

# LOCAL PLAN SUB-COMMITTEE

## NOTICE AND AGENDA

For a meeting to be held on Thursday, 24 August 2023 at 7.00 pm in the Penn Chamber, Three Rivers, Northway, Rickmansworth.

Members of the Local Plan Sub-Committee:-

Councillors:

Stephen Giles-Medhurst (Chair)  
Oliver Cooper  
Stephen Cox  
Steve Drury  
Rue Grewal  
Philip Hearn

Matthew Bedford (Vice-Chair)  
Chris Lloyd  
Chris Mitchell  
Sarah Nelmes  
Phil Williams

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*Joanne Wagstaffe, Chief Executive*  
16 August 2023

The Council welcomes contributions from members of the public on agenda items at the Local Plan Sub-Committee meetings. Details of the procedure are provided below:

For those wishing to speak:

Members of the public are entitled to register and identify which item(s) they wish to speak on from the published agenda for the meeting. Those who wish to register to speak are asked to register on the night of the meeting from 6.30pm. Please note that contributions will be limited to one person speaking for and one against each item for not more than three minutes.

Those wishing to observe the meeting are requested to arrive from 6.30pm.

In accordance with The Openness of Local Government Bodies Regulations 2014 any matters considered under Part I business only of the meeting may be filmed, recorded, photographed, broadcast or reported via social media by any person.

Recording and reporting the Council's meetings is subject to the law and it is the responsibility of those doing the recording and reporting to ensure compliance. This will include the Human Rights Act, the Data Protection Legislation and the laws of libel and defamation.

**1. APOLOGIES FOR ABSENCE**

To receive any apologies for absence.

**2. MINUTES**

To confirm as a correct record the minutes from the Local Plan sub-committee meeting held on 3 August 2023 – to follow

**3. NOTICE OF OTHER BUSINESS**

Items of other business notified under Council Procedure Rule 30 to be announced, together with the special circumstances that justify their consideration as a matter of urgency. The Chair to rule on the admission of such items.

**4. DECLARATION OF INTERESTS**

To receive any declaration of interests.

**5. LOCAL PLAN – MODERATE-HIGH HARM AND HIGH HARM STRATEGIC GREEN BELT SITES AND NEWLY SUBMITTED SITES**

(Pages 5  
- 170)

This report sets out the Regulation 18 strategic sites of circa 500 dwellings or more that fall into areas of moderate-high to high Green Belt harm and whether the benefits of these sites in terms of sustainability and infrastructure provision potentially outweigh the harm to the Green Belt of removing these sites for development, following the approach agreed at the 13 June 2023 Local Plan Sub-Committee.

The report also considers a strategic site that falls into low to moderate harm, one smaller low to moderate Green Belt harm site that required some additional work from officers as well as a C2 care home site that falls into moderate-high Green Belt harm.

At the 13 June 2023 Local Plan Sub-Committee it was agreed that no sites that fall within areas of very high Green Belt harm would be considered acceptable even if

A number of new sites were submitted as a result of the Regulation 18 Additional Sites for Potential Allocation consultation earlier this year and one site was submitted through the brownfield call for sites exercise. These sites have been assessed and are discussed later in the report.

**6. OTHER BUSINESS - if agreed under item 3 above**

**7. EXCLUSION OF PRESS AND PUBLIC**

If the Sub-Committee wishes to consider the remaining items in private, it will be appropriate for a resolution to be passed in the following terms:-

“that under Section 100A of the Local Government Act 1972 the press and public be excluded from the meeting for the following item(s) of business on the grounds that it involves the likely disclosure of exempt information as defined

under Paragraphs 1 to 7 of Schedule 12A to the Act. It has been decided by the Council that in all the circumstances, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.”

**8. OTHER BUSINESS - If approved under item 3 above.**

**Livestreaming details**

To watch the meeting live please click onto the livestreaming link below: - revised details:

[https://teams.microsoft.com/join/19%3ameeting\\_MjQzNjgyNzgtZTJjZi00NDU4LWI1ZDktZjI5YjY1MmY1Zjcx%40thread.v2/0?context=%7B%22Tid%22%3A%2258420664-1284-4d81-9225-35da8165ae7a%22%2C%22Oid%22%3A%2258c99d6e-8c11-4f06-9519-c296e92897fc%22%2C%22IsBroadcastMeeting%22%3Atrue%2C%22role%22%3A%22a%22%7D&btype=a&role=a](https://teams.microsoft.com/join/19%3ameeting_MjQzNjgyNzgtZTJjZi00NDU4LWI1ZDktZjI5YjY1MmY1Zjcx%40thread.v2/0?context=%7B%22Tid%22%3A%2258420664-1284-4d81-9225-35da8165ae7a%22%2C%22Oid%22%3A%2258c99d6e-8c11-4f06-9519-c296e92897fc%22%2C%22IsBroadcastMeeting%22%3Atrue%2C%22role%22%3A%22a%22%7D&btype=a&role=a)

**General Enquiries: Please contact the Committee Team at**  
[committeeteam@threerivers.gov.uk](mailto:committeeteam@threerivers.gov.uk)

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Three Rivers District Council  
**Sub-Committee  
Report**

24 August 2023

**LOCAL PLAN SUB-COMMITTEE - 24 AUGUST 2023**

**POLICY AND RESOURCES COMMITTEE – 5 OCTOBER 2023**

**PART I – NOT DELEGATED**

**5. LOCAL PLAN – Moderate-High Harm and High Harm Strategic Green Belt Sites and Newly Submitted Sites (DEIP)**

**Summary**

- 1.1 This report sets out the Regulation 18 strategic sites of circa 500 dwellings or more that fall into areas of moderate-high to high Green Belt harm and whether the benefits of these sites in terms of sustainability and infrastructure provision potentially outweigh the harm to the Green Belt of removing these sites for development, following the approach agreed at the 13 June 2023 Local Plan Sub-Committee.
- 1.2 The report also considers a strategic site that falls into low to moderate harm, one smaller low to moderate Green Belt harm site that required some additional work from officers as well as a C2 care home site that falls into moderate-high Green Belt harm.
- 1.3 At the 13 June 2023 Local Plan Sub-Committee it was agreed that no sites that fall within areas of very high Green Belt harm would be considered acceptable even if they are strategic in nature.
- 1.4 A number of new sites were submitted as a result of the Regulation 18 Additional Sites for Potential Allocation consultation earlier this year and one site was submitted through the brownfield call for sites exercise. These sites have been assessed and are discussed later in the report.

**Introduction**

- 2.1 At the 13 June 2023 Local Plan Sub-Committee it was agreed that a Green Belt as a constraint approach would be followed in selecting sites for inclusion in a further round of Regulation 18 consultation on lower housing numbers later this year.
- 2.2 The approach includes sites that were agreed for consultation in the 2021 Sites for Potential Allocation and 2023 Additional Sites for Potential Allocation Regulation 18 consultations that are either urban brownfield sites or that fall into areas of low to moderate Green Belt harm as set out in the Council's Stage 2 Green belt Review. These sites were agreed at the 3 August Local Plan Sub-Committee.
- 2.3 Further consideration now needs to be given to strategic sites, of circa 500 dwellings or more, that fall within areas of higher Green Belt harm where the benefits of these sites in terms of sustainability, access to services and infrastructure provision may outweigh the harm to the Green Belt.
- 2.4 This report seeks agreement from Members to recommend to Policy and Resources committee the strategic sites and one newly submitted brownfield site to be included in a further round of Regulation 18 consultation on lower housing numbers later this year.

## Background

- 3.1 In 2021 the Council consulted on a draft Regulation 18 version of the Local Plan. The document considered preferred policy options and set out the sites that could potentially be allocated for development in the Local Plan.
- 3.2 The Government's standard method for calculating housing need was used to determine the Local Plan housing requirement which at the time came to a requirement of 630 dwellings per annum.
- 3.3 In calculating housing need, a plan period of 2018 to 2038 was used resulting in a total requirement of 12,624 dwellings. Completions, commitments (approved planning permissions) and a windfall allowance were taken off this total leaving a residual target of 10,678. The draft Regulation 18 plan failed to meet this target and planned for 8,973 dwellings, 1,705 dwellings short.
- 3.4 As a result of this consultation a further 18 sites were submitted for the Council's consideration and a further three sites were re-submitted with updated proposals. These sites were assessed and six sites were considered appropriate for potential allocation.
- 3.5 The six sites were consulted on in 2022/23 in the Additional Sites for Potential Allocation document. Adding 825 dwellings to the total. In the meantime, a number of sites were removed or had dwelling capacities altered leaving the deficit to the residual housing target at 1,318 dwellings. This concluded this round of Regulation 18 consultation and the Council needed to then decide whether to press ahead with the Regulation 19 stage or whether to go out on further Regulation 18 consultation considering different levels of growth.
- 3.6 In December 2022 the Secretary of State for Levelling Up, Housing and Communities wrote to MPs about proposed reform to the planning system. A key message set out in the letter was that whilst the standard method for calculating housing need would be retained it should be an advisory starting point, a guide that is not mandatory. They also emphasised that local planning authorities are not expected to review the Green Belt to deliver housing.
- 3.7 Following this the Government consulted on planning reform reiterating that the standard method calculation would remain unchanged at least until they have reviewed the implications on the standard method of new household projections data based on the 2021 Census, which is due to be published in 2024.
- 3.8 The ability for local authorities to use an alternative approach to the standard method where there are exceptional circumstances that can be justified was proposed to be retained. It was however proposed that it would be made clearer in the NPPF that the outcome of the standard method is an advisory starting point to inform plan-making, a guide that is not mandatory. They propose to give more explicit indications in planning guidance of local characteristics that may justify an alternative method. To date no such guidance has been produced. The examples given in the consultation were islands with a high percentage of elderly residents or university towns with an above-average proportion of students, neither of which apply to Three Rivers.
- 3.9 **It should be noted that this was just a consultation and that neither the consultation nor the letter from the Secretary of State constitutes a statement of national planning policy. The National Planning Policy Framework and Planning Practice Guidance remain unchanged and it is to this framework we are required to work.**

- 3.10 At Full Council in December 2022 Members unanimously agreed to add a further round of Regulation 18 consultation to the Local Development Scheme (Local Plan timetable). It was agreed that this further Regulation 18 consultation would be focussed on lower housing numbers than had been consulted on in the previous round of Regulation 18 consultation.
- 3.11 In December 2022 the Secretary of State for Levelling Up, Housing and Communities wrote to MPs about proposed reform to the planning system. A key message set out in the letter was that whilst the standard method for calculating housing need would be retained it should be an advisory starting point, a guide that is not mandatory. It stated it would be up to local authorities, working with communities, to determine how many homes can actually be built, taking into account what should be protected in each area.
- 3.12 The letter went on to state that housing need in itself was not an exceptional circumstance for altering Green Belt boundaries. By stating that Green Belt release is not a requirement in order to meet housing need the Government aims to remove ambiguity about whether authorities are expected to review the Green Belt to meet housing need. Although there have not been any changes yet made to national policy, in making this statement officers believe the Government has already removed this ambiguity to an extent. For this reason, officers believe that the District's Green Belt constraint can now be used as an argument for lower housing numbers.
- 3.13 At the 13 June 2023 Local Plan Sub-Committee Members agreed the approach to housing need and Green Belt where only sites in areas of moderate Green Belt harm or less, as set out in the Stage 2 Green Belt Review, are considered acceptable for residential development (subject to other considerations) unless the site is considered strategic and the benefits of the site are considered to outweigh the harm caused by its release from the Green Belt.
- 3.14 At the 3 August 2023 Local Plan Sub-Committee the sites falling within the urban area and low to moderate harm Green Belt sites were agreed to be recommended to the Policy & Resources Committee for inclusion in a further round of Regulation 18 consultation.

## **Details**

- 4.1 A presentation will be given at the 24 August Local Plan Sub-Committee on the strategic sites to aid Members in their consideration of the sites. Officers will run through the summary slides at the Sub-Committee meeting providing the criteria that Members should consider when making decisions on sites, a summary of site details, a summary of their performance in the Sustainability Appraisal and Sustainability Appraisal Working Note (appendices 3 and 4).
- 4.2 To assist with Members' decisions regarding the additional sites the presentation will also set out the criteria that Members have to consider in reaching a decision to comply with national policy. This includes taking into consideration the technical assessment of the sites through the SHELAA, the sustainability of the site, it's access to services, and the spatial strategy.
- 4.3 It should be noted that the sites recommended for inclusion in the Regulation 18 consultation on lower housing numbers have been determined to be suitable for development through the site assessment process of the Strategic Housing and Employment Land Availability Assessment (SHELAA) which has been informed by the evidence base studies. This means that policy and physical constraints (such as flood risk, Local Wildlife sites, TPOs, potential effects on landscape,



historic environment etc.) have already been considered and it has been determined that the sites are suitable for development.

- 4.4 The environmental, economic and social credentials of the development options and policies in the emerging Local Plan have been subject to a Sustainability Appraisal (SA) and is a process undertaken at various stages of the Local Plan process. The SA plays an important role in demonstrating that the Local Plan reflects sustainability objectives and has considered all reasonable alternatives. It incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive.
- 4.5 As previously reported to the Local Plan Sub Committee there is a legal requirement for the Council to consider the Sustainability Appraisal when making decisions on both policies and sites to be allocated for development.
- 4.6 In order to assist Members, the summary slides will include a table that summarises the assessment of each site against the SA objectives. The detail of the assessment is in the Sustainability Appraisal Report (June 2021) and Sustainability Appraisal Working Note (November 2022).

Significance Assessment	Description
✓✓	The option is likely to have a significant positive effect
✓	The option is likely to have a positive effect which is not significant
?	Uncertain – It is uncertain how or if the option impacts on the SA/SEA objective
-	Neutral – The option is unlikely to impact on the SA/SEA objective
x	The option is likely to have a negative effect which is not significant
xx	The option is likely to have a significant negative effect
✓/x	The option is likely to have some positive and some negative effects, none of which are significant

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site XXX	x	?	?	✓	-	x	-	-	x	✓	✓	✓	✓	-	-

- 4.7 Each site under consideration for allocation in the new Local Plan has been individually assessed in terms of its accessibility to services. This has been achieved through an approximate distance measurement between potential housing sites and the location of the service. The distance measurement is taken

from the centre point of the site, assumes a flat terrain and direct route as a result of the difficulty in mapping these aspects. It is recognised that in reality this may not be the case and further work will be undertaken in terms of access to services and fed back into the Regulation 19 stage of the plan-making process.

4.8 In order to determine levels of access to services, the following distance thresholds<sup>1</sup> have been used between housing and services, under which the service may be considered accessible.

4.9 **Table 3: Accessibility ideal standards:**<sup>2</sup>

Service	Distance Threshold
Stations	800m – 1600m
Primary Schools	400m - 800m
Secondary Schools	1600m - 3200m
GP Surgeries	800m – 1600m
Convenience shops	800m - 1600m
Open Spaces	400m – 800m
Convenience shops	800m – 1600m
Open Spaces	400m – 800m

4.10 Details of the distances and/or thresholds to existing services, have been provided in the site summaries.

4.11 In the consideration of sites, Members should take account of the infrastructure and services that are proposed to be provided on site as well as the accessibility to existing services.<sup>3</sup>

4.12 The SHELAA assessments and SA report and working note for the sites is contained in the appendices to this report. The Green Belt Reviews, SHELAA methodology and other evidence base studies were published alongside the previous Regulation 18 consultations and are available to view on the Council's website at:

<https://www.threerivers.gov.uk/services/planning/planning-policy/new-local-plan#Evidence%20base>

4.13 The strategic sites agreed by Members of the Local Plan Sub-Committee to be recommended to the Policy & Resources Committee for inclusion in the Regulation 18 consultation on lower housing numbers will be reported to the Policy & Resources Committee as part of the whole consultation document

<sup>1</sup> As was the case for the 2021 Regulation 18 consultation, the distance thresholds are based on Three Rivers Access to Services Study 2007, Barton, H. et al (1995), Sustainable Settlements: a guide for planners, designers and developers, UWE, Bristol and DETR (2001) PPG13: Transport, HMSO, London

<sup>2</sup> Important facilities to which people can usually be expected to walk to should be a maximum of 400m away. Local facilities which are ideally accessible by foot should be a maximum of 800m away.

Local facilities to which it is not reasonable to expect all people to walk to, but which could be walked to by those who choose should be a maximum of 1600m away. Facilities which are less local but should be within cycling distance should preferably be within 5000m, and no more than 8000m away.

<sup>3</sup> A site that is outside the accessibility thresholds of an existing service/facility may be capable of providing that service/facility on site.

together with the sites agreed by Members at the 3 August Local Plan Sub-Committee.

- 4.14 Appendices 5 and 6 provide summaries of the statutory consultee comments and non-statutory consultee comments respectively to the 2021 Sites for Potential Allocation and 2023 Additional Sites for Potential Allocation consultations. Not all the sites included in the report received relevant comments and therefore not all the sites are included in the summaries.

**Strategic Sites recommended for consultation:**

- 5.1 All the strategic sites will contribute significantly to overall housing need for the area and will play an important role in helping deliver much needed affordable housing and infrastructure. All these strategic sites will be expected to be fully policy compliant with the policies in the emerging Local Plan. As such, they will need to meet the Council's housing mix, environmental and biodiversity standards.

CFS26c West of Kings Langley Estate (station side) – 893 dwellings

- 5.2 This is a greenfield site in the Green Belt, currently in agricultural use. It falls within a land parcel assessed in the Stage 2 Green Belt Review that would result in high harm to the Green Belt if removed for development. The site is strategic in scale and its development would support a high level of infrastructure provision. It is considered that the strategic advantages of the site justify the high harm to the Green Belt in releasing the site.

- 5.3 The site is considered to be in a sustainable location with potentially good access to Kings Langley mainline station and as such is considered suitable for higher density development. It has relatively good access to services with local shops and rail station within the lower threshold distance and secondary schools, GP surgeries and open spaces within the upper threshold distance.

