



Campaign to Protect
Rural England

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Dean Goodman
Head of Planning & Building Control
St Albans City and District Council
St Peter's Street
St Albans
Herts. AL1 3JE

Your Ref:

Our Ref:

7 September 2006

Dear Mr Goodman,

Planning application 5/06/1680 for Helioslough Ltd
Proposed Rail Freight, etc Site, North Orbital Road, St Albans

I enclose a paper giving our comments on the use of the NATA appraisal process in the *Consideration of Alternative Sites* (Technical Report 6) carried out on behalf of the applicants.

We consider that the process has not been conducted appropriately or in accordance with the Department for Transport guidance for such projects, both in terms of the public consultation that has been carried out and the methodology used.

In view of the inadequacy of the pre-application public consultation in this respect, we ask that the Council should defer consideration of the application and refer it back to the applicants for this matter to be addressed in the appropriate way.

Yours sincerely,

KEVIN FITZGERALD
Hon. Director

Proposed Rail Freight Interchange, North Orbital Road, St Albans
The Use of NATA (New Approach to Transport Appraisal)

Comments by CPRE – The Hertfordshire Society

Helioslough state in Technical Report 6 *Consideration of Alternative Sites* that the New Approach to Transport Appraisal (NATA) appraisal process has been adopted in this case “*in order to provide a comprehensive and consistent method of appraisal for the identification of the optimum location*” (paragraph 4.2.1).

NATA is the Department of Transport guidance for such appraisals. It is broken down into Transport Analysis Guidance Units (TAGs).

Helioslough themselves acknowledge that “*the guidance ... should be seen as a requirement for all projects that require Government approval*” (Technical Report 6, para.4.2.2). However, there are concerns that Helioslough have not fully complied with the requirements of NATA in either carrying out the required level of public consultation or following the proscribed methodology.

1. Public Consultation:

TAG 2.5: The Appraisal Process states in paragraph 1.5.27 that “*public acceptability will be judged from the response to the public consultations in steps 4 and 11*”. Step 4 is the determining of the objectives of the proposal, and step 11 is the comparison of options.

It is our contention that public consultation did not take place at either stage. The necessary documentation to enable the public to engage with these topics was only made available in the public domain **after** Helioslough had decided on the Radlett option and had submitted their planning application.

TAG 2.11: Strategic Environmental Assessment requires detailed analysis of the key alternatives for any transport project to be carried out, ie an environmental assessment of each of the key alternative sites identified. It appears from the documentation put into the public domain by Helioslough that this has not been complied with. Moreover, the information from the environmental assessment of each potential site must be made available for public consultation. A written Environmental Report must be produced and made available to the public. The public must be given “*an early and effective opportunity within appropriate time frames to express their opinion on the draft plan and the accompanying Environmental Report before adoption of the plan*” (TAG 2.11, para 6.3.1).

It is clear that these assessments, if they were carried out, were not made available for public consultation. Again, the papers were only made available **after** Helioslough had decided on the Radlett option and had submitted the planning application.

It is not sufficient for Helioslough to say, in the Consultation Report included with the application, that “*prior to the main consultation event, Community Connect has been available to answer progress questions on the evolution of the Environmental Statement*”. Without the required Environmental Report being produced and available, it was impossible for the public to consider and query it.

Consequently, on key requirements of the NATA guidance, Helioslough have failed to carry out the necessary public consultation.

2. Methodology:

TAG 1.1: Introduction of Transport Analysis requires decision makers to ensure a balanced approach to economic, social and environmental issues arising from the proposals (paragraph 1.3.3) and to ensure that the process of identifying solutions should avoid leading to a particular outcome simply by virtue of the method or process adopted (para.1.4.3).

However, Helioslough appear to have pre-empted the outcome of the comparative analysis they carried out by designating Radlett as the base against which all of the other alternative sites were judged. “*Each specialist awarded a score to each site ranging from -5 (poor) to +5 (excellent) with the former Aerodrome site [i.e. Radlett] representing the neutral scenario (0).*” (Technical Report 6, paragraph 3.1.3).

In accordance with the NATA guidelines, the alternative sites were assessed against five main criteria: Environment, Safety, Economy, Accessibility and Integration, and allocated point scores. The scores were tabulated in an Appraisal Summary Table (AST) and simply aggregated. The resulting overall scores were then ranked, indicating Radlett as the optimum site.

