34; S1, HBUSA11; L9] Whilst revised figures were given in the update sheet prior to the Planning Committee meeting these have not been verified by the Climate change office and the Trust is concerned that last minute conditions are too permissive.

Construction-phase water demand also needs consideration where major projects overlap. The Trust identifies the Elstree substation extension and new Letchmore Heath substation, largely proceeding through permitted-development routes, with related works under application 25/1463/FUL; Hilfield Lane battery storage, 25/0153/FUL; Brian's House stroke clinic at Hilfield Lane, 25/1842/FUL; approximately 45,000 square metres of warehousing near Costco, 24/1283/OUTEI; warehousing at the Animal Sanctuary, 23/1731/FUL; and approximately 17,000 square metres of warehousing at Dagger Lane/A41, 25/1108/OUT. These references identify the schemes; the final cumulative assessment should establish their permissions or other authorisations, relevant programmes and shared infrastructure demands. The proposed former Mercure data centre (25/1781/FUL), referenced above must be identified separately, particularly given the concerns raised about the adequacy of water supply and the absence of confirmation from Affinity Water. We seek a proportionate assessment of combined construction and operational water demand and wastewater arrangements, including any overlapping peaks and practical water-saving measures. We do not assume identical demand or discharge routes for every project. [N7; L9; L14]

Major infrastructure and a data centre do not automatically entitle Radlett to a housing-target discount. However they do need to be included when assessing combined demand, environmental effects and infrastructure capacity in Radlett and the rest of Aldenham parish.

Viability and delivery controls

The viability assessment includes infrastructure allowances, with £40,000 per dwelling on greenfield strategic sites, and tests different costs. Paragraphs 8.42 to 8.43 also acknowledge uncertainty and the

need for continued engagement. We recognise that this work has been done. Our concern is whether the actual transport, healthcare, education, water and other costs for each allocation fit its assumptions, affordable housing requirements and developable area. That needs to be demonstrated before relying on its full delivery. [S5, paragraphs 8.42 to 8.43]

Change sought: publish an infrastructure schedule for the Radlett allocations and our smaller alternative, identifying capacity, cost, providers, funding and dates. Essential services should be available from first occupation, using existing capacity or completed improvements, with further provision ahead of later phases. Strengthen occupation controls where necessary, align the housing timetable with the works and reduce development where essential capacity has no reasonable prospect of delivery. [S1; S3; S5]

8 Green Belt landscape farmland and other effects

Soundness tests Justified and consistent with national policy

We have considered the October Stage 2 Green Belt study. A description of land as provisionally grey belt does not remove it from the Green Belt. The choice of location and scale still needs to be justified, taking account of landscape, heritage, ecology, infrastructure and the Green Belt that remains. The label alone cannot settle the site's suitability or capacity. [S6; S1, Chapter 8]

The identification of grey belt is not the whole assessment. The Council should also demonstrate how the proposed releases, considered together, would affect the remaining Green Belt's ability to safeguard the countryside from encroachment and maintain separation between settlements. That assessment should compare the full HRA6 allocation with the Trust's smaller alternative.

Paragraphs 17.86 and 17.96 rely on reinforced hedgerows to form enduring northern and western boundaries to HRA6. The SA nevertheless expresses concern about its western extent and records moderate-high landscape sensitivity. We ask for the revised site boundaries and combined development effects to be assessed, showing how separation and a lasting landscape edge would be achieved. Future planting should not simply be assumed to provide them. [S1; S2, paragraphs 5.4.69 to 5.4.71 and 6.13.5]

Agricultural quality also matters. Development would permanently remove land from agricultural use, reducing its availability for future food production. This deserves explicit consideration when choosing between sites.

The photograph supplied through the farmer shows Grade 2, 3a and 3b land on a map described as covering much of main Kemprow. We do not have the original report, its date, a verified survey boundary or areas by grade. We therefore do not claim that the entire allocation is best and most versatile land or put a figure on its loss.