- 5.4 The site falls within the Chiltern Beechwoods Special Area of Conservation (SAC) Zone of Influence. Natural England would require further consultation and the provision of Suitable Alternative Natural Green Space (SANG). The site promoters are happy to provide a SANG site adjacent to the development site, designed as a country park with visitor parking, circular walking routes and dog walking areas. New multi-functional open spaces will be created which will be accessible to existing and new communities and could include play areas, formal sports provision, kick about space and allotments.

- 5.5 The site will be required to provide a primary school in line with Hertfordshire County Council's education requirements. There is also potential to provide a health centre on site.

- 5.6 The promoters have stated that there are opportunities to improve bus frequency and provide routing enhancements. A range of new walking and cycling routes would be provided within the site linking to existing walking and cycling routes surrounding the site giving active access to services and facilities. These interventions would be required as sustainable transport mitigations as raised in Hertfordshire County Council's consultation responses. There are also concerns about access to the site due to limited access possible coming from Kings Langley due to the width under the railway bridge.

- 5.7 CFS8d Notley Farm, Abbots Langley – 450 dwellings

- 5.8 The site falls into an area of moderate-high Green Belt harm, and although is below the circa 500 dwelling threshold for strategic sites is being considered alongside the other strategic sites.
- 5.9 The scale of development limits the amount of benefits the site can provide, however it has good access to local services and facilities. The promoters have proposed an extension to Leavesden Country Park as well as improvements to the adjacent allotments. There is potential to provide health facilities on site if needed.
- 5.10 The site falls within the Chiltern Beechwoods Special Area of Conservation (SAC) Zone of Influence. Natural England would require further consultation and the provision of Suitable Alternative Natural Green Space (SANG) to mitigate the effect on the SAC. This can be delivered through the proposed country park.
- 5.11 Access to the site would need to be resolved for the site to come forward, as things stand there aren't the access options to support a development of this scale. Hertfordshire County Council have raised concerns about a lack of sustainable transport options, these would need to be addressed as part of the proposal.

#### OSPF22 Batchworth Golf Course – 618 dwellings

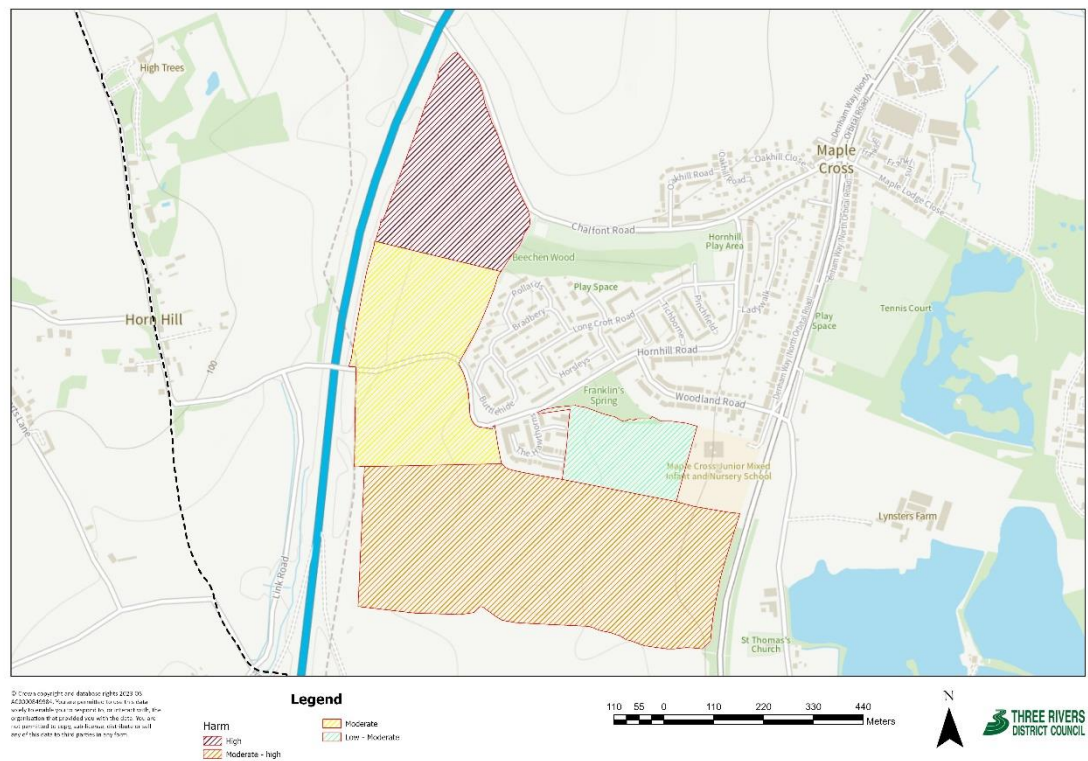
- 5.12 The site is a greenfield site in the Green Belt, the majority of the site falling within an area of high harm within the Green Belt with a small area around the club house assessed as moderate-high harm. The southern portion of the site falls beyond the area assessed in the Green Belt Review, however the Green Belt Review states that any land beyond the areas assessed would be at least high harm to the Green Belt. This portion of the site is proposed for open space rather than built development.
- 5.13 The site is located on the edge of Rickmansworth, the District's principal town as set out in the settlement hierarchy. The Council's spatial strategy aims to focus a higher proportion of development within the principal town.
- 5.14 The site is within walking and cycling distance of Rickmansworth town centre and is therefore considered to be in a sustainable location. The site would have good access to services with secondary schools, shops, and open spaces within the lower threshold. Primary schools, GP surgeries and a rail station within the upper threshold.
- 5.15 The site will be required to provide a primary school in line with Hertfordshire County Council's education requirements. The promoters are proposing community facilities, allotments and public open space to be provided.
- 5.16 The site promoters are proposing to provide housing for the elderly, helping to meet an identified need within the District. The Local Housing Needs Assessment is currently being updated and early results show an unmet need for extracare housing bridging the gap between retirement villages and C2 care homes.
- 5.17 Issues raised through previous consultation responses included Hertfordshire County Council requiring a bus loop into the site making it more sustainable in transport terms. Historic England have concerns about the effect the site would have on the rural setting of Moor Park. Sports England object to the loss of a golf facility which is supported by members of the golf club. The Council's Open Space, Sport & Recreation Study sets out that existing golf course provision is

sufficient in the District, however any loss of facilities would need to be addressed. Members of the golf club have raised that there is an existing long-term lease in place. This would need to be resolved prior to the Regulation 19 stage of the plan making process in order for the site to be considered available.

- 5.18 It should be notes that not all of the red line area of the plan would be removed from the Green Belt, with the southern portion of the site proposed as open space.

EOS12.2 Land to the west and south of Maple Cross – 1500 dwellings

- 5.19 The site is a greenfield site within the Green Belt. The site is located in four parcels (please see plan below) which were assessed in the Stage 2 Green Belt Review. Harm to the Green Belt of releasing the northern part of the site was assessed as high. Harm to the Green Belt of releasing the central part of the site, i.e. the land adjacent to north and south of Hornhill Road, was assessed as moderate. Harm to the Green Belt of releasing the southern part of the site was assessed as moderate-high. Harm to the Green Belt of releasing the north-eastern parcel of the site, adjacent to Franklin’s Spring, was assessed as low-moderate.



- 5.20 The sections of the site that fall within low to moderate harm, shaded in yellow and green on the above plan, would potentially be able to provide 850 dwelling whereas the whole site could provide around 1,500 dwellings. The 850 dwelling number could potentially be further reduced in order to deliver onsite infrastructure provision.

- 5.21 The site promoters are proposing a new local centre benefitting existing (and new residents) in Maple Cross and an extension to the existing primary school in line with Hertfordshire County Council’s requirements. They are also proposing a new and improved public transport service, through extending and enhancing existing routes and a care home.

- 5.22 The development will focus on sustainable and healthy living with a biodiverse network of green infrastructure, public open space including a linear park with enhanced cycle and walking connections.
- 5.23 Officers recommend the full site coming forwards as it is considered that the full range of benefits coming from this scale of development will make the site more sustainable. There is concern that the smaller scale of the site will lead to difficulties in providing the required sustainable transport mitigation in terms of viability reducing the sustainability of the location. The other afore mentioned benefits would also potentially be reduced.

EOS7.0 Land to the south of Shepherds Lane and east of M25 – 550 dwellings

- 5.24 The site is a greenfield site in the Green Belt, falling into an area of moderate Green Belt harm as assessed by the Stage 2 Green Belt Review. As such, it fits into the Council’s approach to Green Belt and housing need. The site is strategic in scale and is therefore being considered alongside the other strategic sites.
- 5.25 The site is well contained by existing built development and the M25 motorway. It has good access to services with a secondary school, local shops and open spaces all within the lower threshold. Primary school and GP surgeries are within the upper threshold, and it is also near leisure facilities. A primary school or a GP surgery can be provided on site to meet additional needs created by the site. It is connected by bus to Rickmansworth mainline train station / underground station.

CFS59 Land on London Road – 75 bed care home equivalent to 40 dwellings

- 5.26 The site is not strategic in scale and falls within an area of moderate-high Green Belt harm. As such, it does not meet the agreed approach to Green Belt and housing need. However, the site has potential to come forward together with strategic site OSPF22 Batchworth Golf Course if Members agree to take it forward for consultation.
- 5.27 If the Batchworth Golf Course site does not come forward, then the site should still be considered for inclusion as the care home use would help meet an identified need in the District.

CFS18c Hill Farm Stag Lane – 38 dwellings

- 5.28 The site is not strategic in scale but falls within an area of low Green Belt harm. The previous version of the site covering the full extent of the low Green Belt harm area resulted in only one access point onto a thin lane, and the 150 dwellings proposed on site is considered to be high for the location. As such, the site has been further reduced to focus on the previously developed part of the site around Hill Farm providing 38 dwellings.

**Table 1: Strategic sites recommended for consultation**

Site Ref.	Site Name	Dwellings
CFS26c	West of the Kings Langley Estate (station side)	893
CFS8d	Notley Farm, Abbots Langley	450
OSPF22	Batchworth Golf Course	618

EOS12.2	Land to the west and south of Maple Cross (full site)	1500
EOS7.0	Land to the south of Shepherds Lane and east of M25	550
CFS59	Land on London Road	40
CFS18c	Hill Farm, Stag Lane	38
	<b>Total</b>	<b>4,089</b>

### Strategic Sites not recommended for consultation

#### EOS12.4 Land to the west and south of Maple Cross – 850 dwellings (low to moderate harm sections of the site only)

- 6.1 Site EOS12.4 has been considered in paragraphs 5.13 to 5.17 of this report alongside the full site scheme. Setting out the reasons officers consider that the 1,500 dwelling version of the site (EOS12.2) is being recommended rather than the 850 dwelling version.

#### EOS4.0/PCS21/CFS6 Land adjacent to Bedmond Road & South of M25 Abbots, Langley (combined sites) – 514 dwellings

- 6.2 It was suggested by Hertfordshire County Council that sites EOS4.0, PCS21 and CFS6 be combined in order to offer an improved sustainable transport strategy.
- 6.3 Site EOS4.0 has been withdrawn by the promoter and is no longer considered available. Therefore, there is no longer an option to bring these sites together as a strategic site. Sites PCS21 and CFS26 fall into the low to moderate Green Belt harm group of sites and have already been agreed at the 3 August Local Plan Sub-Committee. Options can still be explored for an improved access and transport solution through the sites' promoters working together.

**Table 2: Strategic sites not recommended for consultation**

Site Ref.	Site Name	Dwellings
EOS12.4	Land to the west and south of Maple Cross (low to moderate harm only)	850
EOS4.0/PCS21/CFS6	Land adjacent to Bedmond Road & South of M25, Abbots Langley	514
	<b>Total</b>	<b>1,365</b>

### New sites submitted

- 7.1 As a result of the Regulation 18 Additional Sites for Potential Allocation consultation five new sites were submitted for the Council's consideration, all of which are in the Green Belt in areas of at least moderate-high Green Belt harm. Another site has been submitted as a result of the Council's call for brownfield sites exercise. The SHELAA forms for these sites can be viewed in Appendix 2.
- 7.2 None of the newly submitted Green belt sites are being recommended by officers to be included in the Regulation 18 consultation on lower numbers.

However, officers are recommending the additional brownfield site to be included as we should be prioritising brownfield development within the urban area where possible.

- 7.3 Site NSS18 Catlips Farm is a large site, but there are a number of site constraints that reduce the developable area. The site is being proposed for 300 dwellings which is not considered strategic in scale. It falls within a moderate-high Green Belt harm parcel and is not within any settlement as defined by the Council's settlement hierarchy, as such it is not recommended for consultation by officers.
- 7.4 Site NSS19 Land north of Russel lane Watford is a small portion of a Watford Borough Council Local Plan allocated site that falls within Three Rivers District. No SHELAA form has been prepared for this site as it did not meet the criteria for inclusion in the Plan. However, when the Council undertakes its Green Belt boundary review this small section could be removed from the Green Belt as all of the neighbouring site in Watford Borough has already been removed and the A41 would form a strong defensible boundary. The site falls within an area of low-moderate Green Belt harm.
- 7.5 Site NSS20 Land adjacent to the RES site falls into an area of High harm Green Belt adjacent to strategic site CFS26c. This site is not considered strategic in scale and has poor access and as such is not recommended for consultation by officers.
- 7.6 Site NSS21 Land between Adams House & Five Oaks, London Rd falls within moderate-high Green Belt harm. The site falls on former garden land and is therefore technically brownfield land within the Green Belt. The site is outside the settlement hierarchy and is 'washed over' by Green Belt, so would result in a pocket in the Green Belt were it to be removed. The site is therefore not supported by officers.
- 7.7 Site NSS22 Lonsdale, 19 Hyde Lane, Nash Mills falls outside of the area assessed by the Stage 2 Green Belt Review, however the Review states that land beyond the assessment area would be at least high harm to the Green Belt. The site is not strategic in scale and is therefore not proposed for inclusion in the consultation.
- 7.8 Site NSS23 Chorleywood Telephone Exchange, Shire Lane, is a brownfield site within the urban area of the key centre of Chorleywood as set out in the Council's settlement hierarchy. It was submitted through the Council's brownfield call for sites and is recommended by officers for inclusion in the Regulation 18 consultation on lower housing numbers. The site promoter has put forwards a very high density for the site which would result in 20-25 dwellings. Officers consider circa 15 dwellings to be more appropriate. This would still be maximising the efficiency of a highly sustainable brownfield site.

## Housing Numbers

**Table 3: Sites recommended for Regulation 18 consultation**

Site Ref.	Site Name	Dwellings
CFS26c	West of the Kings Langley Estate (station side)	893
CFS8d	Notley Farm, Abbots Langley	450



OSPF22	Batchworth Golf Course	618
EOS12.2	Land to the west and south of Maple Cross (full site)	1500
EOS7.0	Land to the south of Shepherds Lane and east of M25	550
CFS59	Land on London Road	40
CFS18c	Hill Farm, Stag Lane	38
NSS23	Chorleywood Telephone Exchange	15
	Brownfield sites (agreed 3 August meeting)	973
	Low to moderate harm sites (agreed 3 August meeting)	907
	Commitments (active planning permissions)	1089
	Windfall allowance	390
	<b>Total</b>	<b>7,463</b>

- 8.1 Table 3 above sets out all the sites recommended for consultation in this report together with the totals agreed at the 3 August Local Plan Sub-Committee meeting. 7,463 dwellings over the 18 year plan period equates to 415 dwellings per annum.
- 8.2 It should be noted that these numbers have been reached using a Green Belt constraint lead approach and not necessarily reflective of the District's housing need figure, which is significantly higher at 637 dwellings per annum calculated using the Government's standard method (11,466 dwellings over the 18 year plan period).
- 8.3 The recommendations in this report together with the sites agreed at the 3 August Local Plan Sub-Committee equate to 65% of the standard method housing target.
- 8.4 As the housing total is so far below our standard method target the Council's approach will be closely scrutinised at examination, so the exclusion of any sites will need to be strongly justified.

### Options and Reasons for Recommendations

- 9.1 The sites recommended in this report, together with those agreed at the 3 August Local Plan Sub-Committee contribute to an approach that would result in a moderate level of growth. Through the Regulation 18 consultations in 2021 and 2023 the Council has already consulted on a high growth option based on the standard method housing need. The low growth option would be no Green Belt land being released at all.
- 9.2 Overall the amount of growth without going into the Green belt would be far too low as we would be unable to meet the needs of the District as required by national policy including affordable housing, housing for the elderly and delivering much needed infrastructure, whereas if we were to meet the standard method housing need in full it would result in unacceptable harm to the Green Belt. It is for this reason that officers recommend a moderate growth approach and the sites recommended within this report together with any strategic sites

agreed at the 24 August Local Plan Sub-Committee would contribute to this approach.

- 9.3 Although officers consider this approach to be justified based on the District's constraints, it should be noted that this moderate growth approach may not be considered acceptable by the Inspector at Local Plan examination. A recent example being the Mole Valley Local Plan examination where the Inspector concluded that the Green Belt sites should be retained in the plan despite the council wishing to remove them following the government's consultation on planning reform.

### Policy/Budget Reference and Implications

- 10.1 The recommendations in this report are within the Council's agreed policy and budgets.

### Financial, Legal, Staffing, Equal Opportunities, Environmental, Community Safety, Public Health, Customer Services Centre, Communications & Website, Risk Management and Health & Safety Implications

- 11.1 None specific.

### Risk and Health & Safety Implications

- 12.1 The Council has agreed its risk management strategy which can be found on the website at <http://www.threerivers.gov.uk>. In addition, the risks of the proposals in the report have also been assessed against the Council's duties under Health and Safety legislation relating to employees, visitors and persons affected by our operations. The risk management implications of this report are detailed below.
- 12.2 The subject of this report is covered by the Planning Policy and Conservation service plan. Any risks resulting from this report will be included in the risk register and, if necessary, managed within this plan.