Superficially, this appears to be objective, but under the Environment objective, no scores were awarded for the likely noise impact of the key alternative sites, because “*noise was not assessed due to prohibitive cost*” (Table 7, note 1) – this despite a clear request from the District Council for a full noise and vibration assessment in their letter dated 29 July 2004). Clearly noise is a factor which would vary from site to site depending on proximity to housing, projected traffic movements etc. and to give each site a zero score distorts the final outcome. Hypothetically, a positive score of (+1) for *noise* for any of the other sites when compared to Radlett as the “neutral scenario”, would have resulted in all of the other sites achieving a higher overall score on the AST.

Similarly the *landscape, townscape* and *biodiversity* scores make no allowance for the scope to provide compensating improvements or replacement habitats, and the *heritage* assessments are worst-case scenarios. All of this is subjective and unsatisfactory, and different results could be obtained by weighting each criterion differently.

Finally, NATA requires that a “*supporting analysis*” should be carried out covering, amongst other issues, the “*practicability and public acceptability*” of the proposal (TAG 1.1, paragraph 1.10.2). There is no evidence included with the application to demonstrate that this has been done.

Proposed Rail Freight Interchange, North Orbital Road, St Albans

The Environmental Statement

Comments by CPRE – The Hertfordshire Society

The documents comprising the Environmental Statement are somewhat complex and contain a great deal of technical information, which we have not fully appraised as yet. However, we wish to make some preliminary comments in respect of the preparation of the Environmental Statement and its contents.

Consultation prior to the Scoping Opinion

We note from paragraph 25 of “Environmental Impact Assessment: Guide to Procedures” (the Guide) published on the Department for Communities and Local Government website, that the Local Planning Authority “must consult certain bodies...before adopting a scoping opinion”. These bodies are statutory consultees as defined elsewhere within the Guide. Has this consultation taken place, and if so are the responses available for public inspection?

Contents of the Environmental Statement requested by the Scoping Opinion

The letter from Tom Rea, Senior Planning Officer, St Albans City and District Council to Richard Tilley of CgMs Consulting, dated 29th July 2004, represents the formal scoping opinion of the Local Planning Authority, in accordance with the Environmental Impact Assessment (EIA) Regulations 1999.

Environmental Assessment of Alternative Sites

Paragraph 28 of the Guide states that “Ideally, EIA should start at the stage of site selection” and paragraph 33 states that “developers are now required to include in the environmental statement an outline of the main alternative approaches...and the main reasons for their choice”. The scoping opinion, in confirming the main areas for inclusion in the Environmental Statement, states: “particular emphasis should be given to an explanation of the main alternative sites studied by the applicants”.

Consideration of the alternative sites is included within the Needs Study, which is described as an “Additional Document” “enclosed with the ES” in Part 2 of the Environmental Statement. The only specific environmental assessment of the short-listed alternative sites is contained within Appendix G to Technical Report 6 of the Needs Study. This comprises a very brief assessment of a limited number of environmental impacts, which have been appraised within the NATA process for the assessment of transport schemes. We wonder if this meets the requirements of either the Guide or your Council’s scoping opinion, not least due to omissions in the appraisal, for example in respect of noise, for which no information has been provided.

Omissions in the Part 3 Reports

We have not yet examined in detail all the Part 3 reports within the Environmental Assessment. However, the scoping opinion requires the consideration of a number of specific issues and our preliminary assessment is that these are deficient or missing in a number of significant respects.

The scoping opinion requires that “social infrastructure assessment should be a separate topic from the economic and land-use impact of the scheme”. We can find no evidence that this has been presented. Chapter 2: Economic Impact concentrates on employment issues, while Chapter 3: Population Impact does not reach any conclusions regarding social infrastructure. We are concerned that the impact on neighbouring employment areas, which can be expected to be especially significant in a part of the County with very low rates of unemployment, has not been analysed critically. We are also concerned that the environmental and social issues arising from the movement of labour into the locality, either permanently or on a daily basis, have been given insufficient attention.

The requirements of the scoping opinion in respect of traffic and transport assessment have partly been addressed within the Transport Assessment, but we can find no mention of the potential impact of the proposals on air freight movement and associated road movement in the region and particularly in respect of Luton Airport, which is a specific requirement.

