

24/01424/MOA

Land At Shaffold Knoll Farm Lower Road Nash Mills Hemel Hempstead HP3 8RT  
NASH MILLS PARISH COUNCIL - OBJECTION



Proposal: Outline Planning Application for construction of 33 dwellings (Use Class C3) and (up to) a 70 bed care home (Use Class C2), with new access to Lower Road and pedestrian links to canal tow-path (landscaping reserved).

**Nash Mills Parish Council (NMPC) objects to this application.**

The proposal is **contrary to the fundamental aim of Green Belt policy** to prevent urban sprawl by keeping land permanently open. It would **physically merge two settlements** and encourage similar Green Belt development proposals in the immediate area. The site forms part of a **pleasant open rural setting**; the value of that setting exceeds the physical size of the site.

There would be **significant harm to the spatial dimension of openness** that comes with the construction of a large residential development of this type. **The loss of spatial openness would be substantial.**

The proposed development, by reason of its siting, height, scale and appearance of the care home would be an incongruous addition to the streetscape, which together with the houses and apartments would be detrimental to the character and appearance of the rural nature of the site and its surroundings.

24/01424/MOA

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## **GREEN BELT**

The site is classified as Green Belt. The development of this site would not deliver very special circumstances to justify overriding the Policy CS5 of the Dacorum Borough Core Strategy (2013) and Section 13 of the National Planning Policy Framework (NPPF).

The NPPF states that :

“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”.

“Green Belt serves 5 purposes:

- (a) to check the unrestricted sprawl of large built-up areas;
- (b) to prevent neighbouring towns merging into one another;
- (c) to assist in safeguarding the countryside from encroachment;
- (d) to preserve the setting and special character of historic towns; and
- (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

Developing the land at Shaffold Knoll Farm would fail these purposes.

### **(a) to check the unrestricted sprawl of large built-up areas;**

Nash Mills has seen significant development within the last 15 years. More than 450 dwellings were added on its perimeter at Nash Mills Wharf. The Nash Mills Wharf site borders the green belt and development was not permitted beyond Red Lion Lane to prevent sprawl into an area of countryside.



*Figure 1 – View beyond Red Lion Lane, proposed development site in the distance.*

24/01424/MOA

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NASH MILLS PARISH COUNCIL - OBJECTION

**(b) to prevent neighbouring towns merging into one another;**

The site marks the border of Nash Mills and Hemel Hempstead on one side with Abbots Langley, and over the canal with Kings Langley. Its development would mark a decision to permanently merge the Dacorum Borough and Three Rivers District.

A development of this nature would irreversibly affect the community of Nash Mills with its “village” community feel. Nash Mills is unique as a Parish in Hemel Hempstead.

**(c) to assist in safeguarding the countryside from encroachment:**

The site forms part of the countryside that stretches from the valley in which it sits up through Abbots Hill to Hyde Farm, Pimlico and beyond to St Albans.

The site is adjacent to the towpath of the Grand Union Canal which is used extensively for leisure walking, giving quick and easy access to the countryside for residents of the surrounding urban areas. It is an invaluable environment to escape, boosting health and wellbeing. The footpath is used extensively, and the experience would be significantly harmed by urbanising it through the proximity of a housing development, particularly as it is proposed to change the tow path interface to the site.



*Figure 2 - Canal towpath adjacent to the site – view south*



*Figure 3 - Canal towpath adjacent to the site - view north*

24/01424/MOA

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**(d) to preserve the setting and special character of historic towns; and**

Whilst not officially classified as a “historic” town, the community of Nash Mills is perceived as a village type community and is recognised to have several sites of significant historical interest. The locality played a significant role in the development of the paper industry from c. 1768 and from 1811 through John Dickinson’s companies; it contains his former Nash House (c. 1790) and Abbots Hill House (c.1837). Belswains Lane has some cottages, the core of which date back to the 16<sup>th</sup> century. The proposed development site plays an important role in maintaining the character of the area which would be irreversibly harmed by such development.