Nature of Risk	Consequence	Suggested Control Measures	Response (tolerate, treat, terminate, transfer)	Risk Rating (combination of likelihood and impact)
Failure/Delay in delivering Local Plan	Increase in speculative planning applications	Local Development Scheme	tolerate	6
Local Plan found 'unsound' at examination	Main modifications may be required which will result in an extended examination and costs and/or the Plan may have to be withdrawn.	Ensure that the Local Plan is evidenced based and justified	tolerate	6

12.3 The above risks are scored using the matrix below. The Council has determined its aversion to risk and is prepared to tolerate risks where the combination of impact and likelihood scores 6 or less.

Very Likely	Low 4	High 8	Very High 12	Very High 16
	Low 3	Medium 6	High 9	Very High 12
	Low 2	Low 4	Medium 6	High 8
	Low 1	Low 2	Low 3	Low 4
Likelihood ↓ Remote	Impact -----> Unacceptable			

**Impact Score**

- 4 (Catastrophic)
- 3 (Critical)
- 2 (Significant)
- 1 (Marginal)

**Likelihood Score**

- 4 (Very Likely (≥80%))
- 3 (Likely (21-79%))
- 2 (Unlikely (6-20%))
- 1 (Remote (≤5%))

12.4 In the officers' opinion none of the new risks above, were they to come about, would seriously prejudice the achievement of the Strategic Plan and are therefore operational risks. The effectiveness of the management of operational risks is reviewed by the Audit Committee annually.

**Recommendation**

13.1 That the Local Plan Sub Committee:

- Note the contents of this report
- Note the contents of the presentation
- Consider the sites as set out in the presentation against the criteria set out in this report and slides.
- Agree the sites in Table 1 together with the newly submitted brownfield site NSS23.
- Recommend to Policy & Resources Committee the sites to be included in the Regulation 18 consultation on lower housing numbers.

Report prepared by: Marko Kalik, Head of Planning Policy and Conservation

## **Appendices**

Appendix 1 – SHELAA forms – recommended sites  
Appendix 2 – SHELAA forms – not recommended sites  
Appendix 3 – Interim SA report (June 2021)  
Appendix 4 – SA Working Note (January 2023)  
Appendix 5 – Statutory consultee response summaries  
Appendix 6 – Summaries of public comments  
Appendix 7 – District map  
Appendix 8 – Abbots Langley and Kings Langley maps  
Appendix 9 – Chorleywood and Mill End maps  
Appendix 10 – Batchworth maps  
Appendix 11 – Maple Cross maps

## **Background Papers**

National Planning Policy Framework (2021)  
Planning Practice Guidance  
Core Strategy (2011)  
Green Belt Review Strategic Analysis (Stage 1) (2017)  
Stage 2 Green Belt Assessment (2019)  
Regulation 18 Part 1: Preferred Policy Options (2021)  
Regulation 18 Part 2: Sites for Potential Allocation (2021)  
Regulation 18 Part 3: Additional Sites for Potential Allocation (2023)  
Potential Sites consultation (2018)  
Regulation 18 Issues & Options consultation (2017)  
Levelling-up and Regeneration Bill: reforms to national planning policy (2022)  
Strategic Housing & Employment Land Availability Assessment (2020)  
Strategic Housing & Employment Land Availability Assessment Addendum (2023)  
Urban Capacity Study (2020)  
13 June 2023 Local Plan Sub-Committee  
10 July 2023 Local Plan Sub-Committee Briefing Note  
3 August Local Plan Sub-Committee



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## Appendix 1 – Sites Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
CFS26c	West of the Kings Langley Estate	Abbots Langley	25.5
<b>Site Description</b>			
<p>The site consists of open greenfield land which is in agricultural use. The site's western boundary is formed by a railway line whilst the southern boundary is formed by Egg Farm Lane. There is a wind turbine located to the immediate south. Further to the west, and adjacent to the north of the site, is residential development. Agricultural land is located to east.</p>			
<b>Use(s) Proposed</b>		Residential	
<b>Planning History</b>			
There is no relevant planning history on the site.			
<b>Suitability</b>			
<b>Policy Constraints:</b>		<ul style="list-style-type: none"> <li>• <b>Green Belt:</b> The site is located in the Green Belt. The Stage 2 Green Belt Review assessed harm to the Green Belt of releasing the wider parcel (in which the site is located) as high.</li> <li>• <b>Historic Environment:</b> There are also several Locally Listed Buildings at the south-western corner and in the centre of the site, associated with Numbers Farm and Ovaltine Egg Farm. Any future proposals should take this into account.</li> </ul>	
<b>Physical Constraints:</b>		<ul style="list-style-type: none"> <li>• <b>Flood Zone:</b> The site is in Flood Zone 1.</li> <li>• <b>Surface Water Flood Risk:</b> There is a surface water flow path, ranging from low to medium risk, running through the north of the site, which ponds at the north-west of the site. Another surface water flow path ranging from low-medium risk runs through the south of the site and ponds in the central-southern area.</li> <li>• <b>Groundwater Source Protection Zone :</b> Site is within or close to GSPZ1</li> <li>• Affinity Water state there is significant mains apparatus within the site</li> <li>• <b>Access:</b> Access exists from Egg Farm Lane although this is a narrow road and improvements would likely be required. Potential vehicular access is proposed from Toms Lane.</li> </ul>	

## Appendix 1 – Sites Recommended for Consultation

	<ul style="list-style-type: none"> <li>• <b>Noise:</b> Noise issues caused by the site's proximity to the M25 and the railway line may have an impact on the site and its future occupiers.</li> </ul>		
<b>Potential Environmental Impacts:</b> <ul style="list-style-type: none"> <li>• Landscape Character</li> <li>• Air Quality (AQMA)</li> <li>• Local Wildlife Site</li> <li>• Local Nature Reserve</li> <li>• SSSI</li> <li>• Ancient Woodland</li> <li>• Tree Preservation Order</li> <li>• Ancient/Veteran Tree</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Local Wildlife Site:</b> There is a Local Wildlife Site (Numbers Farm Area) located in the central-northern area of the site.</li> <li>• <b>TPO:</b> There are protected trees to the south and east of the site as well as in the central-northern area of the site (TPO317).</li> <li>• <b>Chiltern Beechwoods SAC:</b> The site is within the Zone of Influence, further consultation with Natural England would be needed to determine the recreational impacts and any requirement for mitigation measures</li> </ul>		
<b>Further Constraints/Considerations:</b>			
<ul style="list-style-type: none"> <li>• A public right of way runs along part of the eastern and southern boundaries as well as through the site to the south-east and south-west.</li> <li>• <i>Settlement Hierarchy (Core Strategy, 2011):</i> The site is located at the edge of the Secondary Centre of Kings Langley.</li> <li>• Highways England state the site has a boundary with or close to the SRN; there will be an added level of requirements for Highways England which are likely to include issues regarding ground conditions, drainage, lighting, noise and vibration, in addition to cumulative traffic impacts.</li> </ul>			
<b>Availability (ownership/legal issues)</b>			
The site is in single ownership and the site is being promoted by the landowner as part of a larger site (Site CFS26b).			
<b>Achievability</b>			
The promoters of the site have not specified any issues regarding the viability in developing the site.			
<b>Potential Density</b>			
Landowner Proposed DPH	N/A	Landowner Proposed Dwelling Range	N/A
Indicative DPH	30-40	Indicative Dwelling Range	765-1020
<b>Phasing</b>			
0-5 years		6-10 years	x
		11-15 years	x
		16+ years	
<b>Conclusion</b>			
<p>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 high. The site is adjacent to the settlement of Kings Langley and it is considered that infrastructure provision and walking/cycling routes that would be required from a development of this scale would ensure integration with the adjacent settlement. The site is strategic in scale and its development would support a high level of infrastructure provision. It is considered that the strategic advantages of the site justify the high harm to the Green Belt in releasing the site.</p> <p>The site is therefore deemed suitable. Areas of the site are at risk of surface water flooding and future proposals would need to satisfactorily address this and provide suitable mitigation where necessary. Any proposals should take account of the presence of the Local Wildlife Site, protected trees and public rights of way within the site. Any potential impacts on heritage assets and noise and air quality issues arising from proximity to the M25 should also be taken account of. The site is both available and achievable. The site is deemed to be developable.</p>			
<b>Suitable</b>	Yes	<b>Available</b>	Yes
<b>Achievable</b>	Yes	<b>Suitable</b>	Yes



## Appendix 1 – Sites Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
OSPF22	Batchworth Park Golf Course	Rickmansworth	55.3
<b>Site Description</b>			
<p>The site is mostly comprised of greenfield land, in use as Batchworth Park Golf Course, with a small area of previously developed land to the west of the site, associated with the Club House and car park. There is also a residential dwelling and garden within the site (Batchworth Hill House) located to the east of the site and to the front of the Batchworth Park Golf Club car park. There are ponds located to the south, north-west and at the centre of the site and there are areas of woodland along the southern and northern boundaries (Sandfield Spring and The Grove). The site's northern boundary is adjacent to residential development associated with Rickmansworth, whilst the eastern boundary is adjacent to London Road and residential dwellings in part. There is an unused field located within the site boundary, but separated from the Golf Course; this is located to the east of the site, adjacent to London Road (Site CFS59). To the south of the site is agricultural land and to the south-east is Nine of Herts Golf Course.</p>			
<b>Use(s) Proposed</b>		Care Home / Residential	
<b>Planning History</b>			
There is no relevant planning history on the site.			
<b>Suitability</b>			
<b>Policy Constraints:</b> <ul style="list-style-type: none"> <li>Green Belt</li> <li>Heritage Assets Listed Buildings</li> <li>Conservation Area</li> <li>Historic Park and Garden</li> <li>AONB</li> </ul>		<ul style="list-style-type: none"> <li><b>Green Belt:</b> The site is located in the Green Belt. The site falls into three parcels assessed in the Stage 2 Green Belt Review. Release of the parcel (in which the majority of the site is located, to the north) was assessed as leading to high harm to the Green Belt. Areas of the site to the east, along London Road (Site CFS59 and the area of the clubhouse, car park and Batchworth Hill House), were assessed as leading to moderate-high harm to the Green Belt if released. The remainder of the site, to the south and along the western boundary, were not assessed in the Stage 2 Green Belt Review; the Stage 2 Green Belt Review states that the release of any land outside the assessment area would result in at least high harm to the Green Belt.</li> <li><b>Historic Environment:</b> Moor Park Registered Park and Garden is located to the east of the site, on the opposite side of London Road. There is a Grade II Listed Building adjacent to the south-</li> </ul>	

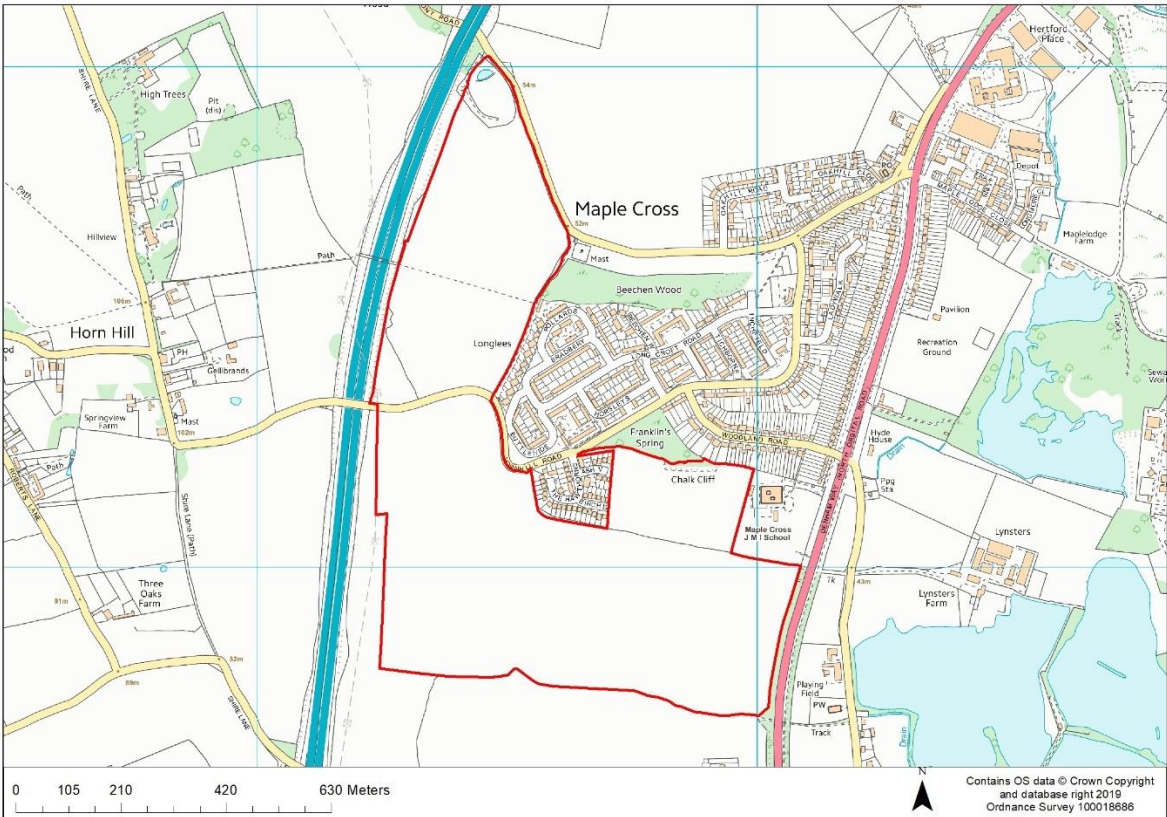
## Appendix 1 – Sites Recommended for Consultation

	<p>eastern corner of the site (Milestone about 35m west of no. 1 Home Farm Road). The Heritage Impact Assessment states that development would have a minor adverse impact on the historic environment. Any application would need to be accompanied by a heritage impact statement and there should be early discussions with the conservation officer on layout and height of development.</p>
<p><b>Physical Constraints:</b></p> <ul style="list-style-type: none"> <li>• Access</li> <li>• Flood Zone</li> <li>• Surface Water Flooding</li> <li>• Groundwater Flooding</li> <li>• Groundwater Source Protection Zone (GSPZ)</li> <li>• Contamination</li> <li>• Noise</li> <li>• Air Quality</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Flood Zone:</b> The site is in Flood Zone 1.</li> <li>• <b>Surface Water Flood Risk:</b> There is low risk of surface water flooding along the southern boundary as well as scattered throughout the site, associated with the ponds located within the site.</li> <li>• <b>GSPZ:</b> Part of the site, to the north, is in GSPZ1, which is the most sensitive zone in terms of the potential risk of contamination to the groundwater source. A site in GSPZ1 can significantly constrain the density, scale and design of development; the Environment Agency have stated they would be likely to object in principle to tall buildings with deep foundations, infiltration drainage measures such as soakaways and underground car parks in GSPZ1. A preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site.</li> <li>• <b>Access:</b> The site has an existing access from London Road.</li> <li>• <b>Contamination:</b> There is an area of historic landfill located to the north-west of the site (Juniper Hill, Site Ref: EAHL12364).</li> <li>• <b>Noise:</b> Is the site is located within a source of noise? – motorways, railway lines</li> </ul>
<p><b>Potential Environmental Impacts:</b></p> <ul style="list-style-type: none"> <li>• Landscape Character</li> <li>• Air Quality (AQMA)</li> <li>• Local Wildlife Site</li> <li>• Local Nature Reserve</li> <li>• SSSI</li> <li>• Ancient Woodland</li> <li>• Tree Preservation Order</li> <li>• Ancient/Veteran Tree</li> </ul>	<ul style="list-style-type: none"> <li>• <b>TPO:</b> There are protected trees to the north of the site associated with The Grove woodland (TPO007). There are also protected trees adjacent to the north-western boundary (TPO394).</li> </ul>
<p><b>Further Constraints/Considerations:</b></p>	
<ul style="list-style-type: none"> <li>• A public right of way runs along the north-western boundary.</li> <li>• The Playing Pitch Strategy &amp; Action Plan (2019) recommends that Batchworth Park Golf Course should be retained and its quality sustained through appropriate maintenance.</li> <li>• <i>Settlement Hierarchy (Core Strategy, 2011):</i> The north of site is located at the edge of the Principal Town of Rickmansworth. The east of the site is at the edge of the Batchworth Park settlement which is classified as an “other settlement” in the Settlement Hierarchy.</li> </ul>	
<p><b>Availability (ownership/legal issues)</b></p>	
<p>The site is in four separate ownerships. The promoter of the site owns the majority of the site. The second landowner has promoted the land in their ownership separately (Site CFS59). Three Rivers District Council owns a proportion of the site (Sandlefield Spring and The Grove) and is not promoting these areas for development. The part of the site containing Batchworth Hill House is in a separate ownership to that of the promoter and this part of the site not been promoted by its landowner.</p>	
<p><b>Achievability</b></p>	
<p>The promoters of the site have not specified any issues regarding the viability in developing the site.</p>	

## Appendix 1 – Sites Recommended for Consultation

Potential Density							
Landowner Proposed DPH		N/A		Landowner Proposed Dwelling Range		N/A	
Indicative DPH		11.2		Indicative Dwelling Range		618	
Phasing							
0-5 years		6-10 years	x	11-15 years	x	16+ years	
Conclusion							
<p>The PPS Strategy &amp; Action Plan, forming part of the Open Space, Sport and Recreation Study (2019), states that the current supply of golf facilities in Three Rivers can meet current and future demand; Batchworth Park Golf Course forms part of this supply. The Strategy and Action Plan recommends that Batchworth Park Golf Course should be retained and its quality sustained through appropriate maintenance. The draft Local Plan also seeks to protect existing sport and recreation facilities (including golf courses/facilities). It is therefore considered that the site's current use should be protected.</p> <p>The remainder of the site, which is not comprised of the golf course, is located is assessed as leading to moderate-high harm. The first area resulting in moderate-high harm consists of an area of greenfield land; please see the Site Assessment for Site CFS59 which has been promoted separately. The second area resulting in moderate-high harm is comprised of the club-house and car park as well as a residential dwelling (Batchworth Hill House); this area is considered to be undeliverable. The club-house and car park is ancillary to Batchworth Park Golf Course and is considered to be unsuitable as this use should be protected (as set out above). The area containing the residential dwelling has not been promoted for development and is considered to be unavailable. The area containing the residential dwelling is also washed over by the Green Belt and is not located at the edge of a higher tier settlement or inset village and subsequently is considered to be unsuitable.</p>							
<b>Suitable</b>	No	<b>Available</b>	Partially Y	<b>Achievable</b>	Yes		