The scoping opinion requires the preparation of a land contamination (and hydrology) assessment. Paragraph 10.74 of Chapter 10: Ground Conditions concludes that further ground investigation works are required prior to development of the study site and use of Areas 5 to 8 for Country Park purposes. It is also acknowledged that the planning process may require further ground investigations. We contend that this assessment fails to meet the requirements of the Environmental Impact Assessment, since the further investigations acknowledged to be required may reveal significant environmental information which could impact on the proposals as a whole and, in the case of the mitigation areas, on their suitability for the wildlife conservation and recreation proposals outlined.

We can find no reference in Chapter 4: Landscape and Visual Impact Assessment to the impact of the development on the neighbouring Park Street Conservation Area, as required by the scoping opinion, and only very brief reference to the impact on the City of St Albans.

Cumulative Impact Assessment

The scoping opinion requires an assessment of the impact of the proposals in association with other developments proposed but not implemented in the surrounding area. More specific requirements are set out in a letter from St Albans City and District Council to CgMs Consulting dated 25th October 2004: these require the balance of development at Napsbury Hospital and four other proposals to be included in this assessment. We have not (yet) located this part of the Environmental Statement.

Selected Comments on Part 3 Reports

We have not yet fully examined the content of these reports, but wish to make selected comments on some of these as follows:

Openness of the Green Belt

As would be expected the scoping opinion requires an assessment of the proposals on the openness of the Green Belt. Chapter 4: Landscape and Visual Impact Assessment concludes that in Area 1 there will be significant adverse effects on the openness of the area, in Area 2 openness will be adversely affected by the railway, and in Area 8 the proposed sports pavilions and pitches will affect the openness of the area. The Chapter concludes that this impact would be offset by so-called visual gains in the other mitigation areas, which cover a larger area than those areas adversely affected.

We suggest that:

- the impact on the openness of the Green Belt should be assessed on an area by area basis
- the adverse impact of the development proposals cannot be seen to be offset in terms of like-for-like exchange for some enhancement in visual quality of land elsewhere which is already in the Green Belt.

Ecological Impacts

Chapter 5: Ecology sets out a number of issues relating to the impact of the proposals on protected habitats and species. At this stage we have three points to make about this Chapter:

- in our view the nature conservation value of the River Ver is underestimated and the potential for substantial damage to its physiography and ecology during and after the development stage of the proposals is understated
- we dispute the acceptance of the inevitability of habitat decline within the SRFI site due to restoration proposals

- in our view there is an over-reliance on the potential for mitigation measures to compensate for the loss of significant habitats within the affected areas.

Proposed mitigation measures

Paragraph 5.198 boldly states that “any remaining breeding birds being displaced from the SRFI Development Site will be accommodated along with winter birds in safeguarded areas of the Country Park by provision of habitat enhancement and management specifically for the species concerned”. We contend that this effect is not guaranteed. For example, the SRFI site is much larger than any of the “mitigation” sites: site size can be a significant factor in the successful establishment of bird populations, as can even minor differences in site factors such as water quality and availability of food. Similar uncertainty inevitably exists for mitigation measures proposed for other protected species such as Great Crested Newts and bats.

Complex mitigation measures are proposed to protect the watercourses throughout the site and beyond from damage. These rely on good design and more importantly complete implementation to succeed. We are concerned that in a development of this scale there would be considerable potential for errors and accidents.

Habitat decline in the SFRI site area

Appendix 5.A.3 outlines in more detail the contention within Chapter 5 that restoration plans for the SRFI site will cause an inevitable decline in the habitat value of the area, such that loss of much of the area to development can be justified. This information requires more analysis, but we wish to point out that this habitat decline would appear not to be inevitable if appropriate management measures can be taken, and potentially damaging proposals averted or reversed.

The River Ver

The Ver is a Chilterns dip slope chalk river designated throughout its length to its confluence with the River Colne. As such it is a habitat type of principal importance in England under Section 74 of the Countryside and Rights of Way Act 2000, and a priority habitat in the UK Biodiversity Action Plan (ODPM Circular 06/2005). Such rivers maintain very high diversity when in good condition. Paragraph 35 of “Environmental Impact Assessment: Guide to Procedures” states that “developers should consider ...whether an assessment of environmental effects may also be required under another European Community Directive”. No mention appears to have been made in the Environmental Statement of the European Union Water Framework Directive 2000, which extends water protection to all waters, especially those environmentally damaged or under threat, and therefore applies in this case.

