

Carpenders Park Residents Association

105 Carpenders Avenue

Carpenders Park

Watford

WD19 5BN

28 July 2021

Dear Sir/Madam

I write on behalf of the Carpenders Park Residents Association in response to the Preferred Policy Options Consultation documents. Please note that when figures are quoted in this letter the figures are from information on Three Rivers District Council website, all comments in quotation marks are from Three Rivers District Council website unless otherwise stated.

General Comments

It is noted that page one of Part 1 of the consultation document has a plan of Three Rivers District, if all the proposals made in respect of land in Carpenders Park Ward were to be adopted all the land south of the B4562 (Little Oxhey Lane) and most of the land on the east side of Oxhey Lane i.e. the majority of the land shown on the plan to the document as not built on, would have either housing or a secondary school. There would no longer be any green belt land in Carpenders Park as in there would be nothing between Carpenders Park and the London Borough of Harrow, Watford Borough Council and Bushey (Hertsmere).

I am sure Three Rivers District Council does not need to be reminded of the main purpose of the greenbelt “to safeguard the countryside from encroachment and to prevent neighbouring towns merging into one another”, sites CSF13, CSF14, CSF69a and PCS47 form a gap “between the settlements of Carpenders Park, Hatch End and Busheydevelopment of the site and reduction to the gap would materially conflict with the purpose of Green Belt in preventing neighbouring towns merging into one another”. This is a comment from a Three Rivers District Council officers report on a proposal for development close to the proposed development sites.

A view of any map will prove this point. The gap between Carpenders Park and the London Borough of Harrow is very narrow as is the gap between Carpenders Park and Watford (not just the Watford Borough Council area but land which most people would consider to be Watford).

It is unclear from the proposed plan how Three Rivers District Council could reconcile the statement in their proposal document: “a pressing need for more homes, especially more affordable homes, so young people are not forced to move away from the area, but that **this cannot be addressed at the cost of harming existing communities and reducing the quality of life and wellbeing of our residents.**” with the clear and total loss of land which is vital to the life and wellbeing of the current residents of Carpenders Park and the great harm which would be inflicted on this small community of 5212 adults by imposing a 66% increase in population with no indication of the improvements to infrastructure that would be needed to cope with this increase in population. The loss of our “green environment” would be felt by all residents.

The 66% increase in the population of Carpenders Park envisaged by the proposals will make Affinity Water's plea to residents in June to reduce their water usage and the launch of the campaign "SOS Save our Streams" doomed.

Transport

Can the current transport facilities cope? No evidence is given as to whether Three Rivers District Council has considered the implications for the travel options of possible future residents of the proposed developments. This is commented on by Hertfordshire Highways on a number of the sites proposed and will be commented on for each of the relevant sites.

Residents of Carpenders Park have expressed doubt as to whether the two roads mainly affected by the proposals, Oxhey Lane and Little Oxhey Lane, have the capacity to cope with the additional traffic that would be generated by the proposed new dwellings. Both roads are currently very busy, Little Oxhey Lane has a narrow bridge where it crosses the main Euston railway line, whilst Oxhey Lane described as a "main transport route" leads to the traffic nightmare that is Bushey Arches. Hertfordshire Highways has commented about the need to assess whether these roads have the capacity to cope with the traffic from the proposed developments.

It is also noted that both Oxhey Lane and Little Oxhey Lane flood, again mentioned in the detailed assessments of various sites.

All the sites proposed for development in the consultation, bar one, are a distance from Carpenders Park Railway Station. There is currently an inadequate bus service of one bus an hour into Watford and no buses from the estate into Harrow, prior to the pandemic it was an inadequate expensive two buses an hour, new residents are therefore not expected to be reliant on public transport. Due to their distance from the main centre of Carpenders Park and anywhere else the occupants of the proposed new dwellings will not be walking but driving.

There is no car park at Carpenders Park Railway Station unless you are willing to drive over the bridge in Little Oxhey Lane, so commuters find parking where they can often outside residents homes and along Delta Gain.

Three Rivers District Council recent consultation, re cycling in the district and in particular in Carpenders Park, did not state how cyclists were to be protected when using the proposed cycling routes.