## Appendix 1 – Sites Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
EOS12.2	Land to the west and south of Maple Cross	Maple Cross	52.2
			
<b>Site Description</b>			
<p>The site is comprised of greenfield land, which is in use as open, agricultural land. The east of the site is bounded by trees and residential development associated with Maple Cross. The western boundary is in close proximity to the M25, with an area of greenspace abutting the western boundary and the M25 towards the south-west of the site. The northern boundary of the site runs along Chalfont Lane, with the north-eastern boundary abutting Franklin's Spring. To the immediate north-east of the site is Maple Cross JMI School and to the east is Denham Way, beyond a strip of trees. Hornhill Road runs directly through the site separating the site into two parcels of land (northern and southern parcels). The site is a combination of Site CFS34b and EOS12.0</p>			
<b>Use(s) Proposed</b>	Residential, education, community uses, retail, business		
<b>Planning History</b>			
There is no relevant planning history on the site.			
<b>Suitability</b>			
<b>Policy Constraints:</b>		<ul style="list-style-type: none"> <li>• <b>Green Belt:</b> The site is located in the Green Belt. The site is located in four parcels which were assessed in the Stage 2 Green Belt Review. Harm to the Green Belt of releasing the wider parcel (in which the northern part of the site is located) was assessed as high. Harm to the Green Belt of releasing the parcel (in which the central part of the site is located, i.e. the land adjacent to north and south of Hornhill Road) was assessed as moderate. Harm to the Green Belt of releasing the parcel (in which the southern part of the site is located) was assessed as moderate-high. Harm to the Green Belt of releasing the parcel (in which the north-eastern parcel of the site, adjacent to Franklin's Spring, is located) was assessed as low-moderate.</li> <li>• <b>Historic Environment:</b> A Grade II Listed Building (The Church of St Thomas of Canterbury) lies to the immediate east of the site. The Heritage Impact Assessment states that development</li> </ul>	
<ul style="list-style-type: none"> <li>• Green Belt</li> <li>• Heritage Assets Listed Buildings</li> <li>• Conservation Area</li> <li>• Historic Park and Garden</li> <li>• AONB</li> </ul>			

## Appendix 1 – Sites Recommended for Consultation

	<p>of the whole land parcel would have a minor adverse impact on the historic environment, as there would be a change in the agrarian landscape by development. The Heritage Impact Assessment states that careful design has the potential to limit the harm, especially at the eastern side of the development. Any application would need to be accompanied by a heritage impact statement and there should be early discussions with the conservation officer on layout and height of development.</p> <ul style="list-style-type: none"> <li>• <b>Archaeology:</b> HCC Historic Environment advise that the site includes/has potential to include heritage assets of archaeological interest; any development proposals on the site should be accompanied by a pre-application or pre-determination archaeological assessment.</li> </ul>
<p><b>Physical Constraints:</b></p> <ul style="list-style-type: none"> <li>• Access</li> <li>• Flood Zone</li> <li>• Surface Water Flooding</li> <li>• Groundwater Flooding</li> <li>• Groundwater Source Protection Zone (GSPZ)</li> <li>• Contamination</li> <li>• Noise</li> <li>• Air Quality</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Flood Zone:</b> The site is in Flood Zone 1.</li> <li>• <b>Surface Water Flood Risk:</b> Within the southern part of the site, there is a surface water flow path running from the central eastern boundary (adjacent to Denham Way) towards the central-southern area of the site. This flow path is at low risk of surface water flooding (1 in 1000 year rainfall event). Against the eastern boundary and to the north-east of the site, there are small areas at high risk (1 in 30 year rainfall event). Close to the northern boundary, adjacent to Franklin's Spring, there is small area which ranges from medium-low risk of surface water flooding. The north-eastern boundary of the northern parcel is at low risk of surface water flooding along the north-eastern boundary.</li> <li>• <b>Groundwater Flood Risk:</b> The northern part of the northern parcel of the site has groundwater levels ranging from 0.5m and 5m. The centre of the site, adjacent to Hornhill Road and the south-western part of the southern parcel has groundwater levels at least 5m below the ground surface. The eastern and central areas of the southern parcel has groundwater levels between 0.5m and 5m of the surface. The south-eastern area of the southern parcel has groundwater levels between 0.025m and 0.5m below the ground surface.</li> <li>• <b>GSPZ:</b> The majority of the site is in GSPZ1, which is the most sensitive zone in terms of potential risk of contamination to the groundwater source. A site in GSPZ1 can significantly constrain the density, scale and design of development; the Environment Agency have stated they would be likely to object in principle to tall buildings with deep foundations, infiltration drainage measures such as soakaways and underground car parks in GSPZ1. A preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site. A small area at the north-eastern corner of the site is in GSPZ2.</li> <li>• <b>Access:</b> There is no existing access into the site. It is proposed that the site would be accessed from Denham Way, as the primary route leading to the northern part of the site. A secondary access could be provided from Hornhill Road and an emergency access is also proposed from the north of the northern parcel.</li> <li>• <b>Noise:</b> Noise issues caused by the site's proximity to the M25 may have an impact on the site and its future occupiers.</li> <li>• <b>Air Quality:</b> Air quality issues caused by the site's proximity to the M25 may have an impact on the site and its future occupiers.</li> </ul>

## Appendix 1 – Sites Recommended for Consultation

	<ul style="list-style-type: none"> <li>• <b>Wastewater:</b> Thames Water have advised that the scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development.</li> </ul>						
<b>Potential Environmental Impacts:</b> <ul style="list-style-type: none"> <li>• Landscape Character</li> <li>• Air Quality (AQMA)</li> <li>• Local Wildlife Site</li> <li>• Local Nature Reserve</li> <li>• SSSI</li> <li>• Ancient Woodland</li> <li>• Tree Preservation Order</li> <li>• Ancient/Veteran Tree</li> </ul>	<ul style="list-style-type: none"> <li>• The northern parcel of land was not assessed as part of the Landscape Sensitivity Assessment. The southern part of land was assessed; Landscape Sensitivity Assessment classifies the southern section of the site (CFS34a) as having medium-high sensitivity to built development. The northern section (CFS34) is classified as having medium-low sensitivity to built development.</li> <li>• <b>TPO:</b> There are protected trees within the site, adjacent to the north of Hornhill Road (TPO044).</li> </ul>						
<b>Further Constraints/Considerations:</b>							
<ul style="list-style-type: none"> <li>• The southern parcel of land has a public right of way which runs along the northern boundary and through the site. The northern parcel of land has two public rights of ways, one of which runs through the centre of the site (Rickmansworth 009) and the other along the eastern boundary (Rickmansworth 008).</li> <li>• The HS2 safeguarding zone is adjacent to the western boundary of the southern parcel of land.</li> <li>• The site is strategic in scale and would provide supporting infrastructure. This includes: a primary education extension to Maple Cross JMI and Nursery School, parkland (including play space), a local centre including local shops, community facilities, a nursery and flexible commercial space, a 90-bed extra care home, improved bus stops and an extended bus route through the site as well as pedestrian and cycle routes.</li> <li>• Settlement Hierarchy (Core Strategy, 2011): The site is located at the edge of the Secondary Centre of Maple Cross.</li> </ul>							
<b>Availability (ownership/legal issues)</b>							
The site is in single ownership and the site is being promoted by the landowner.							
<b>Achievability</b>							
The promoters of the site have not specified any issues regarding the viability in developing the site.							
<b>Potential Density</b>							
Landowner Proposed DPH	29		Landowner Proposed Dwelling Range		1500		
Indicative DPH	29		Indicative Dwelling Range		1500		
<b>Phasing</b>							
0-5 years	x	6-10 years	x	11-15 years	x	16+ years	
<b>Conclusion</b>							
<p>The site is located in the Green Belt. Harm to the Green Belt of releasing the four parcels (in which the site is located) were assessed as ranging from low-moderate, moderate, moderate-high and high across the site. The site is strategic in scale and its development would support a high level of infrastructure provision. It is considered that the strategic advantages of the site justify the level of high harm to the Green Belt in releasing the northern part of the site parcels of the site as well as the release of areas within the site that would result in lower harm to the Green Belt.</p> <p>The site is therefore deemed to be suitable. Small areas of the site are at risk of surface water and groundwater flooding and future proposals would need to satisfactorily address this and provide suitable mitigation where necessary. Consideration to heritage assets and potential environmental impacts will also need to be made. Future proposals would also need to take account of the site's location in GSPZ1. Any development would need to take account of the presence of Public Rights of Way and the presence of protected trees on site. The site is both available and achievable. The site is considered to be developable.</p>							
<b>Suitable</b>	Yes		<b>Available</b>	Yes		<b>Achievable</b>	Yes

## Appendix 1 – Sites Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
EOS7.0	Land to the south of Shepherds Lane and west of the M25	Mill End	20.8
<p><b>Site Description</b></p> <p>The site is comprised of greenfield land and is in agricultural use. There is a small area of woodland to the south-western corner, with tree-lined boundaries to the south, west and east. The western boundary is adjacent to the M25 whilst the southern boundary is formed by Long Lane. Beyond the southern boundary, on the opposite side of Long Lane, is safeguarded land for education use and the Reach Free School (Allocation Site S(a)). The northern boundary is formed by Shepherds Lane. King George V Playing Fields are adjacent to the north-eastern corner of the site. William Penn Leisure Centre is located to the north-east.</p> <p>The site contains Site CFS37 and Site PSCFS21 in its boundary.</p>			
<b>Use(s) Proposed</b>		Residential	
<b>Planning History</b>			
There is no relevant planning history on the site.			
<b>Suitability</b>			
<p><b>Policy Constraints:</b></p> <ul style="list-style-type: none"> <li>Green Belt</li> <li>Heritage Assets Listed Buildings</li> <li>Conservation Area</li> <li>Historic Park and Garden</li> <li>AONB</li> </ul>		<ul style="list-style-type: none"> <li><b>Green Belt:</b> The site is located in the Green Belt. 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.</li> <li><b>Historic Environment:</b> There are no Heritage Assets within the site. Heronsgate Conservation Area is located to the south-west, although this is located on the opposite side of the M25. A detailed heritage impact assessment may be required as part of any proposals. The Heritage Impact Assessment states that the site's development would have a neutral impact on the historic environment.</li> <li><b>Archaeology:</b> HCC Historic Environment advise that the site includes/has potential to include heritage assets of archaeological interest; any development proposals on the site should be accompanied by a pre-application or pre-determination archaeological assessment.</li> </ul>	

## Appendix 1 – Sites Recommended for Consultation

<b>Physical Constraints:</b> <ul style="list-style-type: none"> <li>• Access</li> <li>• Flood Zone</li> <li>• Surface Water Flooding</li> <li>• Groundwater Flooding</li> <li>• Groundwater Source Protection Zone (GSPZ)</li> <li>• Contamination</li> <li>• Noise</li> <li>• Air Quality</li> </ul>		<ul style="list-style-type: none"> <li>• <b>Flood Zone:</b> The site is within Flood Zone 1.</li> <li>• <b>Surface Water Flood Risk:</b> There is low risk of surface water flooding along the southern, northern and north-eastern boundaries.</li> <li>• <b>GSPZ:</b> The site is in GSPZ1, which is the most sensitive zone in terms of the potential risk of contamination to the groundwater source. A site in GSPZ1 can significantly constrain the density, scale and design of development. A preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site.</li> <li>• <b>Access:</b> There is no vehicular access onto the site. Long Lane, which is adjacent to the south of the site, meets the south-western corner of the site; this is a single-track road and there would likely be capacity issues in using this as the primary access road into the site. Access could be provided from Shepherds Lane. HCC Highways have stated that access is likely to be technically achievable and that a wider settlement strategy could address sustainability concerns that HCC Highways have.</li> <li>• <b>Noise:</b> Noise issues caused by the site's proximity to the M25 may have an impact on the site and its future occupiers.</li> <li>• <b>Air Quality:</b> Air quality issues caused by the site's proximity to the M25 may have an impact on the site and its future occupiers.</li> </ul>	
<b>Potential Environmental Impacts:</b> <ul style="list-style-type: none"> <li>• Landscape Character</li> <li>• Air Quality (AQMA)</li> <li>• Local Wildlife Site</li> <li>• Local Nature Reserve</li> <li>• SSSI</li> <li>• Ancient Woodland</li> <li>• Tree Preservation Order</li> <li>• Ancient/Veteran Tree</li> </ul>		<ul style="list-style-type: none"> <li>• The Landscape Sensitivity Assessment assessed the site as having medium-high sensitivity to built development.</li> <li>• <b>Tree Preservation Order:</b> There are protected trees at the south-west corner (TPO048) and to the north-western corner of the site (TPO069).</li> <li>• <b>Ecology:</b> HCC Ecology have stated that whilst there are no fundamental ecological constraints on the site, the site provides an arable habitat so biodiversity offsetting would be expected.</li> </ul>	
<b>Further Constraints/Considerations:</b> <ul style="list-style-type: none"> <li>• A public right of way (Rickmansworth 021) runs along the western boundary to the north of the site.</li> <li>• Settlement Hierarchy (Core Strategy, 2011): The site is located at the edge of the Key Centre of Mill End.</li> </ul>			
<b>Availability (ownership/legal issues)</b>			
<p>The site is in multiple ownerships. Site CFS37 and PSCFS21 have been promoted for development within the site. The remainder of the site is owned by Three Rivers District Council and is being promoted for development.</p>			
<b>Achievability</b>			
<p>No viability issues have been identified.</p>			
<b>Potential Density</b>			
Landowner Proposed DPH	N/A	Landowner Proposed Dwelling Range	N/A
Indicative DPH	30-43	Indicative Dwelling Range	625-895
<b>Phasing</b>			
0-5 years		6-10 years	x
		11-15 years	x
		16+ years	
<b>Conclusion</b>			
<p>The site is deemed suitable for residential development subject to appropriate mitigation measures as necessary. Any development of the site should take account of the presence of public rights of way and protected trees within the site. Consideration should also be given to the site's location in GSPZ1. Noise and air quality issues arising from proximity to the M25 should also be taken account of. The site is both available and achievable.</p>			
<b>Suitable</b>	Yes	<b>Available</b>	Yes
<b>Achievable</b>	Yes	<b>Achievable</b>	Yes



## Appendix 1 – Sites Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
CFS59	Land on London Road	Rickmansworth	1.1
<b>Site Description</b>			
<p>The site is greenfield land and is currently unused open land. Adjacent to the western boundary of the site is Batchworth Park Golf Course, whilst to the north and south there are residential plots associated with properties on London Road. The eastern boundary is formed by London Road, with low-density residential development and Rickmansworth Golf Course beyond this.</p>			
<b>Use(s) Proposed</b>		Residential Care Home (C2)	
<b>Planning History</b>			
There is no relevant planning history on the site.			
<b>Suitability</b>			
<b>Policy Constraints:</b> <ul style="list-style-type: none"> <li>Green Belt</li> <li>Heritage Assets Listed Buildings</li> <li>Conservation Area</li> <li>Historic Park and Garden</li> <li>AONB</li> </ul>		<ul style="list-style-type: none"> <li><b>Green Belt:</b> The site is located in the Green Belt. 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.</li> <li><b>Historic Environment:</b> Moor Park Registered Park and Garden is located to the east of the site, on the opposite side of London Road. The Heritage Impact Assessment states that the site's development would have a neutral impact on the historic environment.</li> </ul>	
<b>Physical Constraints:</b> <ul style="list-style-type: none"> <li>Access</li> <li>Flood Zone</li> <li>Surface Water Flooding</li> <li>Groundwater Flooding</li> <li>Groundwater Source Protection Zone (GSPZ)</li> <li>Contamination</li> <li>Noise</li> <li>Air Quality</li> </ul>		<ul style="list-style-type: none"> <li><b>Flood Zone:</b> The site is in Flood Zone 1.</li> <li><b>GSPZ:</b> The northern section of the site is in GSPZ1, which is the most sensitive zone in terms of the potential risk of contamination to the groundwater source. A site in GSPZ1 can significantly constrain the density, scale and design of development; the Environment Agency have stated they would be likely to object in principle to tall buildings with deep foundations, infiltration drainage measures such as soakaways and underground car parks in GSPZ1. A preliminary risk assessment to determine whether there is contamination of the site, and whether remediation works would be needed, would be required at the pre-application stage to support any proposals on the site.</li> </ul>	

## Appendix 1 – Sites Recommended for Consultation

		<ul style="list-style-type: none"> <li>• <b>Access:</b> The site could be accessed from London Road.</li> </ul>	
<b>Potential Environmental Impacts:</b> <ul style="list-style-type: none"> <li>• Landscape Character</li> <li>• Air Quality (AQMA)</li> <li>• Local Wildlife Site</li> <li>• Local Nature Reserve</li> <li>• SSSI</li> <li>• Ancient Woodland</li> <li>• Tree Preservation Order</li> <li>• Ancient/Veteran Tree</li> </ul>		<ul style="list-style-type: none"> <li>• The <b>Landscape Sensitivity Assessment</b> classifies the site as having a medium-low sensitivity to built development.</li> </ul>	
<b>Further Constraints/Considerations:</b>			
<ul style="list-style-type: none"> <li>• HCC Highways state that the site presents significant concerns that Local Transport Policy could be met due to the site's location.</li> <li>• Settlement Hierarchy (Core Strategy, 2011): The site is located in Batchworth Park which is classified as an "Other Settlement" in the Settlement Hierarchy. The site is in close proximity (less than 100m) to the boundary of the Principal Town of Rickmansworth.</li> </ul>			
<b>Availability (ownership/legal issues)</b>			
The site is in single ownership and the site is being promoted by the landowner.			
<b>Achievability</b>			
The promoters of the site have not specified any issues regarding the viability in developing the site.			
<b>Potential Density</b>			
Landowner Proposed DPH	63 Bedrooms Per Hectare Equivalent to 34 DPH	Landowner Proposed Dwelling Range	70 bedrooms Equivalent to 37 dwellings (1.9:1 ratio of bedroom: dwelling)
Indicative DPH	63-72 Bedrooms Per Hectare Equivalent to 34-38 DPH	Indicative Dwelling Range	70-80 bedrooms Equivalent to 37-42 dwellings (1.9:1 ratio of bedroom: dwelling)
<b>Phasing</b>			
0-5 years	x	6-10 years	x
		11-15 years	
			16+ years
<b>Conclusion</b>			
C2 housing is considered to be specialised and supported accommodation under the Draft Housing Mix policy. The provision of specialised and supported housing is a strategic objective of the Local Plan which the site would contribute to achieving. The site is considered to be suitable for a residential care home (C2). Future proposals should take account of the site's partial location in GSPZ1. The site is both available and achievable.			
<b>Suitable</b>	Yes	<b>Available</b>	Yes
		<b>Achievable</b>	Yes