**(e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.**

The emerging local plan identifies a significant development potential at the Apsley Mills retail park. There is also a recently approved planning application to develop the Network House site in Apsley / Kings Langley – this including 65 retirement living units and 69 apartments. These are demonstrations of the potential to recycle urban land without the need to sacrifice Green Belt.

## **DETAILED OBSERVATIONS**

Nash Mills Parish Council has several observations on points of detail which represent their concerns about the proposed development.

- Nash Mills Wharf
  - The proposal documents make several references to the “Water Mill House development”. In fact, Water Mill House is a small part of the Nash Mills Wharf development. There are well documented issues related to the planning process / development of that site which, should this new development proposal be approved, must be considered to avoid repeating past mistakes.
- Care Home
  - A 3-story block building would not create a satisfactory streetscape. The other side of the road has tall trees, and the ground rises steeply. A tunnel perspective would be created. This is also like to amplify vehicle noise which is unlikely to be desirable for care home residents.
- Gateway to other development
  - The proposal documents themselves either allude to or state specifically that approval of the Shaffold Knoll Farm proposal would be likely to unlock further development proposals whereupon precedent would weigh heavily in their favour. The proposal to unlock this parcel of Green Belt must therefore take account of that potential. Other sites include:
    - The Crest Nicholson land parcel adjacent to Red Lion Lane
    - The commercial storage yard between the site and the Village Hall
    - The rest of Shaffold Knoll Farm (which we believe has the same owner as the proposed site).
- Emerging local plan
  - The proposed development should be assessed in the context of the DBC emerging local plan including the impact of sites already identified in the Apsley corridor, together with c 10,000 homes in Hemel Garden Communities. Major developments need to be part of an overall plan and not achieved through opportunistic proposals which would be a detriment to the local communities.
- Planning Design and Access Statement
  - Page 2 states: *“and a large parcel of vacant land to the western end which in turn extends northwards towards Red Lion Lane to the north. The latter parcel has been promoted by Crest Nicholson Operations Limited through the call for sites process associated with Dacorum’s emerging Local Plan, as a site for allocation for (primarily) residential development and, by implication, for removal from the Green Belt”*. For the record, whilst the site may have been promoted, it is not included in the emerging Local Plan and this statement is therefore irrelevant. DBC recognised the value of the land’s status as Green Belt.

- Pages 8 to 10 go on to make statements which exaggerate the reality of the current situation and suggest justifying the current proposal by implying approval for even more development! NMPC fundamentally objects to the principal of these assumptions. The value of the Green Belt space to the western side of Lower Road is amplified by its linking to the open space on the eastern side. Most of the open land referred to is in Nash Mills with the built form in Abbots Langley. This emphasises the need to **prevent?lower Road neighbouring towns merging into one another** as per the NPPF.
  - *“The site sits within a continuous run of built / developed form fronting Lower Road running from 10 Shafford Cottages to the south, to the junction/roundabout where Lower Road meets Red Lion Lane to the north. Indeed, if the landscaped areas to the front of the MotoTom commercial premises to the south (where Shafford Knoll Farm is located) were used / developed in the same manner as the land to the rear of that site, then the Lower Road frontage would be continuously developed from Red Lion Lane all the way through to the railway archway over Lower Road to the south - a distance of c0.6km’*
  - *The (partial) infilling of the site frontage to Lower Road would reflect the reality that the western side of Lower Road is fundamentally filled with development, and that the proposal would simply assimilate with the prevailing usage of land fronting Lower Road.*
  - *“That the site is tightly defined by development to the south, the canal to the west, Lower Road to the east and - currently partially – development lining Lower Road which runs up to and abuts the Apsley settlement boundary to the north, the site is effectively ‘book-ended’ between established physical features and built form. Indeed, the presence of backland development to the south and the envisaged allocated of backland to the north of the site should the Crest Nicholson site be allocated, encourages further support for the sites credentials as a site for infill development. This situation lends itself favourably to being infilled.”*