We ask the Council to use proportionate evidence to identify the quality of the land and compare losses between reasonable alternatives. That comparison should address the combined loss across the allocations and explain whether housing needs could be met with less loss of higher-quality agricultural land. [L6; S2, section 6.14]

Landscape, heritage, flooding, wildlife, protected trees, public rights of way and the combined effects on Radlett and nearby villages should be considered together. The Plan needs to show that the necessary buffers, protection and infrastructure can fit alongside the assumed homes. Detailed masterplanning can develop that work, but should not be relied on to resolve a fundamental uncertainty about capacity.

Change sought: assess a smaller HRA6 and identify the lasting Green Belt boundary, protected areas and justified housing capacity on the Policies Map. Assess the combined effects of release, including settlement separation and the Green Belt and villages that remain. Provide the agricultural, landscape and other evidence needed to compare the options. Provisional grey-belt classification does not, by itself, justify the amount or location of development.

9 Reasonable alternatives and environmental assessment

Soundness tests Justified with a separate SEA legal compliance concern

The Trust's Regulation 18 submission contained a mapped dispersed alternative totalling 1,090 indicative homes, described as around 1,100. The current alternative reflects the later allocations and land availability: retain HRA4 Shenley Hill 195, HRA2 Theobald Street 95, HRA3 Cobden Hill 122 and HRA5 Home Farm 650, a subtotal of 1,062. Within HRA6, retain Starveacres, and adjoining land, Oakridge and the intervening parcel Newlands while excluding former Regulation 18 HRA SA3. Add back in the 2 town centre sites former petrol station HRA SA1 and railway land HRA SA2 but now at a slightly lower number, keep former HRA SA4 omitted. Hill Farm is not counted because SA paragraph 5.4.75 records its latest unavailability. [L1, pages 3 to 5; S2; S12]

Working schedule using published site references

Published reference or location	**Preferred treatment**	**Capacity status**
HRA4 Shenley Hill	Retain	195
HRA2 Theobald Street	Retain	95
HRA3 Cobden Hill	Retain	122
HRA5 Home Farm	Retain with safeguards	650
Former HRA SA4 south of Watford Road and west of New Road	Keep omitted	Not counted
Former HRA SA3 north of Watford Road and east of Kemprow	Exclude from current HRA6	Former 972 is not a verified current deletion yield
Starveacres and adjoining land within HRA6	Retain subject to assessment	Historic Trust 210; Council 190
Newlands being the intervening parcel between Starveacres and Oakridge within HRA6	Retain subject to boundary and capacity assessment	Approximately 100 remains unverified
Oakridge within HRA6	Retain subject to assessment	Historic 101
Hill Farm	Not relied upon as available	Not counted
Former petrol station and railway land	Reinstate and retain	10 plus 37 equals 47

Consultation Statement paragraph 6.4.7 records our dispersed alternative and concerns about the overall choice of sites. Recording what we said is not the same as assessing that alternative. SA paragraph 5.4.77 concludes that there is no clear reasonable lower-growth Radlett option and carries principal sites forward unchanged. The borough-wide scenarios then vary additions elsewhere, including North Bushey and Well End, while keeping the Radlett package fixed. We ask for a comparison that directly tests our smaller Radlett option explained in this submission. [S8; S2, sections 5.4 and 6.1]

The two town-centre sites have not disappeared from the supply figures. SA paragraph 5.4.62 counts 47 homes through the HELAA: 10 at the former petrol station and 37 on railway land, rather than the earlier 20 and 37. Those 47 should be retained without counting them twice. Any additional capacity needs supporting evidence. [S2, paragraph 5.4.62]

For illustration, the Trust's historic 210 for Starveacres and adjoining land, and 101 at Oakridge together now with approximately 100 for the intervening parcel Newlands total 411. The Council's former Starveacres figure was 190, giving 391 instead. Neither total is a verified current capacity for the retained HRA6 land. Nor does subtracting the former 972 from 1,573 establish a deliverable retained yield of 601. Current capacities must follow assessment of the actual boundaries, constraints, access and infrastructure. [L1; S2, paragraph 5.4.68; S9]