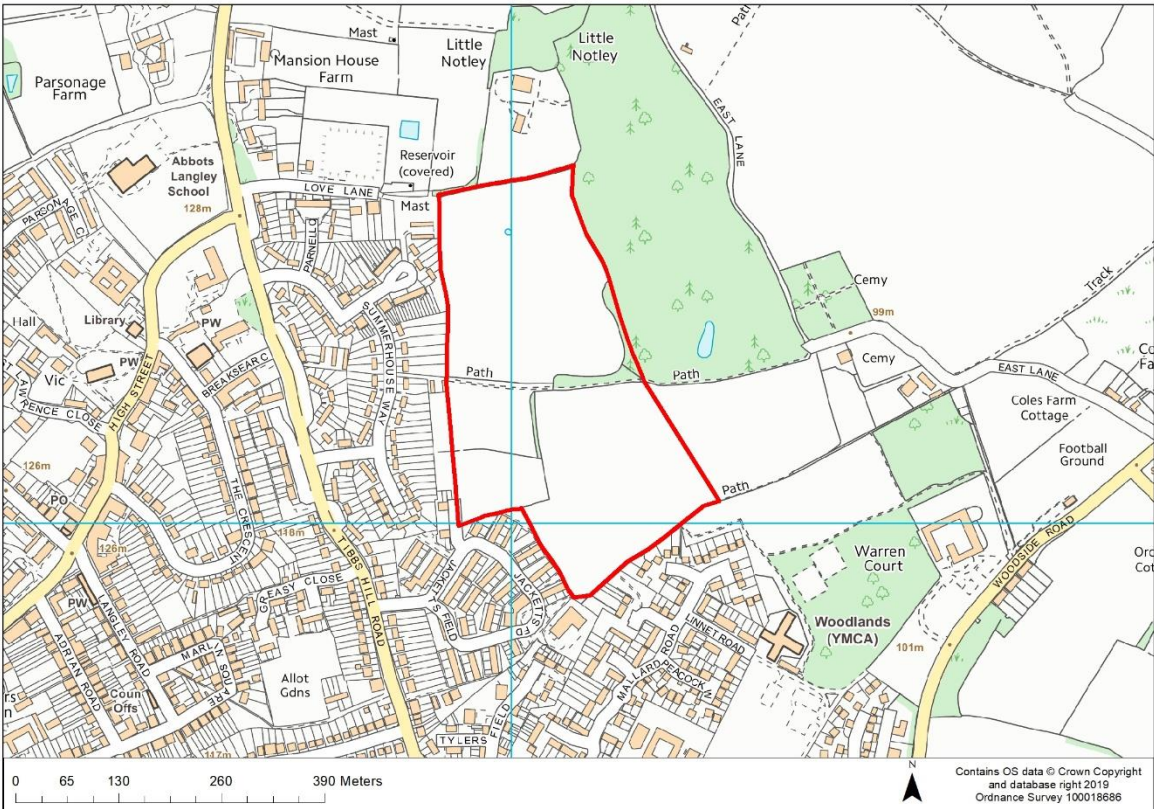
## Appendix 1 – Sites Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
CFS18c	Hill Farm, Stag Lane	Chorleywood	0.75
<b>Site Description</b>			
<p>The site is comprised mainly of agricultural buildings, with a small area of trees to the west of the site. To the north of the site is a primary school and residential development of Chorleywood. To the east there is low-density residential development along Stag Lane. There is open agricultural land to the south and east.</p> <p>The site is a revised boundary of a larger site which is included in the SHELAA (Site CFS18).</p>			
<b>Use(s) Proposed</b>		Residential	
<b>Planning History</b>			
<p>There have been three prior approval applications on land at the north of the site. The application for change of use of an agricultural barn to one dwelling was refused (15/0463/PDA) and a later application for the change of use of an agricultural barn to a pair of semi-detached dwellings was refused (15/0643/PDA). An application for the change of use of an agricultural barn to three dwellings was also refused (16/1361/PDA).</p>			
<b>Suitability</b>			
<b>Policy Constraints:</b>		<ul style="list-style-type: none"> <li>• <b>Green Belt:</b> The site is located in the Green Belt. The site is within parcel CH4, assessed in the Stage 2 Green Belt Review. The parcel in which the site is located was assessed as leading to low harm to the Green Belt if released.</li> <li>• <b>Historic Environment:</b> The site is not within or adjacent to a Conservation Area, and there are no other Heritage Assets in the immediate vicinity of the site</li> <li>• <b>Archaeology:</b> HCC Historic Environment advise that the site includes/has potential to include heritage assets of archaeological interest; any development proposals on the site should be accompanied by a pre-application or pre-determination archaeological assessment.</li> </ul>	
<b>Physical Constraints:</b>		<ul style="list-style-type: none"> <li>• <b>Flood Zone:</b> The site is in Flood Zone 1.</li> <li>• <b>Source Protection Zone:</b> Part of the site is in SPZ1, and the rest of the site is adjacent to SPZ1. Environment Agency guidance will need to be taken into consideration if the site is to be developed</li> <li>• <b>Access:</b> The site is accessed from Stag Lane, although this is a narrow road with capacity for single-file traffic for most of its length and improvements would be necessary. Access on to</li> </ul>	
<ul style="list-style-type: none"> <li>• Green Belt</li> <li>• Heritage Assets Listed Buildings</li> <li>• Conservation Area</li> <li>• Historic Park and Garden</li> <li>• AONB</li> </ul>			
<ul style="list-style-type: none"> <li>• Access</li> <li>• Flood Zone</li> <li>• Surface Water Flooding</li> <li>• Groundwater Flooding</li> <li>• Groundwater Source Protection Zone (GSPZ)</li> <li>• Contamination</li> </ul>			

## Appendix 1 – Sites Recommended for Consultation

<ul style="list-style-type: none"> <li>Noise</li> <li>Air Quality</li> </ul>	<p>Stag Lane is proposed to utilise the permitted site access with minor amendments. It is proposed by the promoter to make further amendments to the Stag Lane access to provide a full-length access of 4.8m within the site, and an improved visibility to the west and a footway of 2.0m in width on the southern side of Stag Lane in the vicinity of the junction only.</p>							
<p><b>Potential Environmental Impacts:</b></p> <ul style="list-style-type: none"> <li>Landscape Character</li> <li>Air Quality (AQMA)</li> <li>Local Wildlife Site</li> <li>Local Nature Reserve</li> <li>SSSI</li> <li>Ancient Woodland</li> <li>Tree Preservation Order</li> <li>Ancient/Veteran Tree</li> </ul>	<ul style="list-style-type: none"> <li>The Landscape Sensitivity Assessment classifies the site as having a medium sensitivity to built development.</li> <li>The site is within the Chilterns Landscape Area</li> <li><b>Local Wildlife Site:</b> There is a Local Wildlife Site (Shepherd's Lane Wood) a short distance from the south-eastern boundary.</li> <li><b>TPO:</b> There are no protected trees within the site, however there are some trees along stag lane opposite the site which are protected under TPO080.</li> <li><b>Wastewater:</b> Thames Water have advised that the scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development.</li> </ul>							
<p><b>Further Constraints/Considerations:</b></p>								
<ul style="list-style-type: none"> <li>There is a public right of way running through the site along the eastern side.</li> <li>Thames Water have advised that the site would be likely to require upgrades to the wastewater network.</li> <li>HCC Highways have stated that enabling the location to be sustainable is considered likely to be achievable, but poor design could result in a car dependent site and wider mitigation measures may be necessary to achieve a sustainable location. Enabling permeability to the existing settlement would be a key consideration.</li> <li>HCC Growth and Infrastructure have stated that this site is not large enough to facilitate bus service improvements for an adequate period or generate patronage that would make any such improvements viable in the long term, and that the surrounding roads are generally not suitable for bus operation. Due to the nature of Stag Lane, local facilities would only be accessible by car for the majority of residents. HCC consider that the site presents no opportunities for sustainable development with constraints considered insurmountable to enable a site to align with policies that the county council would expect to see in the emerging plan</li> <li><i>Settlement Hierarchy (Core Strategy, 2011):</i> The site is located at the edge of the Key Centre of Chorleywood.</li> </ul>								
<p><b>Availability (ownership/legal issues)</b></p>								
<p>The site is in single ownership and the site was promoted by the landowner as part of a larger site (CFS18).</p>								
<p><b>Achievability</b></p>								
<p>The promoters of the site have not specified any issues regarding the viability in developing the site.</p>								
<p><b>Potential Density</b></p>								
Landowner Proposed DPH	n/a		Landowner Proposed Dwelling Range			n/a		
Indicative DPH	50		Indicative Dwelling Range			38		
<p><b>Phasing</b></p>								
0-5 years	x	6-10 years	x	11-15 years		16+ years		
<p><b>Conclusion</b></p>								
<p>The site is considered to be suitable for residential development, subject to mitigation measures to address surface water flooding. Any development must also account for the presence of the public right of way within the site. An upgrade to the wastewater network may also be necessary. The site is available and achievable.</p>								
<b>Suitable</b>	Yes		<b>Available</b>	Yes			<b>Achievable</b>	Yes




## Appendix 1 – Sites Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
CFS8d	Notley Farm, Bedmond Road	Abbots Langley	11.4
			
<b>Site Description</b>			
<p>The site is located to the immediate east of the Abbots Langley settlement. The site is comprised of greenfield land which is in agricultural use, consisting of three fields separated by tree-lined boundaries. The south-eastern field extends into a larger agricultural field. The site is mainly surrounded by agricultural land to the north and east, with residential development to the west and south and Love Lane play area adjacent to the north-west of the site.</p>			
<b>Use(s) Proposed</b>		Residential	
<b>Planning History</b>			
There is no relevant planning history on the site.			
<b>Suitability</b>			
<b>Policy Constraints:</b>		<ul style="list-style-type: none"> <li>• <b>Green Belt:</b> The site is located in the Green Belt. 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.</li> <li>• <b>Historic Environment:</b> Abbots Langley Conservation Area and two Listed Buildings lie to the west of the site. Residential development lies between them. The Heritage Impact Assessment states it is unlikely that the Conservation Area or Listed Buildings will be impacted by the development of the site and considers that the site's development would have a neutral impact on the historic environment.</li> </ul>	
<b>Physical Constraints:</b>		<ul style="list-style-type: none"> <li>• <b>Flood Zone:</b> The site is in Flood Zone 1.</li> <li>• <b>Surface Water Flood Risk:</b> There are two large surface water flow paths crossing the site, running along the southern boundary and through the centre of the site from the south-eastern corner.</li> <li>• <b>Groundwater Source Protection Zone:</b> The site falls within SPZ1 and therefore protection of groundwater must be considered</li> </ul>	
<ul style="list-style-type: none"> <li>• Green Belt</li> <li>• Heritage Assets Listed Buildings</li> <li>• Conservation Area</li> <li>• Historic Park and Garden</li> <li>• AONB</li> </ul>		<ul style="list-style-type: none"> <li>• Access</li> <li>• Flood Zone</li> <li>• Surface Water Flooding</li> <li>• Groundwater Flooding</li> <li>• Groundwater Source Protection Zone (GSPZ)</li> <li>• Contamination</li> <li>• Noise</li> </ul>	

## Appendix 1 – Sites Recommended for Consultation

<ul style="list-style-type: none"> <li>Air Quality</li> </ul>	<ul style="list-style-type: none"> <li>Thames Water state that the scale of development is likely to require upgrades to the wastewater network</li> <li><b>Access:</b> A singular access to the site is proposed from Shepherd Close, which leads off from the cul-de-sac on Jacketts Field. Shepherd Close is a private road providing access to six existing dwellings and allotment. Suitable access to the site(s) from Shepherd Close is considered to be unachievable. An alternative access to Site CFS8c considered was from Love Lane, however this would only provide a through-route to the site through a residential garden and along the northern boundary of Love Lane play area. This is outside the boundary of Site CFS8b and is not considered appropriate. A development of this size would also require two vehicular access points, which is considered to currently being resolved.</li> </ul>		
<p><b>Potential Environmental Impacts:</b></p> <ul style="list-style-type: none"> <li>Landscape Character</li> <li>Air Quality (AQMA)</li> <li>Local Wildlife Site</li> <li>Local Nature Reserve</li> <li>SSSI</li> <li>Ancient Woodland</li> <li>Tree Preservation Order</li> <li>Ancient/Veteran Tree</li> </ul>	<ul style="list-style-type: none"> <li><b>TPO:</b> There is a TPO along the western boundary of the site.</li> <li><b>Veteran and Ancient Trees:</b> There are several veteran trees and one ancient tree in the south-western area of the site.</li> <li><b>Chiltern Beechwoods SAC:</b> The site is within the Zone of Influence, further consultation with Natural England would be needed to determine the recreational impacts and any requirement for mitigation measures</li> </ul>		
<p><b>Further Constraints/Considerations:</b></p>			
<ul style="list-style-type: none"> <li>There is a public right of way running through the centre of the site.</li> <li><i>Settlement Hierarchy (Core Strategy, 2011):</i> The site is located at the edge of the Key Centre of Abbots Langley.</li> </ul>			
<p><b>Availability (ownership/legal issues)</b></p>			
<p>The site is in single ownership and the site is being promoted by the landowner.</p>			
<p><b>Achievability</b></p>			
<p>The promoters of the site have not specified any issues regarding the viability in developing the site.</p>			
<p><b>Potential Density</b></p>			
Landowner Proposed DPH	26-35	Landowner Proposed Dwelling Range	300-400
Indicative DPH	30-40	Indicative Dwelling Range	342-456
<p><b>Phasing</b></p>			
0-5 years	6-10 years	x 11-15 years	16+ years
<p><b>Conclusion</b></p>			
<p>Although access to the site is not currently available, the landowners have indicated possible solutions to this. The site is therefore considered suitable subject to the access issues being resolved. Suitable access arrangements and an allocation of eastern fields to East Lane as an extension to Leavesden Country Park and allotment improvements will be required.</p>			
<b>Suitable</b>	Yes	<b>Available</b>	Yes
<b>Achievable</b>		<b>Achievable</b>	Yes

## Appendix 1 – Sites Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
NSS23	Chorleywood Telephone Exchange Shire Lane	Chorleywood	0.11
			
 			
<b>Site Description</b>			
<p>The site is comprised of previously developed land and is in use as a Telephone Exchange. The site borders garages to the north and east. Beyond these, the site is located to the rear of shops on Shire Lane. There are residential properties including blocks of flats surrounding the site.</p>			
<b>Use(s) Proposed</b>		Residential	
<b>Planning History</b>			
<p>There is no relevant planning history on the site.</p>			
<b>Suitability</b>			
<b>Policy Constraints:</b> <ul style="list-style-type: none"> <li>Green Belt</li> <li>Heritage Assets Listed Buildings</li> <li>Conservation Area</li> <li>Historic Park and Garden</li> <li>AONB</li> </ul>		<ul style="list-style-type: none"> <li><b>Green Belt:</b> The site is not in the Green Belt.</li> <li><b>Historic Environment:</b> The site does not contain any heritage assets. Chorleywood Station Conservation Area is located to the south-east of the site, beyond residential development along Shire Lane. A detailed heritage impact assessment may be required as part of any proposals.</li> </ul>	
<b>Physical Constraints:</b> <ul style="list-style-type: none"> <li>Access</li> <li>Flood Zone</li> <li>Surface Water Flooding</li> <li>Groundwater Flooding</li> <li>Groundwater Source Protection Zone (GSPZ)</li> <li>Contamination</li> <li>Noise</li> <li>Air Quality</li> </ul>		<ul style="list-style-type: none"> <li><b>Flood Zone:</b> The site is in Flood Zone 1.</li> <li><b>Access:</b> The site is accessed from Shire Lane, via a road to the side of the New Parade Shops</li> </ul>	
<b>Potential Environmental Impacts:</b> <ul style="list-style-type: none"> <li>Landscape Character</li> <li>Air Quality (AQMA)</li> <li>Local Wildlife Site</li> </ul>		<ul style="list-style-type: none"> <li><b>Landscape Sensitivity Assessment TBD</b></li> <li>The site is within the <b>Chilterns Landscape Area</b></li> </ul>	

## Appendix 1 – Sites Recommended for Consultation

<ul style="list-style-type: none"> <li>Local Nature Reserve</li> <li>SSSI</li> <li>Ancient Woodland</li> <li>Tree Preservation Order</li> <li>Ancient/Veteran Tree</li> </ul>							
<b>Further Constraints/Considerations:</b>							
<ul style="list-style-type: none"> <li><i>Settlement Hierarchy (Core Strategy, 2011):</i> The site is located in the Key Centre of Chorleywood.</li> </ul>							
<b>Availability (ownership/legal issues)</b>							
The site is in single ownership and is being promoted by agents on behalf of the landowner.							
<b>Achievability</b>							
No issues regarding the viability in developing the site have been identified.							
<b>Potential Density</b>							
Landowner Proposed DPH	181	Landowner Proposed Dwelling Range	20-25				
Indicative DPH	136	Indicative Dwelling Range	15				
<b>Phasing</b>							
0-5 years		6-10 years	x	11-15 years		16+ years	
<b>Conclusion</b>							
The site is deemed suitable for residential development. The site is both available and achievable.							
<b>Suitable</b>	Yes	<b>Available</b>	Yes	<b>Achievable</b>	Yes		