## **INFRASTRUCTURE**

There are several serious infrastructure issues in the local area which would be exacerbated by the proposed development:

- **Thames Water capacity**
  - The area has notable sewage and wastewater stress. There has been repeated wastewater flooding in the NMPC play park at the junction of Bunkers Lane and Belswains Lane/Lower Road. The infrastructure was not upgraded for the addition of Nash Mills Wharf.
  - Further along Lower Road into Railway Terrace suffers frequent and significant storm water flooding. Thames Water need to carry out a detailed capacity study, rather than a desktop cursory review.
  - The website <https://check-long-term-flood-risk.service.gov.uk/risk#> identifies that the surrounding area has a high chance of yearly surface water flooding. “Surface water flooding is sometimes known as flash flooding. It happens when rainwater cannot drain away through normal drainage systems”. The proposed development site in its current state would be likely absorb any flash flooding; but how would the area cope if developed with properties?
- **Affinity Water capacity**
  - There are frequent bursts to the water supply network in Belswains Lane. Affinity Water need to carry out a detailed capacity study, rather than a desktop cursory review.
- **Canals & River Trust**
  - The SUDS STRATEGY within the proposal details an intent to discharge into the River Gade / Grand Union Canal. Paragraph 5.8 states: “Surface water from the east catchment will be drained via infiltration. Due to high groundwater levels observed along the west boundary, the west catchment will be drained by conveying flows to the River Gade. At the time of writing, consultation with the Canal and River Trust is ongoing.”  
The proposed development can surely not be considered further unless / until the Canals & River Trust has approved this strategy. Nash Mills Parish Council has concerns about the potential for pollution of this important water course and the impact on the ecology and wildlife that depend upon it.
- **Dacorum Borough Council (DBC)**
  - SANG provision. The developer proposes to make a financial contribution rather than to provide SANG directly. Does DBC have capacity in existing designated SANG to facilitate this?
  - PARKING. It is well documented that Nash Mills suffers from significant parking stress. The lack of capacity with Nash Mills Wharf has forced parking overflow into surrounding streets –to the detriment of the



residents of those streets. No further development should be permitted which would add to this stress.

- The 3-bed properties proposed have 2 spaces allocated, NMPC believes that the standard requires 2.25.
- NMPC asks the planning officer to fully analyse the compliance of proposed tandem parking and garages versus standard spaces.
- The plans appear not to provide sufficient parking for visitors to the proposed development. Would on street parking be a) permitted and b) affect the amenity of the residents?
- It should be noted that Water Mill House does not have sufficient parking, and they have resorted to renting additional spaces at Nash Mills Village Hall.
- Since double yellow line restrictions were introduced in Red Lion Lane, on street parking has moved to Lower Road adjacent to the proposed development site. The current site entrance and adjacent commercial storage site are already “protected” by cones to preserve their access. Under provision within the development would only exacerbate this problem. HCC, in their comments, have requested additional lines from the site to the roundabout, impacting further on parking stress further along Lower Road which is already experiencing difficulties from the railway bridge onwards and currently under investigation by HCC.



*Figure 4 – Traffic cones outside the site entrance to prevent parking*

- The Hertfordshire and Middlesex Wildlife Trust
  - HMWT manages Long Deans in Nash Mills, a picturesque valley of pasture and old parkland with magnificent oak, beech, ash and wild cherry trees. The trust has previously expressed concern at the volume of walkers in the park having a negative impact on the important habitats. Adding a development sized as the proposal risks to increase the volume of visitors / impact.
- Hertfordshire County Council.
  - HIGHWAYS
    - There is frequent gridlock around Nash Mills, especially in Belswains Lane and Red Lion Lane at peak times. A development



of this scale would only add to the problem, especially with the cumulative effect of potential larger developments in the Apsley corridor (Network House / Apsley Mills).