Adding 1,062, the illustrative retained HRA6 figure of 411 and current central supply of 47 gives 1,520; using 391 gives 1,500. These are component subtotals. The comparable published subtotal is 2,635 principal allocations plus 47 central supply, or 2,682. A further 225 separates that subtotal from the 2,907 settlement headline and must be reconciled. Holding those 225 unchanged would give an illustrative alternative settlement total of 1,745 or 1,725, approximately 49.5% or 49.0% of the review's 3,522-dwelling baseline. These are working comparisons, not a verified final capacity or arbitrary percentage cap. The illustrative reduction is 1,162 or 1,182, rather than automatically 972. [S1; S2; S10]

We formally submitted an alternative at Regulation 18, and the Council records it in Consultation Statement paragraph 6.4.7. It included Theobald Street and Cobden Hill, now HRA2 and HRA3. We ask the Council to explain how it assessed the further sites newly introduced at Regulation 19 against consistent suitability, availability and infrastructure criteria. We rely on the submission itself, rather than separate correspondence. The appendix reproduces the historic map to explain the earlier proposal alongside our updated position set out at the start of this submission. [L1; S8]

The SA already identifies reasonable alternatives worth comparing: 292 homes north of Borehamwood, 700 at North Bushey/Compass Park and 1,200 west of Well End Road. Each has constraints as well as possible benefits. North Bushey has relatively limited landscape sensitivity and potential for a lasting edge, but weaker connectivity and shared M1 Junction 5 pressures. North Borehamwood has a Local Wildlife Site and sprawl concerns. Well End needs coordinated access and infrastructure and raises concerns about distance from the centre and a lasting boundary. We ask for a fair comparison of substitution options, rather than automatic allocation of an omitted site. [S2, paragraphs 5.4.20 to 5.4.25, 5.4.54 to 5.4.57, 6.13.3 to 6.13.5 and 6.15.3]

The housing supply margin is small. Appendix 5 provides 16,892 homes against a requirement of 16,575, leaving 317. SA paragraph 6.17.6 also identifies risks to the early rolling five-year supply. Our illustrative 1,162-home reduction would exceed that margin by 845 if nothing else changed. This is an illustration, not a verified current yield for the land to be removed or a new housing requirement. A revised strategy needs realistic replacement provision, or another justified adjustment, and achievable delivery dates. It should not lead to allocating an unsuitable replacement simply to make the numbers add up. [S1, Appendix 5, PDF page 682; S2, paragraphs 6.17.5 to 6.17.7]

Cowley Hill is now the subject of a live outline application for up to 994 homes (26/1501/OUTEI), including the 154 homes proposed under application 26/1164/FUL. Although outside the Regulation 19 allocations, this proposal should be assessed as an alternative source of housing that could reduce the need for development elsewhere, allowing the reduction in the scale of HRA6 in Radlett sought by the Trust. The applications may be determined independently of the Local Plan; their potential contribution should therefore be considered when assessing reasonable alternatives. [S2, paragraphs 5.4.20 and 5.4.25; L15]

The SA's seven scenarios add homes elsewhere while keeping Radlett unchanged. Section 7 principally compares the preferred approach with higher total growth; it identifies greater confidence in delivery as the clearest reason for extra supply. That does not directly answer whether a different distribution at a

similar borough-wide total would be better. Using the provisional 1,162 reduction only to illustrate the point, substituting Well End's 1,200 would give 16,930 homes; North Bushey plus North Borehamwood would give 16,722. Both exceed the 16,575 requirement, but the latter leaves only 147 spare homes. Neither calculation proves a suitable or deliverable strategy. The comparison needs to address environmental effects and early delivery as well as totals. [S1, Appendix 5; S2, sections 6.1 and 7]

APC and RSGBA asked at Regulation 18 for more homes from Bowmans Cross within the plan period. Regulation 19 has increased that contribution, so the earlier concern about counting only 500 homes has been overtaken.. [L4; L5; S1]