Major infrastructure improvements to the narrow bridge in Little Oxhey Lane and the congestion hotspot of Bushey Arches would need to be made by Hertfordshire County Council prior to any of the development. Affinity Water/Thames Water will have to make major improvements to the water supply, surface water drainage and sewer drainage before any new dwelling envisaged by the consultation could be occupied.

Infrastructure

We are told there might be 2 new primary schools depending on which sites are developed but no indication is given as to whether the local doctors surgery can support the increased population, detailed information is not given in the evidence although it is clear elsewhere on the website that Three Rivers District Council has the evidence. For current residents with no access to private vehicles the surgery in Attenborough Close is the only surgery they can attend, there is no direct bus route to the Bushey Medical Centre, how are new residents meant to access doctors surgeries as the new developments are so far away from the few facilities that currently exist in Carpenders Park?

There is no indication in the proposals as to whether some land may be used for new shops to serve the large number of proposed new dwellings. Presumably this is going to be dealt with in later consultations?

Climate Change and Flooding

Para 7.21 of the proposal states that climate change will result: “in drier summers and warmer, wetter winters” a quick look at the BBC website [What will climate change look like in your area? - BBC News](#) reveals that in the summer there may be fewer days of rainfall but that rainfall will be more intense, potentially 28% more, in winter 40% more. The recent floods in North London, close to Carpenders Park inform us of the possible nature of these floods. After one summer storm several years ago Carpenders Avenue turned into a river with the crown of the road hidden by the flowing water and people in even numbered properties (the downhill side) looking worried at the height of the water and hoping that it wasn't going to rise beyond the edge of the pavement, the government's website [Your long term flood risk assessment - GOV.UK \(flood-warning-information.service.gov.uk\)](#) shows the writers property in Carpenders Avenue at high risk of surface flooding.

The evidence submitted in the proposals is in respect of new homes not the impact those new homes being placed on previous green field sites could have on the existing settlement of Carpenders Park. No mitigation on these new sites should result in any increase in the flow of water from these sites as this will directly impact on current residents of Carpenders Park and Hatch End.

The Mead in Carpenders Park has in June 2021 seen the road crack and the road surface rise to above kerb height after heavy rainfall, only experts know whether the problems with the road surface are due to running water/problems with the existing drainage system or other more long term problems due to heavy rainfall. In recent years as stated earlier in this letter the crown of Carpenders Avenue was obliterated by the river that came down the road. At least two properties in The Mead have been affected by more than one flooding issue. It is noted that an assessment of site CP1a 9 (not put forward but very close to The Mead) states the groundwater level is only 0.025m below the surface which explains why properties in The Mead have flooded.

The writer has a spring coming out of the garden wall behind her garage in Carpenders Avenue, the garage is built into the hill, her patio also built into the hill frequently has damp/wet on the paving slabs with no recent rainfall. Ground water levels are very high in Carpenders Park, there are anecdotal accounts of residents in By The Wood having sudden ponds in their back gardens after rainfall, this accords with: “Surface water ponding occurs where the topography flattens on the floodplain of the River Colne, at ... Carpenders Park”.. There is regular flooding in some properties. A planning application in land off of Oxhey Lane in 2014 revealed that the land was sitting on 56 metres of London clay and attempts at testing whether water could be drained via soakaways was abandoned as the water did not drain and the test holes had to be pumped out.

The current Carpenders Park settlement lies in a valley which slopes down to the railway line. All the current settlement at Carpenders Park is affected by water which comes down the hill from the fields which are identified to be built on. Flooding occurs on the estate as can be observed by any consultation of the Watford Observer records and the governments website [Check the long term flood risk for an area in England - GOV.UK \(information.service.gov.uk\)](#) The view of current flood risk in Carpenders Park and on the proposed sites is alarming.

Two “main rivers” flow through Carpenders Park, Oxhey Brook and the Hartsbourne Stream, both have caused flooding to properties in Carpenders Park and both are culverted for long lengths with the resultant risk of blockages causing flooding.

Nearly all the identified sites in Carpenders Park state that mitigating measures will be needed to deal with surface water problems. The residents of Carpenders Park do not wish their risk of flooding to be increased because of a development approved by Three Rivers District Council.