## Appendix 2 – Sites Not Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
EOS4.0	Land adjacent to Bedmond Road & South of M25	Abbots Langley	10.18
<p>The map shows the site boundary in red, bounded by Bedmond Road to the west and the M25 motorway to the north. To the south and east are agricultural fields and woods, including Stowes Wood and Little Notley. Nearby features include Mansion House Farm, a covered reservoir, and various roads like Love Lane and East Lane. A scale bar indicates 0 to 270 meters, and a north arrow is present.</p>			
<b>Site Description</b>			
<p>The site is comprised of greenfield and is in agricultural use. The site is bounded by the M25 to the north and Bedmond Road to the west. The eastern and southern boundaries are adjacent to agricultural land. To the south of the site, there are buildings in storage and distribution use. Adjacent to the south-western corner is an existing housing allocation (H(2): Mansion House Farm), which is under construction for 17 dwellings (18/0223/FUL). There is a single-track road which leads from Bedmond Road and to the south of the site.</p>			
<b>Use(s) Proposed</b>		Residential	
<b>Planning History</b>			
<p>Land at the centre of the site has been subject to a planning application for the change of use of land to equestrian use and the erection of stable building (to accommodate 12 stables) , ménage and associated parking (19/1666/FUL); this was granted approval and is under construction. The application site measures approximately 0.5ha. Mansion House Farm is an existing housing allocation (H2) and is adjacent to the south-western corner of the site. The site is under construction into 17 dwellings (18/0223/FUL).</p>			
<b>Suitability</b>			
<b>Policy Constraints:</b>		<ul style="list-style-type: none"> <li>• <b>Green Belt:</b> The site is within the Green Belt. 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.</li> <li>• <b>Historic Environment:</b> There is a Grade II Listed Building located to the south-west of the site (Mansion House Farmhouse) and a Grade II* Listed Building to the east (Tithe Barn 20 metres north-east of Parsonage Farm). Several Locally Listed Buildings are located to the west and south-west of the site. The Heritage Impact Assessment states that development would have a minor adverse impact on the historic environment. Any application would need to be accompanied by a heritage impact statement and there should be early discussions with the conservation officer on layout and height of development.</li> </ul>	
<b>Physical Constraints:</b>		<ul style="list-style-type: none"> <li>• <b>Flood Zone:</b> The site is in Flood Zone 1.</li> </ul>	
<ul style="list-style-type: none"> <li>• Access</li> </ul>			

## Appendix 2 – Sites Not Recommended for Consultation

<ul style="list-style-type: none"> <li>• Flood Zone</li> <li>• Surface Water Flooding</li> <li>• Groundwater Flooding</li> <li>• Groundwater Source Protection Zone (GSPZ)</li> <li>• Contamination</li> <li>• Noise</li> <li>• Air Quality</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Groundwater Flood Risk:</b> The majority of the site has groundwater levels at least 5m below the ground surface. The north-western part of the site has groundwater levels between 0.5m and 5m below the ground surface.</li> <li>• <b>Access:</b> The site is currently accessed from via a single-track road from Bedmond Road, to which improvements/widening could be achieved. HCC Highways have stated that technical access is likely to be achievable but that the site is in a poor location, with minimal interaction with the existing settlement and significant distances to services or amenity. HCC Highways also state that there should be an understanding to environmental health due to existing transport infrastructure, which is likely to represent a constraint to the site.</li> <li>• <b>Noise:</b> Noise issues caused by the site's proximity to the M25 may have an impact on the site and its future occupiers</li> <li>• <b>Air Quality:</b> Air quality issues caused by the site's proximity to the M25 may have an impact on the site and its future occupiers</li> </ul>								
<p><b>Potential Environmental Impacts:</b></p> <ul style="list-style-type: none"> <li>• Landscape Character</li> <li>• Air Quality (AQMA)</li> <li>• Local Wildlife Site</li> <li>• Local Nature Reserve</li> <li>• SSSI</li> <li>• Ancient Woodland</li> <li>• Tree Preservation Order</li> <li>• Ancient/Veteran Tree</li> </ul>	<ul style="list-style-type: none"> <li>• The Landscape Sensitivity Assessment assessed the site as having medium-low sensitivity to built development.</li> </ul>								
<p><b>Further Constraints/Considerations:</b></p> <ul style="list-style-type: none"> <li>• An approximate 100m buffer would be required between the M25 and residential development. When applying a 100m buffer, the site area measures 7ha. When subtracting the area of the site which is under construction (relating to the 19/1666/FUL application), the developable area is reduced to 6.5ha.</li> <li>• <i>Settlement Hierarchy (Core Strategy, 2011):</i> The site is located at the edge of the Key Centre of Abbots Langley.</li> </ul>									
<p><b>Availability (ownership/legal issues)</b></p> <p>The site is single ownership. Part of the site is under construction into a new stable building and ménage; this part of the site could be protected excluded from the developable area. The site has been promoted alongside land to south (Site CFS8d – Notley Farm), which is in the same ownership. Notley Farm (CFS8d) is located in close proximity to the south of the site but is not adjacent to the site boundary.</p>									
<p><b>Achievability</b></p> <p>No viability issues have been identified.</p>									
<p><b>Potential Density</b></p> <table border="1"> <tr> <td>Landowner Proposed DPH</td> <td>N/A</td> <td>Landowner Proposed Dwelling Range</td> <td>N/A</td> </tr> <tr> <td>Indicative DPH</td> <td>35-50 (10.18 site) 35-50 (6.5ha site)</td> <td>Indicative Dwelling Range</td> <td>356-509 228-325</td> </tr> </table>		Landowner Proposed DPH	N/A	Landowner Proposed Dwelling Range	N/A	Indicative DPH	35-50 (10.18 site) 35-50 (6.5ha site)	Indicative Dwelling Range	356-509 228-325
Landowner Proposed DPH	N/A	Landowner Proposed Dwelling Range	N/A						
Indicative DPH	35-50 (10.18 site) 35-50 (6.5ha site)	Indicative Dwelling Range	356-509 228-325						
<p><b>Phasing</b></p> <table border="1"> <tr> <td>0-5 years</td> <td></td> <td>6-10 years</td> <td>x</td> <td>11-15 years</td> <td>x</td> <td>16+ years</td> <td></td> </tr> </table>		0-5 years		6-10 years	x	11-15 years	x	16+ years	
0-5 years		6-10 years	x	11-15 years	x	16+ years			
<p><b>Conclusion</b></p> <p>The site is deemed suitable for residential development. Any development should protect the area within the site that is undergoing a change of use to equestrian use (associated with the construction of stables, a ménage and associated parking). Consideration to heritage assets and potential environmental impacts will also need to be made as part of any future proposals. Noise and air quality issues arising from proximity to the M25 should also be taken account of. The site is both available and achievable. The site is deemed to be developable.</p>									
<table border="1"> <tr> <td><b>Suitable</b></td> <td>Yes</td> </tr> </table>	<b>Suitable</b>	Yes	<table border="1"> <tr> <td><b>Available</b></td> <td>Yes</td> </tr> </table>	<b>Available</b>	Yes	<table border="1"> <tr> <td><b>Achievable</b></td> <td>Yes</td> </tr> </table>	<b>Achievable</b>	Yes	
<b>Suitable</b>	Yes								
<b>Available</b>	Yes								
<b>Achievable</b>	Yes								

## Appendix 2 – Sites Not Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
PCS21	Land at Love Lane	Abbots Langley	1.3
<b>Site Description</b>			
<p>The site is located to the north-east of Abbots Langley and is comprised of greenfield land. The site is in use as open grassland, with an underground covered reservoir to the north-east of the site. There is a mast adjacent to the south-eastern boundary. There is a narrow access road from Love Lane included within the boundary. The outer site boundaries of the site are formed by vegetation. The site wraps around an elevated area of greenspace that is separate from the site. Love Lane runs to the south of the site, which is also a public footpath. There are residential houses adjacent to the west of the site with a more substantial development to the south along Summerhouse Way. Abbots Langley High Street is located to the south-west. The M25 is close to the site and is situated to the north.</p>			
<b>Use(s) Proposed</b>		Residential	
<b>Planning History</b>			
There is no relevant planning history on the site.			
<b>Suitability</b>			
<b>Policy Constraints:</b> <ul style="list-style-type: none"> <li>Green Belt</li> <li>Heritage Assets Listed Buildings</li> <li>Conservation Area</li> <li>Historic Park and Garden</li> <li>AONB</li> </ul>		<ul style="list-style-type: none"> <li><b>Green Belt:</b> The site is within the Green Belt. 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.</li> <li><b>Historic Environment:</b> There are no heritage assets on the site. The site abuts the northern end of the Abbots Langley Conservation Area and immediately west lies Mansion House Farmhouse, a Grade II Listed Building. There are also several Locally Listed Buildings to the west of the site. The Heritage Impact Assessment states that the site's development a minor adverse impact on the heritage assets; a detailed heritage impact assessment and any necessary mitigation would be required early on in the design process.</li> <li><b>Archaeology:</b> HCC Historic Environment advise that the site includes/has potential to include heritage assets of archaeological interest; any development proposals on the site</li> </ul>	

## Appendix 2 – Sites Not Recommended for Consultation

	should be accompanied by a pre-application or pre-determination archaeological assessment.		
<b>Physical Constraints:</b> <ul style="list-style-type: none"> <li>• Access</li> <li>• Flood Zone</li> <li>• Surface Water Flooding</li> <li>• Groundwater Flooding</li> <li>• Groundwater Source Protection Zone (GSPZ)</li> <li>• Contamination</li> <li>• Noise</li> <li>• Air Quality</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Flood Zone:</b> The site is in Flood Zone 1.</li> <li>• <b>Access:</b> The current site access is from Love Lane, which is a single-file narrow road leading on from Bedmond Road. It is likely that improvements would need to be made in order to achieve suitable access from Love Lane. Access could potentially be provided from the adjacent site to the north (Site CFS6).</li> </ul>		
<b>Potential Environmental Impacts:</b> <ul style="list-style-type: none"> <li>• Landscape Character</li> <li>• Air Quality (AQMA)</li> <li>• Local Wildlife Site</li> <li>• Local Nature Reserve</li> <li>• SSSI</li> <li>• Ancient Woodland</li> <li>• Tree Preservation Order</li> <li>• Ancient/Veteran Tree</li> </ul>	<ul style="list-style-type: none"> <li>• The Landscape Sensitivity Assessment classifies the site as having medium-low sensitivity to built development.</li> <li>• <b>Wastewater:</b> Thames Water have advised that the scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. The plan should determine the magnitude of spare capacity currently available within the network and what phasing may be required to ensure development does not outpace delivery of essential network upgrades to accommodate future development.</li> </ul>		
<b>Further Constraints/Considerations:</b>			
<ul style="list-style-type: none"> <li>• A public right of way is adjacent to the southern boundary, along Love Lane.</li> <li>• There is a mast adjacent to the south-eastern boundary; this is surrounded by fencing.</li> <li>• <i>Settlement Hierarchy (Core Strategy, 2011):</i> The site is located at the edge of the Key Centre of Abbots Langley.</li> <li>• HCC Highways will only support this site and CFS6 (either site, alone or together going forward) if significant sustainable mitigation is provided.</li> </ul>			
<b>Availability (ownership/legal issues)</b>			
The site is in single ownership and is being promoted by the landowner.			
<b>Achievability</b>			
The promoters of the site have not specified any issues regarding the viability in developing the site.			
<b>Potential Density</b>			
Landowner Proposed DPH	N/A	Landowner Proposed Dwelling Range	N/A
Indicative DPH	35-50	Indicative Dwelling Range	45-65
<b>Phasing</b>			
0-5 years	x	6-10 years	11-15 years      16+ years
<b>Conclusion</b>			
The site is deemed suitable for residential development. Appropriate mitigation of the impact on the historic environment will be required and suitable access arrangements will need to be achieved. The site is both available and achievable. The site is deemed deliverable.			
<b>Suitable</b>	Yes	<b>Available</b>	Yes <b>Achievable</b> Yes

## Appendix 2 – Sites Not Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
CFS6	Land at Mansion House Equestrian Centre	Abbots Langley	2.8
<b>Site Description</b>			
<p>The site is comprised of greenfield land currently used as grazing land for horses and an equestrian centre. There is vegetation along all boundaries of the site. Access to the site could be provided from Bedmond Road. The equestrian centre is located to the east of the site and has approval for redevelopment into 17 dwellings (18/0223/FUL). The majority of the surrounding land is comprised of agricultural, open land farmland, with residential development to the south of the site.</p>			
<b>Use(s) Proposed</b>		Residential	
<b>Planning History</b>			
<p>There is no relevant planning history on Site CFS6. Mansion House Equestrian Centre, adjacent to the east of the site, has a planning permission for redevelopment into 17 units (18/0223/FUL) and is under construction.</p>			
<b>Suitability</b>			
<b>Policy Constraints:</b> <ul style="list-style-type: none"> <li>Green Belt</li> <li>Heritage Assets Listed Buildings</li> <li>Conservation Area</li> <li>Historic Park and Garden</li> <li>AONB</li> </ul>		<ul style="list-style-type: none"> <li><b>Green Belt:</b> The site is located in the Green Belt. 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.</li> <li><b>Historic Environment:</b> Mansion House Farmhouse, a Grade II Listed Building, lies immediately to the west of the site. The Heritage Impact Assessment states that the site's development would have a minor adverse impact on the historic environment, as development of the site would separate the heritage asset from its setting within the historic agrarian landscape. A detailed Heritage Impact Assessment and discussion with the Conservation Officer would be required at an early stage in the design process of any proposals on the site, in order to mitigate the impact on the heritage asset.</li> <li><b>Archaeology:</b> HCC Historic Environment advise that the site includes/has potential to include heritage assets of archaeological interest; any development proposals on the site should be accompanied by a pre-application or pre-determination archaeological assessment.</li> </ul>	
<b>Physical Constraints:</b>		<ul style="list-style-type: none"> <li><b>Flood Zone:</b> The site is in Flood Zone 1.</li> </ul>	

## Appendix 2 – Sites Not Recommended for Consultation

<ul style="list-style-type: none"> <li>• Access</li> <li>• Flood Zone</li> <li>• Surface Water Flooding</li> <li>• Groundwater Flooding</li> <li>• Groundwater Source Protection Zone (GSPZ)</li> <li>• Contamination</li> <li>• Noise</li> <li>• Air Quality</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Access:</b> Access could be provided from Bedmond Road, which would be via the adjacent Equestrian Centre which is under construction into 17 dwellings (18/0223/FUL). HCC Growth and Infrastructure state that an access strategy would need to be developed, and that HCC would only support development of the site if mitigation is discussed with the developer and transport consultant</li> </ul>								
<p><b>Potential Environmental Impacts:</b></p> <ul style="list-style-type: none"> <li>• Landscape Character</li> <li>• Air Quality (AQMA)</li> <li>• Local Wildlife Site</li> <li>• Local Nature Reserve</li> <li>• SSSI</li> <li>• Ancient Woodland</li> <li>• Tree Preservation Order</li> <li>• Ancient/Veteran Tree</li> </ul>	<ul style="list-style-type: none"> <li>• The Landscape Sensitivity Assessment classifies the site as having a medium-low sensitivity to built development.</li> </ul>								
<p><b>Further Constraints/Considerations:</b></p> <ul style="list-style-type: none"> <li>• A public right of way runs along the south of the site, from Love Lane. HCC consider that Public Right of Way No.29 should be recognised and protected.</li> <li>• <i>Settlement Hierarchy (Core Strategy, 2011):</i> The site is located at the edge of the Key Centre of Abbots Langley.</li> </ul>									
<p><b>Availability (ownership/legal issues)</b></p> <p>The site is in joint ownership and the site is being promoted by the landowners.</p>									
<p><b>Achievability</b></p> <p>The promoters of the site have not specified any issues regarding the viability in developing the site.</p>									
<p><b>Potential Density</b></p> <table border="1"> <tr> <td>Landowner Proposed DPH</td> <td>24</td> <td>Landowner Proposed Dwelling Range</td> <td>68</td> </tr> <tr> <td>Indicative DPH</td> <td>35-50</td> <td>Indicative Dwelling Range</td> <td>100-140</td> </tr> </table>		Landowner Proposed DPH	24	Landowner Proposed Dwelling Range	68	Indicative DPH	35-50	Indicative Dwelling Range	100-140
Landowner Proposed DPH	24	Landowner Proposed Dwelling Range	68						
Indicative DPH	35-50	Indicative Dwelling Range	100-140						
<p><b>Phasing</b></p> <table border="1"> <tr> <td>0-5 years</td> <td>x</td> <td>6-10 years</td> <td>x</td> <td>11-15 years</td> <td></td> <td>16+ years</td> <td></td> </tr> </table>		0-5 years	x	6-10 years	x	11-15 years		16+ years	
0-5 years	x	6-10 years	x	11-15 years		16+ years			
<p><b>Conclusion</b></p> <p>The site is deemed suitable for residential development. Any development of the site would need to take account of public right of ways. Consideration of the impact on heritage assets and potential environmental impacts will also need to be taken as part of any future proposals. The site is deemed developable.</p>									
<table border="1"> <tr> <td><b>Suitable</b></td> <td>Yes</td> <td><b>Available</b></td> <td>Yes</td> <td><b>Achievable</b></td> <td>Yes</td> </tr> </table>	<b>Suitable</b>	Yes	<b>Available</b>	Yes	<b>Achievable</b>	Yes			
<b>Suitable</b>	Yes	<b>Available</b>	Yes	<b>Achievable</b>	Yes				