The 2004 Environmental Assessment Regulations require assessment of likely significant environmental effects and reasonable alternatives within the Plan's objectives and geographical scope. We question whether the alternatives have been adequately assessed. We are not treating that concern as a proven legal breach before the full appraisal and site-selection record have been tested. If the Council considers our alternative unreasonable, we ask it to explain why and identify the evidence. [N3]

Change sought: assess a smaller, more dispersed Radlett option, retaining the suitable settlement-edge parts of HRA6 and removing former Regulation 18 HRA SA3, with realistic replacement provision elsewhere. Compare the combined environmental effects, infrastructure, capacity and delivery dates with the published Plan. Explain the reasons for choosing or rejecting the options, amend policies, maps and housing delivery figures where needed, and undertake the further environmental assessment and consultation required.

10 HRA5 Home Farm and the Council resolution

We do not seek removal of HRA5 Home Farm through this representation. Its reduction from the earlier 1,040 homes to at least 650 is recognised, and we seek effective transport, infrastructure, landscape and environmental safeguards. Its separate application must be decided on its own evidence and merits. A pending application or housing-supply shortfall does not make permission inevitable. If permission is granted, its homes and mitigation should be reflected accurately in the Plan's supply and cumulative assessment, without double counting.

The Council's publication webpage says that the Plan will return to Full Council before submission, following consideration of the responses. We also understand that environmental screening under Regulation 9(1) was specifically raised. This is not an admission that the Plan is unsound, nor a finding that its environmental assessment is adequate. We ask the Council to address the substantive appraisal concerns raised here and publish any determination, further assessment or consultation required before proceeding. [N4; N3; L16]

11 What we ask the inspector to do

We ask for former Regulation 18 HRA SA3 to be removed from HRA6, including the main Crown component and separate western tip understood to belong to the Church. We support retaining Starveacres and adjoining land, Oakridge and the newly introduced intervening settlement-edge parcel, Newlands, subject to assessment. We seek completed transport and water evidence, effective infrastructure requirements and a reasoned comparison of our smaller Radlett option with realistic alternatives elsewhere. We do not seek deletion of Home Farm through this representation.

If appropriately assessed and consulted modifications cannot resolve these matters, the affected allocations should not be recommended for adoption in their current form. A submission deadline does not justify the choice of sites or resolve delivery problems.

The Trust asks to take part in the relevant examination hearings because we seek changes and wish to explain our alternative. We would address Radlett's housing distribution, the HRA6 boundary and

alternatives, cumulative transport, infrastructure and environmental effects. We will make the hearing request on the Regulation 19 form. The inspector will determine the hearing arrangements. [N4; N3, section 5]

Sources

References below identify the documents relied upon. Printed page numbers are used where specified. Earlier representations are supporting material and do not replace the current response or current evidence. S identifies the Local Plan and supporting strategic evidence; N identifies national policy, legislation and guidance, together with other policy sources; L identifies local submissions, planning application documents and other supporting material. The letters and numbers are our reference labels used throughout this submission.

S1 Hertsmere Local Plan Regulation 19, published October 2026. Chapters 13 and 17; HRA5 and HRA6; HBUSA11.

S2 Hertsmere Local Plan Sustainability Appraisal Report, October 2026. Paragraphs 5.2.44 to 5.2.48, 5.4.63 to 5.4.77, sections 6.1, 6.14, 6.15 and 6.16, paragraphs 9.17.3 to 9.17.6.

S3 Infrastructure Delivery Plan Regulation 19, revision V4 dated 7 October 2026. Paragraphs 4.1.13 to 4.1.14 and 8.2.1; transport, water, education and health sections and project schedule.

S4 AECOM Hertsmere Transport and Movement Assessment, July 2026, final revision dated 23 July 2026. Main report sections 5.1 and 6.1, and accompanying site proformas. Northern Watford Road 972-home proforma HRA SA5, PDF pages 384 to 393 of e14-hertsmere-transport-and-movement-assessment-proformas. These are historic proforma identifiers and capacities.