- As documented under DBC above, Nash Mills has severe parking stress. This continues along Lower Road up to the railway bridge with on pavement parking affecting sight lines as reported by local residents.
  - There has been some mention of additional double yellow lines on Lower Road, but this would only once again displace the parking (as demonstrated by Red Lion Lane) thus increasing the harm to residents and users of other streets in Nash Mills. (see point above)
  - Lower Road also has issues of speeding as cars accelerate through the railway bridge at one end and away from the roundabout at the other. This would provide an additional risk for vehicles entering / existing the proposed development site.
  - Kings Langley's local plan implies the introduction of traffic calming measures in the Kings Langley High Street. This would be likely to introduce the traffic flow along Primrose Hill, Railway Terrace and on into Lower Road adjacent to the proposed development.
- SCHOOLS
    - Abbot's Hill School is listed in the Travel Plan, but it should be noted that this is a private school.
    - Nash Mills C of E primary school is only 660m away, but this is already over-subscribed and has specific eligibility criteria.
    - The next closest primary schools would, in practical terms, all require parents to use cars to deliver / collect their children.
  - Health Authorities
    - GP and dentist provision in the area is already oversubscribed. A care home would certainly add to their workload. What provisions would be secured so that the development would not have a detrimental impact on the local community?
  - Aviation Fuel pipeline
    - There has been some speculation about the routing of the aviation fuel pipeline between Buncefield and Heathrow Airport. NMPC requests that the planning officer confirms that it is not in close proximity to the proposed development.

24/01424/MOA

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## **CONDITIONS**

Whilst NMPC strongly objects to the development proposal, it asks that the following approval conditions be considered should its objection be overruled.

- Community engagement is needed before finalising the detail of the plans.
- Permission Conditions to ensure that the garages cannot be converted to living accommodation without planning approval.
- A financial contribution should be made to the Canal & River Trust to help them maintain the local canal infrastructure. The development proposal makes much of the value of this local amenity, but C&RT needs funds to maintain it effectively.
- A financial contribution to the Village Hall so that it can continue to provide enhanced facilities for residents of the new development and the wider community.
- A child's play park should be provided within the development.
- Funding for NMPC to update the play equipment in its Bunkers Play Park at the junction of Bunkers Lane and Belswains Lane. This would benefit both the residents of the new development and the wider community.
- A Parish Council noticeboard should be funded within the development to facilitate information for the residents about the local community of which they would be part.
- Ensure compliance with the Council's sustainability objectives
  - Low carbon
  - EV provision (standard 50% active / 50% passive)
  - No gas supply provision
  - Eco builds including minimising water consumption.
  - Living roofs
  - Wildlife corridors
  - Include a community orchard / small allotments

The proposed housing / apartment designs should be substantially maintained and not downgraded to lower quality appearance within the planning approval process.

24/01424/MOA

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## **CONCLUSION**

NMPC contends that that the development would be inappropriate development in the Green Belt and **contrary to the fundamental aim of Green Belt policy**.

The identified harms must be afforded substantial weight, and very special circumstances have not been successfully demonstrated to outweigh the harms identified.

**The loss of spatial openness would be substantial.** It would **physically merge two settlements**. The site forms part of a **pleasant open rural setting**. The care home would be a would be an **incongruous addition to the streetscape**.

The DBC emerging Local Plan does demonstrate sufficient forward supply of housing and appropriately considers where that housing should be provided within the Borough, together with the necessary infrastructure.

The development does not provide new public open space, just an access route through to the canal. No public facilities are proposed. The changes to the site's border and interface with the canal would bring substantial harm through the loss of rural perspective on the tow path.

The site's location close to the M25 and the railway network would be more likely to attract the migration of new residents from more expensive areas in Greater London, rather than truly benefitting existing local residents. In fact, the development would bring additional infrastructure strain bringing harm to existing local residents (ecology, health services, parking, roads, schools, water supply / evacuation etc).