## Appendix 2 – Sites Not Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
NSS18	Catlips Farm, Berry Lane	Chorleywood	21.8
<b>Site Description</b>			
<p>The site is located in Chorleywood, north of Shepherds Lane. The site is comprised mainly of agricultural greenfield land, as well as an area of woodland, part of Pheasant's Wood. There is an existing livery stables within the site. The site is bordered to the south by Shepherds Lane, and to the east by the M25. The north of the site is bordered by Pheasants Wood, with Berry Lane beyond. To the west there are further agricultural fields.</p>			
<b>Use(s) Proposed</b>		Residential	
<b>Planning History</b>			
There is no relevant planning history on the site.			
<b>Suitability</b>			
<b>Policy Constraints:</b> <ul style="list-style-type: none"> <li>Green Belt</li> <li>Heritage Assets Listed Buildings</li> <li>Conservation Area</li> <li>Historic Park and Garden</li> <li>AONB</li> </ul>		<ul style="list-style-type: none"> <li><b>Green Belt:</b> The site is located in the Green Belt. The Stage 2 Green Belt Review assessed harm to the Green Belt of releasing the wider parcel CH3 (in which the site is located) as moderate-high.</li> <li><b>Historic Environment:</b> There are no heritage assets within the site boundary</li> </ul>	
<b>Physical Constraints:</b> <ul style="list-style-type: none"> <li>Access</li> <li>Flood Zone</li> <li>Surface Water Flooding</li> <li>Groundwater Flooding</li> <li>Groundwater Source Protection Zone (GSPZ)</li> <li>Contamination</li> <li>Noise</li> <li>Air Quality</li> </ul>		<ul style="list-style-type: none"> <li><b>Flood Zone:</b> The site is in Flood Zone 1</li> <li><b>Surface Water Flood Risk:</b> Most of the site is at negligible risk of surface water flooding. There are two small areas in the centre of the site at medium risk.</li> <li><b>Groundwater Flood Risk:</b> Groundwater levels of the site are at least 5m below the ground surface.</li> <li><b>GSPZ:</b> GSPZ3</li> <li><b>Access:</b> Main access to the site would be from Shepherds Lane, at the south of the site. Access may be possible from Berry Lane to the northwest. Shepherds Lane is a single track road with no footway, becoming a two lane road with a pavement to one side</li> </ul>	

## Appendix 2 – Sites Not Recommended for Consultation

	just before reaching the M25, which it crosses underneath. Berry Lane is a single track road with passing places.				
<b>Potential Environmental Impacts:</b> <ul style="list-style-type: none"> <li>• Landscape Character</li> <li>• Air Quality (AQMA)</li> <li>• Local Wildlife Site</li> <li>• Local Nature Reserve</li> <li>• SSSI</li> <li>• Ancient Woodland</li> <li>• Tree Preservation Order</li> <li>• Ancient/Veteran Tree</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Landscape Sensitivity Assessment TBD</b></li> <li>• <b>Local Wildlife Site:</b> The woodland area in the east of the site is part of a Local Wildlife Site, which extends to cover the woods north of the site boundary</li> <li>• <b>Open Space:</b> Pheasants Wood is designated Open Space, and a portion of the woodland is within the site boundary</li> </ul>				
<b>Further Constraints/Considerations:</b>					
<ul style="list-style-type: none"> <li>• <i>Settlement Hierarchy (Core Strategy, 2011):</i> The site is outside of any defined settlement, and lies between Chorleywood and Mill End, which are defined as Key Centres in the Settlement Hierarchy.</li> <li>• There is a Public Right of Way which runs along the east of the site, crossing over the M25 from The Queens Drive and passing through Pheasants Wood along the site boundary.</li> </ul>					
<b>Availability (ownership/legal issues)</b>					
The site is in single ownership and the site is being promoted by the landowner.					
<b>Achievability</b>					
The promoters of the site have not specified any issues regarding the viability in developing the site.					
<b>Potential Density</b>					
Landowner Proposed DPH	13.8	Landowner Proposed Dwelling Range	300		
Indicative DPH	13.8	Indicative Dwelling Range	300		
<b>Phasing</b>					
0-5 years	x	6-10 years		11-15 years	16+ years
<b>Conclusion</b>					
The site is within a parcel of Green Belt which is considered to be a risk of moderate-high harm if released. The site is washed over by the Green Belt and is not at the edge of a settlement as defined in the Settlement Hierarchy. The accesses to the site from both Shepherds Lane and Berry Lane are considered unsuitable for the level of development proposed.					
<b>Suitable</b>	No	<b>Available</b>	Yes	<b>Achievable</b>	Yes



## Appendix 2 – Sites Not Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
NSS20	Land adj. RES site, Egg Farm Lane	Kings Langley	7
<b>Site Description</b>			
<p>The site consists of open greenfield land which is in agricultural use, as well as a site occupied with building and car parking for RES. The site's northern and eastern boundaries are formed by Egg Farm Lane, the west by a tree buffer, and the south by the M25 motorway. There is a wind turbine located to the immediate south.</p>			
<b>Use(s) Proposed</b>		Residential	
<b>Planning History</b>			
23/0246/RSP – part retrospective application to convert existing agricultural land into recreation space for RES employees			
<b>Suitability</b>			
<b>Policy Constraints:</b>		<ul style="list-style-type: none"> <li>• <b>Green Belt:</b> The site is in the Green Belt. The Stage 2 Green Belt Review assessed harm to the Green Belt of releasing the wider parcel KL3 (in which the site is located) as high.</li> <li>• <b>Historic Environment:</b> There are several Locally Listed Buildings within the site, associated with Ovaltine Egg Farm. Any future proposals should take this into account.</li> </ul>	
<b>Physical Constraints:</b>		<ul style="list-style-type: none"> <li>• <b>Flood Zone:</b> The site is in Flood Zone 1.</li> <li>• <b>Groundwater Flood Risk:</b> Levels are between 0.025m and 5m below the ground surface.</li> <li>• <b>Access:</b> Access exists from Egg Farm Lane although this is a narrow road and improvements would likely be required</li> <li>• <b>Noise:</b> Noise issues caused by the site's proximity to the M25 and the railway line may have an impact on the site and its future occupiers.</li> </ul>	
<b>Potential Environmental Impacts:</b>		<ul style="list-style-type: none"> <li>• <b>Local Wildlife Site:</b> There are Local Wildlife Sites (Numbers Farm Area) to the north and east of the site, though they are not within the site boundary.</li> </ul>	

## Appendix 2 – Sites Not Recommended for Consultation

<ul style="list-style-type: none"> <li>Local Wildlife Site</li> <li>Local Nature Reserve</li> <li>SSSI</li> <li>Ancient Woodland</li> <li>Tree Preservation Order</li> <li>Ancient/Veteran Tree</li> </ul>	<ul style="list-style-type: none"> <li><b>TPO:</b> The trees which form the western boundary of the site are protected under TPO727 (Kings Langley Station Car Park). There two further groups of trees at the northern edge of the site which are protected under TPO317.</li> <li>The site falls within the <b>Central River Valleys Landscape Area</b></li> </ul>				
<b>Further Constraints/Considerations:</b>					
<ul style="list-style-type: none"> <li>A public right of way runs along the northern boundary of the site.</li> <li><i>Settlement Hierarchy (Core Strategy, 2011):</i> The site is located at the edge of the Secondary Centre of Kings Langley.</li> </ul>					
<b>Availability (ownership/legal issues)</b>					
The site is in single ownership and the site is being promoted by the landowner.					
<b>Achievability</b>					
The promoters of the site have not specified any issues regarding the viability in developing the site.					
<b>Potential Density</b>					
Landowner Proposed DPH	30-35	Landowner Proposed Dwelling Range	200-250		
Indicative DPH	50	Indicative Dwelling Range	350		
<b>Phasing</b>					
0-5 years	x	6-10 years	11-15 years	16+ years	
<b>Conclusion</b>					
The site is both available and achievable.					
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 high. The site is not strategic in scale and it is therefore considered that it does not justify the high harm to the Green Belt in releasing the site. The site is therefore deemed unsuitable.					
The site is therefore not deemed to be developable.					
<b>Suitable</b>	No	<b>Available</b>	Yes	<b>Achievable</b>	Yes

## Appendix 2 – Sites Not Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
NSS21	Land between Adams House and Five Oaks, London Road	Batchworth	0.24
<b>Site Description</b>			
<p>The site consists of greenfield land between two residential properties, accessed from London Road. The site previously formed part of the gardens of Adams House and Five Oaks. The site is bordered to the south by London Road (A404), and to the north by Rickmansworth Golf Club. There is low-density development along London Road.</p>			
<b>Use(s) Proposed</b>		Residential (including self-build)	
<b>Planning History</b>			
<p><b>09/0183/FUL</b> – Erection of two storey dwelling, detached double garage with accommodation above, re-location of vehicular access, new gravel driveway and erection of close board fencing to frontage – <b>Refused</b> on 16<sup>th</sup> April 2009, appeal dismissed.</p>			
<b>Suitability</b>			
<p><b>Policy Constraints:</b></p> <ul style="list-style-type: none"> <li>Green Belt</li> <li>Heritage Assets Listed Buildings</li> <li>Conservation Area</li> <li>Historic Park and Garden</li> <li>AONB</li> </ul>		<ul style="list-style-type: none"> <li><b>Green Belt:</b> The site is in the Green Belt. The Stage 2 Green Belt Review assessed harm to the Green Belt of releasing the wider parcel BW4 (in which the site is located) as moderate-high</li> <li>There are no heritage assets in the vicinity of the site</li> </ul>	
<p><b>Physical Constraints:</b></p> <ul style="list-style-type: none"> <li>Access</li> <li>Flood Zone</li> <li>Surface Water Flooding</li> <li>Groundwater Flooding</li> <li>Groundwater Source Protection Zone (GSPZ)</li> <li>Contamination</li> <li>Noise</li> <li>Air Quality</li> </ul>		<ul style="list-style-type: none"> <li><b>Flood Zone:</b> The site is in Flood Zone 1.</li> <li><b>Groundwater Source Protection Zone:</b> The site is within GSPZ2</li> <li><b>Access:</b> There is existing access from the site onto London Road</li> </ul>	

## Appendix 2 – Sites Not Recommended for Consultation

<b>Potential Environmental Impacts:</b> <ul style="list-style-type: none"> <li>Landscape Character</li> <li>Air Quality (AQMA)</li> <li>Local Wildlife Site</li> <li>Local Nature Reserve</li> <li>SSSI</li> <li>Ancient Woodland</li> <li>Tree Preservation Order</li> <li>Ancient/Veteran Tree</li> </ul>		<ul style="list-style-type: none"> <li><b>Local Wildlife Site:</b> A Local Wildlife Site is directly adjacent to the northern boundary of the site</li> <li><b>TPO:</b> The whole site is covered by TPO607</li> <li>The site falls within the <b>South Herts Plateau Landscape Area</b></li> <li><b>Landscape Sensitivity TBD</b></li> </ul>	
<b>Further Constraints/Considerations:</b> <ul style="list-style-type: none"> <li><i>Settlement Hierarchy (Core Strategy, 2011):</i> The site is located in Batchworth Park which is classified as an “Other Settlement” in the Settlement Hierarchy. The site is approximately 450m from the boundary of the Principal Town of Rickmansworth.</li> </ul>			
<b>Availability (ownership/legal issues)</b>			
The site is in single ownership and the site is being promoted by the landowner.			
<b>Achievability</b>			
The promoters of the site have not specified any issues regarding the viability in developing the site.			
<b>Potential Density</b>			
Landowner Proposed DPH	21	Landowner Proposed Dwelling Range	5
Indicative DPH	21	Indicative Dwelling Range	5
<b>Phasing</b>			
0-5 years	X	6-10 years	11-15 years
			16+ years
<b>Conclusion</b>			
The site is washed over by the Green Belt and is not located within or at the edge of a higher tier settlement or an inset village. Harm to the Green Belt of releasing land on which the site is located is considered to be at least moderate-high and the site is non-strategic. Allocating the site would not outweigh harm to the Green Belt, if released.			
The site is not located in a sustainable location. It is therefore considered unsuitable for residential development.			
<b>Suitable</b>	No	<b>Available</b>	Yes
<b>Achievable</b>			Yes

## Appendix 2 – Sites Not Recommended for Consultation

Site Ref	Address	Settlement	Site Area (ha)
NSS22	Lonsdale 19 Hyde Lane	Kings Langley	1.58
<b>Site Description</b>			
<p>The site currently consists of a detached dwelling, with an outbuilding which includes a gym, swimming pool, and snooker room plus 4 garages, as well as a large garden. The southern boundary is formed by Hyde Lane, which is a single-track road with no footpath. The northern and eastern boundaries are adjacent to open agricultural and greenfield land, and the western boundary is formed of a wide boundary of trees between the dwelling and the adjacent low density residential development along Hyde Lane.</p>			
<b>Use(s) Proposed</b>		Residential	
<b>Planning History</b>			
<p>12/0018/REF - Certificate of Lawfulness Proposed Development: Proposed erection of an outbuilding to accommodate a swimming pool with changing facilities, gym and games room, incidental to the enjoyment of the dwellinghouse – Allowed at Appeal</p>			
<b>Suitability</b>			
<b>Policy Constraints:</b> <ul style="list-style-type: none"> <li>Green Belt</li> <li>Heritage Assets Listed Buildings</li> <li>Conservation Area</li> <li>Historic Park and Garden</li> <li>AONB</li> </ul>		<ul style="list-style-type: none"> <li><b>Green Belt:</b> The site is in the Green Belt. The site was not assessed as part of the Stage 2 Green Belt Review. The Stage 2 Green Belt Review states that the release of any land outside the assessment area would result in at least high harm to the Green Belt. The Stage 2 Green Belt Review assessed harm to the Green Belt of releasing parcel HH1, which borders the site to the north, as very high.</li> <li><b>Historic Environment:</b> There are no Heritage Assets within the vicinity of the site and the site is not within a Conservation Area.</li> </ul>	
<b>Physical Constraints:</b> <ul style="list-style-type: none"> <li>Access</li> <li>Flood Zone</li> <li>Surface Water Flooding</li> <li>Groundwater Flooding</li> <li>Groundwater Source Protection Zone (GSPZ)</li> <li>Contamination</li> </ul>		<ul style="list-style-type: none"> <li><b>Flood Zone:</b> The site is in Flood Zone 1.</li> <li><b>Access:</b> There is existing driveway access to Hyde Lane. This is a single-track road with no pavement and improvements would likely be required.</li> <li><b>Landscape Sensitivity TBD</b></li> </ul>	

## Appendix 2 – Sites Not Recommended for Consultation

<ul style="list-style-type: none"> <li>Noise</li> <li>Air Quality</li> </ul>			
<b>Potential Environmental Impacts:</b> <ul style="list-style-type: none"> <li>Landscape Character</li> <li>Air Quality (AQMA)</li> <li>Local Wildlife Site</li> <li>Local Nature Reserve</li> <li>SSSI</li> <li>Ancient Woodland</li> <li>Tree Preservation Order</li> <li>Ancient/Veteran Tree</li> </ul>		<ul style="list-style-type: none"> <li><b>Local Wildlife Site:</b> The northeast corner of the site borders a Local Wildlife Site</li> <li><b>TPO:</b> There are several trees and groups of trees protected by TPO599, located within the west and south of the site</li> <li>The site falls within the <b>Central River Valleys Landscape Area</b></li> </ul>	
<b>Further Constraints/Considerations:</b>			
<ul style="list-style-type: none"> <li><i>Settlement Hierarchy (Core Strategy, 2011):</i> Part of the site is located within the Secondary Centre of Kings Langley.</li> <li>HCC Highways have also stated that a significant increase in traffic along Hyde Lane, which is expected from the site, would not be acceptable. It is therefore considered unsuitable for residential development.(stated in relation to EOS8.1, Land south of Hyde Lane)</li> </ul>			
<b>Availability (ownership/legal issues)</b>			
The site is in single ownership and the site is being promoted by the landowner.			
<b>Achievability</b>			
The promoters of the site have not specified any issues regarding the viability in developing the site.			
<b>Potential Density</b>			
Landowner Proposed DPH	5.7	Landowner Proposed Dwelling Range	9
Indicative DPH	30-50	Indicative Dwelling Range	47-79
<b>Phasing</b>			
0-5 years	X	6-10 years	11-15 years 16+ years
<b>Conclusion</b>			
The site is located in the Green Belt. Harm to the Green Belt of releasing land on which the site is located is considered to be at least high and the site is non-strategic. Allocating the site would not outweigh harm to the Green Belt, if released.			
<b>Suitable</b>	No	<b>Available</b>	Yes
		<b>Achievable</b>	Yes



Three Rivers District Local Plan  
Additional Sites for Potential Allocation  
Sustainability Appraisal Working Note

January 2023

## Report details

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Minal Jose	Project Manager	Rob Gardner	Technical Reviewer

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## Contents amendment record

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## Table of Contents

1	Introduction	1
2	Methodology	1
2.1	SA Framework of Objectives	2
3	Assessment of Sites	3
3.1	Introduction	3
3.2	Site Assessment Summary	3
3.3	Settlement level effects	5
4	Next steps	7
Appendix A	New Site and Amended and Reconsidered Site Assessments	A-1

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## 1 Introduction

Three Rivers District Council (TRDC) are preparing a single Local Plan which will replace the Core Strategy (adopted on 17th October 2011), the Development Management Policies Local Development Document (adopted on 26th July 2013) and the Site Allocations Local Development Document (adopted on 25th November 2014). The new Local Plan will incorporate strategic policies, development management policies and site allocations into a single document.

During its preparation this Local Plan must be subject to both Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) under the 'Planning and Compulsory Purchase Act' (2004) and 'The Environmental Assessment of Plans and Programmes Regulations' (2004)<sup>1</sup> respectively.

Both the SA and the SEA processes help planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans through a structured assessment of the Plan against key sustainability issues.