S5 Hertsmere Whole Plan Viability Assessment, published with the Regulation 19 evidence; report headed August 2026. Paragraphs 8.42 to 8.43 and associated sensitivity testing.

S6 AECOM Hertsmere Green Belt Assessment Stage 2, final October 2026. Relevant former Radlett site assessments, read against current allocation boundaries. Grey-belt findings do not determine all other planning considerations.

S7 Radlett Key Themes and Priorities Report, October 2026, particularly pages 2, 4 and 7 on character, movement, accessibility and sustainable growth. These are the passages relied on here.

S8 Hertsmere Regulation 18 Consultation Statement R2, published with the Regulation 19 evidence. Paragraph 6.4.7 records the Trust's representation and alternative strategy.

S9 HELAA 2025 Appendix K Radlett site proformas, published on the current supporting-studies page. Main Kemprow CFS-2025-133 (HEL379), pages 63 to 66; land off Watford Road CFS-2025-175, pages 67 to 70; Oakridge Avenue CFS-2025-194, pages 71 to 74; Starveacres HEL-0231-22, pages 75 to 80; western HEL-1021-22, pages 87 to 92; Hill Farm HEL-1052-22, pages 117 to 122.. Proforma yields are not confirmed Reg19 sub-parcel capacities. These historic site yields do not apportion the current 1,573-home allocation.

S10 AECOM Hertsmere Settlement Hierarchy Review, May 2026. Executive summary services and connectivity scores; section 4.2 and Table 4-4, printed pages 23 to 24 (PDF pages 28 to 29). https://www.hertsmere.gov.uk/asset-library/hertsmere-settlement-hierarchy-review-final-report1.pdf

S11 Environment Agency Colne abstraction licensing strategy, updated 12 February 2026. Sections 3.3, 3.6, 4.2 and 5.1. https://www.gov.uk/government/publications/colne-catchment-abstraction-licensing-strategy/colne-abstraction-licensing-strategy

S12 Hertsmere Draft Regulation 18 Consultation Document April 2026, paragraph 12.1.10, Table 12.1 and HRA SA3/HRA SA4/HRA SA6 site entries. https://www.hertsmere.gov.uk/asset-library/reg-18-final-document-27.04.2026.pdf

N1 August 2026 NPPF Annex A, particularly paragraphs 1, 2 and 8. https://www.gov.uk/guidance/national-planning-policy-framework-annex-a-implementation

N2 Matthew Pennycook letter of 15 July 2026 on pragmatic and proportionate examination of deliverability and viability; Planning Inspectorate explanation published 21 July 2026. https://www.gov.uk/government/publications/local-plan-examinations-letter-to-the-interim-chief-executive-of-the-planning-inspectorate-july-2026 and https://www.gov.uk/government/news/ministerial-letter-on-local-plan-examinations-welcomed

N3 Environmental Assessment of Plans and Programmes Regulations 2004, SI 2004/1633, regulations 9 and 12 and Schedule 2; Planning Inspectorate Model representation guidance for local plans being examined in the legacy system, updated 1 June 2026, particularly sections 3 to 5. https://www.legislation.gov.uk/uksi/2004/1633/contents and https://www.gov.uk/government/publications/model-representation-form-for-local-plans/model-representation-letter-for-local-plans.

N4 Hertsmere Regulation 19 Print Survey Form, ten pages; supporting-studies page; and the Council's New Local Plan publication webpage. The latter states that Full Council will consider an update and responses before submission. https://www.hertsmere.gov.uk/asset-library/regulation-19-print-survey-form.pdf and https://www.hertsmere.gov.uk/newlocalplan

N5 Department for Education, Opening new schools September 2026, school size at PDF page 41 (printed page 41) and travel considerations at page 39. https://assets.publishing.service.gov.uk/media/6a05a5dada82768016cb3f5a/Opening_new_schools_guidance_2026.pdf