No indication is given as to whether the existing foul water drainage system has the capacity to cope with the influx from the proposed new dwellings.

General

It is noted that only sites CFS12 and CFS13 appear in Appendix 9 – List of deliverable/developable sites. How do sites CFS14, CFS69a and PCS47 therefore appear in Three Rivers District Council’s list of preferred proposed sites when Appendix 8 of Three Rivers District Council evidence states that they are UNSUITABLE and NOT DEVELOPABLE/DELIVERABLE? No reason is given in Appendix 2 as to why some sites which are suitable and tick all the other boxes in Appendix 8 are not being taken forward.

Comments on each site, there will some repetition as similar concerns arise in connection with many of the sites.

Site CFS12

This site comprises some land to which planning permission was granted in 2010 and part of the site is employment land. In para 5.8 of your consultation document we are told: “The South West Herts Economic Study (2019) has been used to inform the detailed requirements for land or floorspace for economic development over the plan period. The Study indicates that on the basis of projected growth within the area, Three Rivers cannot afford to lose any more employment floorspace. “.

How can Three Rivers District Council reconcile the statement in the consultation document that it will safeguard allocated employment sites “for business, industrial and storage or distribution uses” when the proposals as presented would result in the loss of an employment area in Carpenders Park? The Issues & Options consultation in 2017, stated) it was important to continue to safeguard the existing allocated employment sites, the Council would appear to be going against its own policy as set out in para 5.2 of Part 1 of the preferred Policy document.

Planning permission granted in 2010 has never been implemented and has now lapsed. If used wholly as residential development Three Rivers District Council’s own report in Appendix 7A states: “The site is adjacent to Carpenders Park rail station. Noise and vibrations caused by the use of Carpenders Park train station may have an impact on the site and its future occupiers.” “Proposals would need to provide suitable mitigation to address groundwater flood risk, surface water flood risk and fluvial flood risk on areas of the site.”

Previous planning applications for the whole site suggested the use of an underground car park to resolve parking issues, the surrounding land floods, and this idea did not appear sensible to residents, the planning application was refused due to the loss of employment land. No planning should be granted unless the vehicles to be used by future residents is taken into consideration. It is not acceptable to state that the land is next to a transport hub and therefore

private transport is not needed and therefore no provision is needed to cope with private vehicles, Watford Borough Council have tried this at Bushey Arches and the resultant travel chaos is apparent to everyone. There are many vehicles parked on Delta Gain from commuters already we do not need additional vehicles from the proposed new development at site CSF12.

CFS13

The detailed assessment of this site as given in Appendix 8 of Three Rivers District Council assessment states : "The Stage 2 Green Belt Review assessed harm to the Green Belt of releasing the wider parcel (in which the site is located) as **moderate-high**". This land is stated to be **not suitable and not deliverable/developable**.

The assessment of the site states "consideration has to be given to the gas pipeline and the surface water risk on the southern boundary **in particular as this is where the site meets Oxhey Lane, this main transport route should not be compromised by additional flooding risks.** "

The association would be sad to lose this area of open grazing land but it is at the extreme edge of Carpenders Park.

The site is on a bus route.

CFS14

The detailed assessment of this site as given in Appendix 8 of Three Rivers District Council own assessment states this land is **not suitable and not deliverable/developable**. Part of the site is an historic landfill and land is adjacent to a current "unlicensed" landfill site which may have an impact on future occupiers of site CFS14.

HCC highways have expressed concern over the distance from the main built up areas of Watford Heath and Carpenders Park that "there is limited opportunity to enhance provision of walking/cycling due to location and distances from local services". New residents will rely on cars which makes the site unsustainable an additional 175 vehicles twice a day on Oxhey Lane is not a sustainable development. There is a bus route of one bus an hour on Oxhey Lane.