In our view paragraph 5.46 of Chapter 5: Ecology does not adequately state the conservation status of the River Ver. Paragraphs 5.124 to 5.130 outline the potential for damage to the River. Paragraph 5.196 states that there is “high confidence that all potential impacts on the River Ver will be adequately mitigated”: this suggests a degree of doubt as to a successful outcome.

We are particularly concerned about the likely impact on the River Ver, and on the River Colne into which the Ver flows, of development proposals of this scale, which will have a huge impact on the hydrology of the locality. This is admitted in Chapter 8: Water Resources and Infrastructure, for example in paragraph 8.15: “some areas of the site are likely to be re-graded in order to create plateaux for the warehouse development. The re-grading operation and landscape bunding will affect the existing watersheds and sub-catchments within the site”. Paragraphs 8.68 to 8.90 refer to further potential sources of damage to the physical, chemical and biological balance of the river systems. Even one pollution incident could have a long-lasting effect on the ecology of a river, and

a change, especially an increase in volume, in the sediment load of a river can have far-reaching and long-lasting effects on its ecology and morphology which might be impossible to rectify.

Planning application 5/06/1680 – Proposed Rail Freight Interchange, North Orbital Road, St Albans (former Radlett Aerodrome site)

The Need Case for a Strategic Rail Freight Interchange: Policy Context

Comments by CPRE – The Hertfordshire Society

1. Technical Report 2 of the application documents sets out the national and regional policies which, in the applicants' view, support the development of rail-based facilities for the interchange of freight between road and rail. What we seek to demonstrate in this paper is that these national and regional policies do not support the development of a strategic rail freight interchange (SRFI) specifically at the former Radlett Aerodrome site.

National Planning and Transport Policies

2. We accept in principle that the transfer of freight from road to rail is a desirable objective in economic, social and environmental terms, and that this is Government policy. The Government's *Sustainable Distribution Strategy* (March 1999) sets out the policy framework and identifies the need, nationally, for major rail freight interchanges in the form of distribution 'hubs'. Planning Policy Guidance 13 (PPG13) *Transport* advises that, in preparing development plans and determining planning applications, local authorities should identify and, where appropriate, protect sites and routes, both existing and potential, which could be critical in developing infrastructure for the movement of freight, such as major interchanges.

3. PPG13 goes on to say, however, that freight movements serving developments near to residential areas, and operational restrictions necessarily imposed on them, can have the effect of exacerbating congestion during peak times and increasing local pollution. *"Policies need to strike a balance between the interests of local residents and those of the wider community, including the need to protect the vitality of urban economies, local employment opportunities and the overall quality of life in towns and cities. Local authorities, freight operators, businesses and developers should work together, within the context of freight quality partnerships, to agree on lorry routes and loading and unloading facilities and on reducing vehicle emissions and vehicle and delivery noise levels, to enable a more efficient and sustainable approach to deliveries in such sensitive locations."* (PPG13, paragraph 46).

4. We can find no evidence that the applicants have complied with the requirements of PPG13 with regard to working with the local authorities (in this case, primarily St Albans City and District Council, but, it could be argued, also Hertfordshire County Council and other neighbouring authorities) in the context of a freight quality partnership in order to identify the most appropriate location for a rail freight interchange of the kind proposed. We acknowledge that there have been discussions between the applicants and the District Council over a period, but, so far as we are aware, these have been on the applicants' terms and have been based on the pre-determined premise that the Radlett Aerodrome site is the most suitable.

Strategic Rail Authority Policy

5. The applicants imply, in paragraph 2.3.3 of Technical Report 2, that the Strategic Rail Authority's *Midland Main Line/East Midlands Route Utilisation Strategy* (March 2004) specifically supports a rail freight interchange at Radlett by the statement that "*a major strategic freight interchange site has been identified at Radlett (on the site of the former aerodrome) that has the potential to develop within 5-10 years and will feature in the SRA's Freight Interchange Policy*". In fact, what the SRA document actually says is that Radlett is one of a number of options (Cricklewood is another) that may need to be included in future freight capacity reviews. The SRA did not, therefore, single out Radlett as the preferred option for a strategic rail freight interchange.