N6 St Albans City and District Council Local Plan 2026, adopted 9 September 2026, Part B, allocation B8 Harper Lane north of Radlett, PDF page 28: indicative 274 homes; key development requirements 1 to 4 cover walking and cycling connections into Radlett, bus-stop access, and B556/A5183 junction capacity and constraints. https://www.stalbans.gov.uk/sites/default/files/attachments/Planning%20Policy/ADO/Local%20Plan%20Part%20B%20%28Adopted%29.pdf

N7 HSE, Dust suppression on dusty roads, identifying water sprayers and wheel washers; Environment Agency, Treating and using water containing suspended solids at construction sites RPS 235. https://www.hse.gov.uk/copd/dustsuppresion.htm and https://www.gov.uk/government/publications/treating-and-using-water-that-contains-concrete-and-silt-at-construction-sites-rps-235

L1 Letchmore Heath Village Trust Local Plan Regulation 18 Consultation Submission, corrected version supplied by the Trust. Alternative map and strategy at printed pages 3 to 5, with detailed transport, infrastructure and environmental concerns.

L2 Sanderson Associates, Transport Technical Note for Aldenham Parish Council, 402338-001-02, final issue 29 May 2026. Survey, modelling, committed development and indicative allocation trip generation, including appendices.

L3 Sanderson Associates, Accessibility by Sustainable Travel Modes for Aldenham Parish Council, final issue 29 May 2026. Supplied filename 402338-002-03-1.pdf; printed report reference 402338-001-03. Site-specific walking, cycling and public transport assessment.

L4 Aldenham Parish Council response to Hertsmere Draft Local Plan Regulation 18 Consultation Document, 29 May 2026

L5 Radlett Society and Green Belt Association comments on Hertsmere Draft Plan, 22 May 2026,

L6 Photograph of agricultural land classification map supplied to the Trust through the farmer. Original report, date, exact coverage and hectares are unverified. Supporting context only.

L8 Trust local observations of the Battlers Green Drive parade, supplied in this review; Battlers Green Farm's published shops and services directory, checked 1 November 2026. https://battlersgreenfarm.co.uk/shops-and-services/ and https://battlersgreenfarm.co.uk/tenant-list/. The limited parade and the separate shopping village are different destinations.

L9 Application 25/1781/FUL: original Hertsmere Climate Change response, portal document 1987165, page 4 water calculation; follow-up Climate Change and Sustainability comments dated 28 May 2026, document 2055599, pages 1 to 2. Read with the 5 November 2026 Planning Committee public reports pack.

L10 Home Farm 26/1236/OUTEI, EFM Education Provision report, Jan Kinsman, August 2026, portal document 2091697, prepared for the applicant. Paragraphs 5.18 and 5.22 to 5.33, and 8.1 to 8.2; printed pages 13 to 16, PDF pages 14 to 17. Confirms applicant's proposed one-form-entry school and reservation for two forms; does not establish agreement with HCC or a 350–400-occupation opening trigger.

L11 Home Farm 26/1236/OUTEI, Energy and Sustainability Statement, portal document 2091615, Water Requirement, printed page 16, PDF page 17. The proposed fittings are calculated to equate to 104.2 litres per person per day; reserved-matters consideration of rainwater recycling is also mentioned.

L12 Affinity Water Regulatory Annual Performance Report for year ended 31 March 2025, PDF page 39 (spread of printed pages 74 to 75) and PDF page 41 (printed pages 78 to 79). Records 12-month spot household PCC 153.9 litres per person per day and three-year average 154.9. Source: https://www.affinitywater.co.uk/docs/Investor_Library/2025/annual-performance-report.pdf. This is the full performance report, rather than the shorter annual-report summary.

L13 ONS Census 2021 TS045, Nomis dataset NM_2063_1, household car or van availability, extracted 1 November 2026 for Hertsmere 005 MSOA E02004900 and England and Wales K04000001. Radlett-area counts: total 3,188; none 270; one 1,168; two 1,184; three or more 566. England and Wales: total 24,783,199; none 5,777,957; two 6,485,738; three or more 2,282,606. Census disclosure-control adjustments can cause small differences between tables. https://www.nomisweb.co.uk/datasets/c2021ts045

L14 Trust's cumulative-project references supplied 1 November 2026: 25/1463/FUL, 25/0153/FUL, 25/1842/FUL, 24/1283/OUTEI, 23/1731/FUL and 25/1108/OUT, alongside the substation permitted-development works.