CFS69a

The detailed assessment given in Appendix 8 states this site is **unsuitable, undeliverable/undevelopable**. The Stage 2 Green Belt Review assessed harm to the Green Belt of releasing the wider parcel (in which the site is located) as **very high**. "A large area within the centre of the site at a high risk of surface water flooding" (appendix 7a page 208). "The need for housing does not outweigh 'very high' harm to the Green Belt through the release of land and allocating the site would not outweigh harm to the Green Belt, if released. A proportion of the site is also unsuitable for residential development due to the location of the Hartsbourne Flood Storage Area and the need for a 10m buffer distance from this flood risk asset to any development. Part of the site is also a Local Wildlife Site which is considered to be unsuitable for development. The site is **deemed unsuitable, unavailable and therefore undevelopable.**" (appendix 7a page 209)

"HCC Highways state that "the site is approximately 1 mile from central South Oxhey, although the A4008 may discourage walking and cycling. A significant concern is raised by HCC Highways in the location of the nearest bus stops being over 400m away (in Harrow

Way); significant contributions would be necessary to enable adequate bus service improvements.” Residents believe these bus improvements will not occur and if they did would be of short duration, the current bus is an hourly service and the service to Harrow was cut many years ago.

PC47

The detailed assessment given in Appendix 8 states this site is **unsuitable, undeliverable/undevelopable.**

The detailed assessment of this site as given in Appendix 7d of Three Rivers District Council’s own assessment of the site states: ”The site is located in the Green Belt. Harm to the Green Belt of releasing the wider parcel (in which the site is located) is assessed as **very high**. The need for housing **does not outweigh** ‘very high’ harm to the Green Belt through the release of land. Whilst the site would contribute to meeting housing needs, its development would not deliver any strategic infrastructure. It is considered that allocating the site would not outweigh the very high harm to the Green Belt, if released. **The site is therefore deemed unsuitable for residential allocation.**“

This assessment mentions the possible congestion at the narrow bridge in Little Oxhey Lane and the difficulties of the site being sustainable.

Residents of Carpenders Park see surface water on the site, the detailed assessment states that two tributaries of the River Pinn arise on this land which also comprises their flood plain. Little Oxhey Lane floods when the ditch next to the highway is not cleared regularly. This site is at a lower level than the main Carpenders Park settlement and no change to land levels could occur without a major risk of flooding to existing properties.

The high voltage electric cable which runs across the site, plus the main line railway line running along the western boundary of the site plus the watercourses makes this site difficult to achieve without causing harm to existing residents of Carpenders Park and new residents of the site. There is also the potential for harm to residents of the London Borough of Harrow which adjoins the southern boundary of the site.

CFS11

The assessment of this site given in Appendix 7 is It is considered that the exceptional need for a secondary school in this location outweighs the ‘**very high**’ level of harm in releasing this land from the Green Belt. that it is only possible because of the need for a secondary school in this part of south west Herts,” **it is not suitable for housing because of the great harm to the green belt.**”

The assessment of this site states it is only suitable because of the need for a secondary school and the very high harm to the green belt would not be acceptable for residential use. It is therefore difficult for residents of Carpenders Park to understand why any development along Oxhey Lane is being considered due to the very high harm to the green belt.

The Residents Association believes the site is unsuitable for a secondary school due to the difficulty of students getting to the site unless they all live in Carpenders Park and are willing to walk. Other students will arrive by road, access can be either via the congestion hub of Bushey Arches or via the very narrow bridge on Little Oxhey Lane, the writer has discounted the double blind bend and narrow bridge at Watford Heath. School pupils who do not live in Carpenders Park will not be able to get to the proposed school.

Summary

The Carpenders Park Residents Association believes that Three Rivers District Council has not looked at all the evidence in Appendix 7 which proves that most of the identified sites are unsuitable for housing development and for a secondary school.

The greenbelt is very narrow between Carpenders Park and the London Borough of Harrow at Little Oxhey Lane, and the gap will no longer exist between Carpenders Park and Watford, the affected roads cannot cope with any increase in traffic as they are close to capacity as verified by Hertfordshire Highways.

Residents are rightly worried about increased flood risk if the hill above Carpenders Park is built on, children would miss their toboggan hill and dog walkers their area to walk, some residents walk to Bushey and will not do that if the area is built on. Do not destroy the green environment of Carpenders Park.

Miss G Ford

Secretary Carpenders Park Residents Association