6. The applicants rely even more heavily on the SRA's *Strategic Rail Freight Interchange Policy* (March 2004), quoting paragraph 6.9 of the SRA document, that sufficient SRFI capacity for London and the South East would be met by three or four new SRFI, supplemented by smaller locations within the M25 ring, and that suitable sites were likely to be located where the key rail and road radials intersect with the M25. However, this SRA document sets a number of criteria to be taken into account when assessing the suitability of sites for an SRFI, including:

- good connections with the primary road network (paragraph 4.22)
- high quality links to the rail network (paragraph 4.23)
- the layout should minimise the need for on-site rail shunting and provide a configuration which will enable main line access for full length trains from either direction (para 4.32)
- SRFIs may not be considered suitable adjacent to uses such as residential (paragraph 4.24)
- the presence of an available and economic workforce (paragraph 4.26).

We contend that this application proposal does not meet these criteria, because:

- direct access to the adjacent M25 is not permitted (Government policy), and the alternative routes to the motorway network via the A414, A405, A1081 and M10 are unsatisfactory;
- the links to the rail network are unsatisfactory because the Midland Main Line is highly congested and the proposed rail access to the site allows for one-direction working only;
- the site is close to the residential area of Park Street – Frogmore, which will be severely affected by noise and pollution; and
- the current unemployment rate in St Albans is just over 1%, which means that the estimated 3,000 jobs that will be created when the site is fully operational will both impact on the local labour market and draw in new workers from a wide area, either to live (in the unlikely event that they could afford local house prices) or as commuters.

We will submit further evidence on these issues in subsequent papers to be submitted.

Regional Policy Guidance

7. The applicants seek to use the draft East of England Regional Spatial Strategy in support of the proposal. Policy T3 of the draft Plan states, in very general terms:

“Existing well located wharves and facilities for rail and water freight interchange should be safeguarded, and improved provision made in locations with good road and rail access to end users.”

As stated above, we do not believe that the Radlett site has the good road and rail access envisaged in this policy.

8. Nevertheless, Helioslough Ltd, in their submission to the East of England Plan Examination in Public, sought to have draft Policy T3 and the supporting text amended in their favour by the addition of *“...including a strategic rail freight interchange (SRFI) within the M25 North West sector”* and *“A number of studies have identified the potential of Radlett Aerodrome to provide additional freight interchange capacity, and if approved, this will meet the requirement for an SRFI within the M25 North West sector.”* at the beginning of paragraph 8.19.

9. The EiP Panel Report has recently been published. On the issue of strategic freight interchange, the Panel has not accepted Helioslough’s proposed amendments, but has recommended the inclusion of a new Policy T10 which includes the requirement *“provision will be made for at least one strategic rail freight interchange within the East of England, at a location with good access to the strategic rail routes and highway network”*. This is a long way from indicating or recommending that an SRFI to serve north London and the East of England should be located at Radlett.

10. An SRFI for this purpose needs to be identified and agreed in principle through the mechanism of the Regional Plans for London, the South East and the East of England jointly. The draft Supplementary Planning Guidance for London *Land for Transport Functions*, referred to by the applicants in paragraphs 2.6.4 - 2.6.6 of Technical Report 2, may well recommend three or four SRFIs around the M25 ring, but that does not pre-suppose that one of them should be located at Radlett. Until the Regional Plans for London, the South East and the East of England have been completed and there has been a detailed comparison exercise across them on the issue of strategic freight interchange, it is premature, in our view, for one particular site to be approved in advance of firm proposals for the other potential sites being known.

Structure Plan and Local Plan Policy

11. The support given in the Hertfordshire Structure Plan Review (1998) to the idea of rail freight terminals is in very general terms and pre-dates any of the more detailed work which has been done on this issue.

12. The St Albans District Local Plan Review (adopted 1994) does not contain any policies relating to a rail freight interchange. However, Policy 143 concerning the Upper Colne Valley, which covers the aerodrome site, states in section UCV.3 that, following the mineral working and restoration of Radlett Aerodrome, the land should be put to low or medium intensity leisure use. We consider that this is an appropriate long-term use for this site, which would also satisfy the purposes of the land being included in the Metropolitan Green Belt, in accordance with PPG2 and Local Plan Policy 1.

Conclusions

13. While national planning and transport policies favour the development of strategic rail freight interchanges, there is a recognition in them that a balance must be struck between the interests of local residents and the wider community. In our view, an appropriate balance has not been struck in

this case. Nor has there been an appropriate dialogue between the developers, freight operators and businesses on the one hand and all the relevant local authorities on the other about the suitability of the Radlett site as an SRFI.