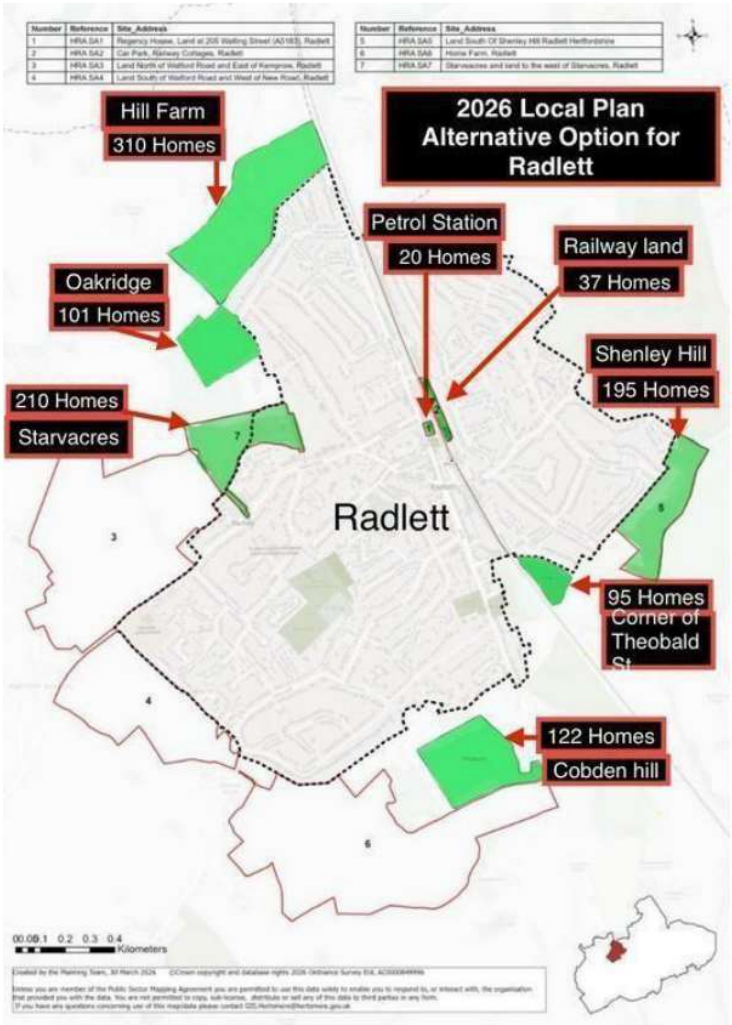
L15 Cowley-on-the-Hill: developer's proposals 26/1501/OUTEI for 994 homes

L16 Council resolution, including paragraph 1.4 concerning Regulation 9(1). The exact adopted minute has not been independently verified in this audit. The Council's current publication webpage, N4, independently confirms a return to Full Council before submission.

L17 SEGRO Logistics Park Radlett, community Q&A, Transport and Highways questions 5, 6 and 8: cumulative traffic, construction access and operational HGV routing. Accessed 7 November 2026. https://www.segro.com/countries-repository/united-kingdom/segro-logistics-park-radlett-community/qa

Appendix Historic Trust alternative submitted at Regulation 18

This map records the alternative formally submitted at Regulation 18. It is included to make that earlier proposal available with this representation; it is not the current preferred boundary or a current capacity schedule. Hill Farm is not counted in the present alternative; current town-centre supply is 47 rather than the historic 57; Home Farm and the retained HRA6 parcels are addressed in section 9.



That assessment indicates that the alternative approach may align more closely with many of the objectives, principles and policy directions set out within the draft Local Plan itself, the Radlett Key Themes and Priorities document, the emerging Spatial Strategy and associated supporting evidence.

4

LETCHMORE HEATH VILLAGE TRUST 10 November 2026