14. The Strategic Rail Authority (now Department for Transport) accepted that a number of SRFIs would be needed in London and the South East, but did not specifically recommend Radlett as one of the preferred locations. The SRA set a number of operational, economic and environmental criteria for the assessment of potential SFRI sites, which we believe have not been adequately met in this case.

15. Draft regional policy guidance indicates that three or four SRFIs may be needed around the M25 ring, and that one of these may be provided in the East of England Region. Until the inter-related regional spatial strategies have been completed and a comparison exercise carried out, however, it would be premature for the Radlett site to be approved.

16. As matters stand at present, the Radlett proposal conflicts with Local Plan policy concerning, amongst other issues, the Green Belt and the preferred future use of the Radlett site.

Planning Application 5/06/1680 – Proposed Rail Freight, Public Open Space and Community Forest Sites, North Orbital Road, St Albans

Comments by CPRE – The Hertfordshire Society on the Public Open Space and Community Forest aspects of the scheme

1. The planning application is described in the Development Specification Document as being for:

Construction of a Strategic Rail Freight Interchange comprising an intermodal terminal and rail and road served distribution units (331,665m² in Use Class B8 including ancillary B1/B2 floorspace) within Area 1, with associated road, rail and other infrastructure facilities and works within Areas 1 and 2 (including earth mounds and a Park Street/Frogmore relief road) in a landscaped setting, and further landscaping and other works within Areas 3 to 8 inclusive to provide publicly accessible open land and community forest.

2. It is clear from the documents submitted that the main purpose of the outline planning application is the development of the former Radlett Aerodrome site as a Strategic Rail Freight Interchange. The proposals for public open space and community forest areas in the form of a country park are entirely ancillary to the main purpose, and may be regarded as being a ‘sop’ to make the primary proposals look more attractive.

3. Much of the Design and Access Statement is devoted to the premise that almost two-thirds of the site (247 out of 419 hectares) will be turned into a country park to compensate for the development of the strategic rail freight interchange. The applicants identify eight individual areas of land, which they term “a series of inter-related parcels”. Of these, Areas 1 and 2 are designated as “the Development Site”. The remaining six areas constitute the “country park”. However, for Helioslough to claim that the country park is “to compensate for the loss of open land and its uses arising from the SRFI proposals” and that “for every hectare of distribution unit there will be one and a half hectares of improved countryside” is misleading.

4. These eight sites are only inter-related because Helioslough have linked them together in this planning application:

Areas 1 and 2 are adjacent to each other, though divided by the railway line;
Areas 3 and 4 are also adjacent to each other, to the north of Park Street Village;
Area 5 is separated from the others by the Park Street Village Conservation Area;
Area 6 is on the other side of the M25 motorway;
and Areas 7 and 8 are isolated pieces of land to the east of the former Aerodrome site.

5. The proposals for Areas 3 – 8 add no value beyond the existing status quo. Taken together they already constitute a de facto ‘country park’, inasmuch as they consist of open green space and farmland within the Watling Chase Community Forest, with considerable public access through a well developed network of public footpaths and bridleways.

6. All these areas are covered by policies in the adopted St Albans District Local Plan which would ensure that they were not developed. All are designated Green Belt and Landscape Development Areas. In addition, all the sites fall within the Upper Colne Valley (Policy 143 of the Local Plan) and are proposed for low and medium intensity leisure, agricultural or amenity uses. Two are sites of archaeological significance, one is in a conservation area and one contains a site of special scientific interest. There is therefore very little prospect of these areas being permitted to be used for any other purposes, and it is disingenuous of Helioslough to claim that their proposals will ‘protect’ them from unwanted development and compensate for the proposed development of the former Aerodrome site. They are not part of that development and should not be linked to it: to do so would create a dangerous precedent.

7. As is clear from the Development Specification Document, Helioslough’s material proposals are centred on Areas 1 and 2 - the “Development Site”, and consequently consideration of this outline application should be limited to that core area. Even here, specific policies in the Local Plan apply. The former Radlett Aerodrome site, UVC.3 under Policy 143 of the Local Plan, has been worked for sand and gravel and restored to agricultural use, and is proposed for low and medium intensity leisure use, including water sports.