Independent consultants TRL Ltd have been appointed by Three Rivers District Council to undertake the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in support of the new Local Plan. This has resulted in the production of an SA Scoping Report (May 2017, updated July 2017); an SA Working Note to accompany the Issues and Options consultation (July 2017); an SA Working Note to accompany the 'Potential Sites for Consultation' (October 2018, updated July 2019); and an Initial SA Report alongside the Local Plan Regulation 18 consultation (June 2021). These SA documents are available at the following weblink:

<https://www.threerivers.gov.uk/egcl-page/new-local-plan>

The Council plan to undertake an additional Regulation 18 consultation in early 2023 on Additional Sites for Potential Allocation, which includes new sites submitted through the response to Regulation 18 Consultation in 2021.

This new Working Note (January 2023) is a focused document which adds to the information provided in the Initial SA Report by providing assessments for the 18 new sites and two amended and reconsidered sites which are now proposed for allocation.

## 2 Methodology

For the Local Plan options an assessment has been undertaken, with each 'Policy/Site option v. SA objective relationship' being 'scored' using the significance criteria shown in Figure 2-1. The assessment scoring is supported by a brief assessment commentary to provide the rationale behind the scores allocated (see Appendix A for the individual site assessments).

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<sup>1</sup> This regulation implements European Directive 2001/42/EC, known as the Strategic Environmental Assessment (SEA) Directive

Significance Assessment	Description
✓✓	The option is likely to have a significant positive effect
✓	The option is likely to have a positive effect which is not significant
?	Uncertain – It is uncertain how or if the option impacts on the SA/SEA objective
–	Neutral – The option is unlikely to impact on the SA/SEA objective
✗	The option is likely to have a negative effect which is not significant
✗✗	The option is likely to have a significant negative effect
✓/✗	The option is likely to have some positive and some negative effects, none of which are significant

**Figure 2-1: Significance criteria**

## 2.1 SA Framework of Objectives

Informed by the issues identified, a framework of SA/SEA objectives has been developed covering a range of environmental, social and economic topics.

The main objectives (shown in Table 2-1) are supported by a series of sub-objectives and site-specific questions, which provide greater detail on the issues to consider during the assessments. These SA objectives will be used to structure and inform the assessment of the Local Plan through all stages of its development. The full SA Framework is not repeated here but can be found in Appendix A of the Interim SA Report (June 2021).

**Table 2-1 SA Framework of Objectives**

<p>The SA/SEA Objectives against which the options have been assessed are as follows:</p> <p>SA1. To protect, maintain and enhance biodiversity and geodiversity at all levels</p> <p>SA2. To protect, maintain and enhance water resources (including water quality and quantity)</p> <p>SA3. To reduce flood risk</p> <p>SA4. Reduce greenhouse gas emissions and adapt to the effects of climate</p> <p>SA5. Achieve good air quality, especially in urban areas</p> <p>SA6. Make efficient use of land and protect soils</p> <p>SA7. To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible</p> <p>SA8. To identify, maintain and enhance the historic environment and heritage assets</p> <p>SA9. To conserve and enhance landscape and townscape character and encourage local distinctiveness</p> <p>SA10. To improve the health and wellbeing of the local population</p> <p>SA11. To develop in sustainable locations</p> <p>SA12. To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime</p> <p>SA13. Ensure that everyone has access to good quality housing that meets their needs</p> <p>SA14. Achieve sustainable levels of prosperity and economic growth</p> <p>SA15. To ensure local residents have employment opportunities and access to training</p>
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## 3 Assessment of Sites

### 3.1 Introduction

This section provides information on the assessments of new sites (NSS sites) which have been put forward since the consultation on the Regulation 18 Plan in June 2021, as well amended and reconsidered sites which are now proposed for allocation.

The assessments have been undertaken using the same methodology as previously used for the assessment of sites in the SA Working Note to accompany the ‘Potential Sites for Consultation’ (October 2018, updated July 2019) and the Initial SA Report (June 2021) which assessed the sites proposed for allocation in the Regulation Part 2 Local Plan, as well as sites which were not selected for allocation in Part 2.

A factor to note for the assessments of the sites is that since the previous assessments were undertaken for the Initial SA Report (June 2021) there is now a requirement for new developments to provide a biodiversity net-gain. Whilst this will influence the potential effects on biodiversity from development of a particular site and cumulatively across all sites, in order to remain consistent with the previous assessments this factor has not been taken into consideration in the assessments of the NSS sites.

The assessments against the Landscape objective (SA9) for the NSS sites have been informed by the Landscape Sensitivity Assessment Addendum II<sup>2</sup>.

### 3.2 Site Assessment Summary

The detailed assessments for the new sites and additional sites are included in Appendix A, with the findings summarised in Table 3-1 below.

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<sup>2</sup> Place Services, Three Rivers District Council Landscape Sensitivity Assessment – Addendum II October 2022  
DRAFT

**Table 3-1 Summary of Site Assessments**

The four NSS sites which are proposed for allocation in the Local Plan are denoted by the symbol “★”

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Location															
<b>Abbots Langley and Leavesden</b>															
Site Ref: NSS13 Land to the rear of The Shires High Elms Lane	x	-	-	✓	-	x	-	?	x	✓	✓	✓	✓	-	-
Site Ref: NSS14 Margaret House, Abbots Langley ★	?	-	-	✓	-	✓	-	?	x	✓	✓	✓	✓	?	?
Site Ref CFS8d Notley Farm, Bedmond Road, Abbots Langley (Amended and reconsidered site)	x	-	-	✓	-	x	-	?	x	?	✓	✓	✓	-	-
Site Ref CFS26e The Kings Langley Estate, Abbots Langley (Amended and reconsidered site)	x	-	-	✓	?	x	-	?	x	?	✓	✓	✓	x	-
<b>Bedmond</b>															
Site Ref: NSS2 56 High Street, Bedmond ★	?	-	?	✓	-	✓	-	?	?	?	✓	?	✓	x	x
Site Ref: NSS3 Land Between Bell Lane and Millhouse Lane, Bedmond	x	-	-	✓	-	?	-	-	x	?	✓	-	✓	-	-
Site Ref: NSS6 North Cott, East Lane, Bedmond ★	x	-	-	✓	?	x	-	?	-	?	✓	✓	✓	-	-
Site Ref: NSS12 Land between Bell Lane and Millhouse Lane	x	-	-	✓	-	x	-	-	x	?	✓	-	✓	-	-
Site Ref: NSS15 Land adj. Newlands Park	x	-	-	x	-	x	-	-	-	x	x	-	✓	-	-
<b>Garston – no NSS sites</b>															
<b>Kings Langley</b>															
Site Ref: NSS8 Land at Hilltop Farm, Kings Langley	x	-	-	x	-	x	-	-	?	✓	x	✓	✓	-	-
Site Ref: NSS9 Land adjacent to 235 Toms Lane	x	-	-	✓	-	x	-	-	x	✓	✓	✓	✓	-	-
<b>Langlebury – no NSS sites</b>															
<b>Croxley Green – no NSS sites</b>															
<b>Rickmansworth – no NSS sites</b>															
<b>Mill End – no NSS sites</b>															
<b>Chorleywood</b>															
Site Ref: NSS4 Cedar’s Village, Chorleywood, WD3 5GL	x	-	-	✓	?	✓	-	?	x	?	✓	-	✓	-	-
<b>Maple Cross &amp; West Hyde</b>															
Site Ref: NSS1 1 Denham Way, Maple Cross (Employment use)	x	?	-	✓	-	x	-	-	?	-	✓	✓	-	✓	✓
Site Ref: NSS1 1 Denham Way, Maple Cross (Residential use)	x	?	-	x	-	x	-	-	?	?	x	-	✓	-	-
Site Ref: NSS5 Clancy Group HQ, Harefield	x	?	?	x	-	✓	-	?	?	✓	x	✓	✓	x	x
Site Ref: NSS16 Sunnyhill Road	?	?	-	x	?	✓	-	-	-	?	x	✓	✓	x	x
<b>Moor Park and Eastbury – no NSS sites</b>															

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Location															
<b>Oxhey Hall – no NSS sites</b>															
<b>South Oxhey – no NSS sites</b>															
<b>Carpenders Park – no NSS sites</b>															
<b>Sarratt</b>															
Site Ref: NSS7 Fir Trees, Dawes Lane, Sarratt	x	-	-	x	-	✓/x	-	-	?	?	x	?	✓	-	-
Site Ref: NSS11a Land at Sarratt, Sarratt Road, Sarratt. Parcel 1.	x	-	?	x	-	x	-	?	x	?	x	✓	✓	✓	✓
Site Ref: NSS11b Land at Sarratt, New Road, Sarratt. Parcel 2.	x	-	-	x	-	x	-	?	x	?	x	-	✓	-	-
<b>Belsize</b>															
Site Ref: NSS17 The Puffing Field Windmill Hill Chipperfield	x	-	?	x	-	x	-	?	?	?	x	-	✓	-	-
<b>Hunton Bridge</b>															
Site Ref: NSS10 Land at Mill Place, Watford Road *	?	?	-	x	?	✓	-	?	-	?	x	-	✓	x	x

The assessments of the sites against the 15 SA Objectives did not identify any significant effects, either positive or negative.

### 3.3 Settlement level effects

In addition to the site-specific effects associated with the proposed housing allocations, as summarised in Section 3.2 it is also necessary to consider any ‘settlement level’ effects, for example the cumulative effects that might result from the overall housing increase in a settlement. The approach taken by the SA at the Regulation 18 stage has been to base such assessments on the percentage level of dwelling number increase in a settlement which would result from the delivery of the proposed housing allocations in the Regulation 18 Local Plan Part 2 Sites for Potential Allocation – as updated by this additional 2023 consultation.

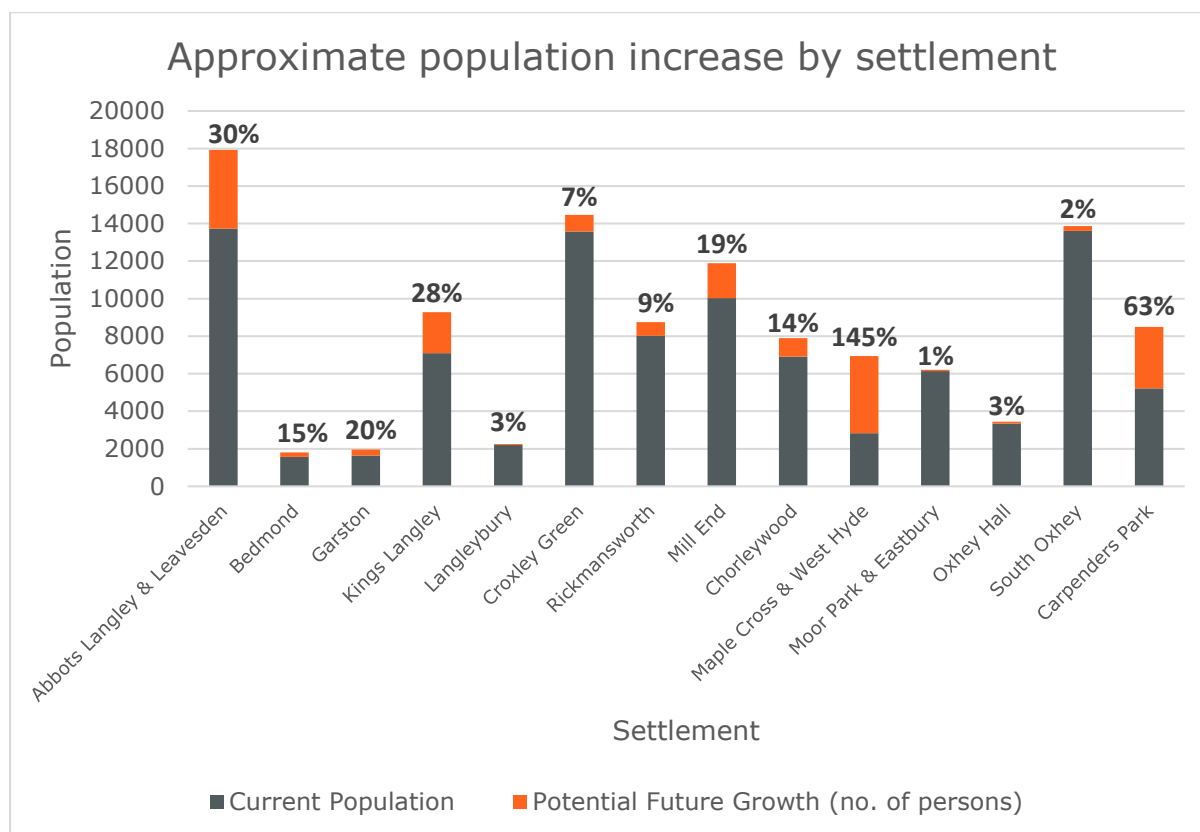
Table 3-2 and Figure 3-1 provide details of the approximate percentage increase to the settlements for which there are proposed housing allocations. The estimates are based on the assumption of there being 2.3 people per new dwelling and are therefore an approximation.

**Table 3-2: Approximate percentage population increase by settlement**

Settlement	Potential Future Growth (indicative no. of dwellings)	Approximate Potential Future Growth (no. of persons)	Current Population	Approximate % Increase in Population at end of plan period
Abbots Langley & Leavesden*	1818	4181	13737	30%
Bedmond	103	237	1575	15%
Garston	144	331	1632	20%
Kings Langley**	951	2187	7904	28%
Langleybury	25	58	2199	3%
Croxley Green	386	888	13579	7%
Rickmansworth	319	734	8012	9%
Mill End	811	1865	10024	19%
Chorleywood	431	991	6905	14%
Maple Cross & West Hyde	1783	4101	2835	145%
Moor Park & Eastbury	35	81	6132	1%
Oxhey Hall	46	106	3347	3%
South Oxhey	110	253	13613	2%
Carpenders Park	1425	3278	5212	63%

\*for the purpose of this 'settlement level effects' assessment, the housing growth associated with Site CFS26c (Land to the west of the Kings Langley Estate) has been 'apportioned' to Kings Langley and not Abbots Langley & Leavesden as was the case in the Local Plan Regulation 18 Part 2 consultation (June 2021) and elsewhere in the accompanying Initial SA Report.

\*\*for Kings Langley the figures are based on the overall population of the settlement and not just the part that is in Three Rivers District. If the 'Three Rivers only' population were to be used it would equate to an approximate 82% increase in population. In addition, as detailed in "\*" above, Site CFS26c has been 'apportioned' to Kings Langley for the purposes of this assessment, given its location adjacent to the existing built area of Kings Langley. For the January 2023 consultation the site at Hunton Bridge (NSS10 Land at Mill Place) has also be apportioned to Kings Langley for the purposes of this assessment.



**Figure 3-1: Approximate percentage population increase by settlement**

As previously reported in the Interim SA Report (2021) it can be seen from Table 3-2 and Figure 3-1 that the settlements which would see the largest percentage increase to their overall populations over the Local Plan period are Maple Cross (145%), followed by Carpenders Park (63% (65% in 2021)). This remains the case.

Taking into consideration the four NSS sites proposed for allocation, along with the amended and reconsidered sites which are now proposed for allocation, Abbots Langley & Leavesden now shows a potential population increase of 31%, compared to 16% shown in the Interim SA Report (June 2021). The other significant change is Rickmansworth, now 9% compared to 30% in June 2021.

## 4 Next steps

The SA will form one source of evidence/assessment that will help to inform the Council in their decisions relating to the policy details and the sites which should be allocated in the Local Plan.

Following the consultation on the Additional Sites for Potential Allocation, accompanied by this SA Working Note, the next output from the SA process will be the production of a further SA Working Note to accompany an additional Regulation 18 Public consultation on "Our vision for Three Rivers - our preferred Local Plan and housing numbers" in September/October 2023 (provisional), at which point strategic options and alternatives will be appraised.



## Appendix A New Site and Amended and Reconsidered Site Assessments

### A.1 Introduction

This appendix includes the assessments of the new sites (NSS sites) which have been put forward following the Regulation 18 consultation and the two amended and reconsidered sites which are now proposed for allocation (CFS8d and CFS26e).

The four NSS sites which are proposed for allocation in the Local Plan are denoted by the symbol “✳”

For consistency with previous SA reports for site assessments the sites are ordered by settlement and not by site number.

### A.2 Housing

#### A.2.1 Abbots Langley & Leavesden

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment	Explanatory Comments
Site Ref: NSS13 Land to the rear of The Shires High Elms Lane	✳	-	-	✓	-	✳	-	?	✳	✓	✓	✓	✓	-	-	<p>✳ Development of this greenfield site which contains TPOs throughout the site and open grassland and woodland would have adverse effects on biodiversity (SA1), would result in the loss of agricultural land (SA6). The site is considered to have a medium-high sensitivity to built development and would extend Abbots Langley into semi-open countryside (SA9).</p> <p>? The development may affect the setting of the two Grade II Listed Buildings to the east of the site (SA8).</p> <p>✓ The site is located in relatively close proximity to services and facilities (SA4 &amp; SA11). The development would provide new open space and play space (SA10 &amp; SA12) and would deliver 130-185 new dwellings (SA13).</p>

<p>Site Ref: NSS14 Margaret House, Abbots Langley *</p>	?	-	-	✓	-	✓	-	?	x	✓	✓	✓	✓	?	?	<p>x The site is considered to have a medium sensitivity to built development (SA9)..</p> <p>? The site is adjacent to the Abbots Langley Churchyard Local Wildlife Site (SA1).The site is within an area of archaeological interest and the Abbots Langley Conservation Area which includes the Grade I Listed Building (Church of St Lawrence the Martyr) to the south of the site and several Grade II and Locally Listed Buildings to the south of the site (SA8). The site was formerly in use as a residential care home, so there is some uncertainty as how the loss of this could affect the local economy and jobs (SA14 &amp; SA15).</p> <p>✓ The site is located in close proximity to services and facilities including a bus stop (SA4 &amp; SA11), although it is some distance from a railway station. The site is on previously developed land (SA6). The development would provide new open space and play space (SA10 &amp; SA12) and deliver approximately 25 net new dwellings (SA13).</p>
<p>Site Ref: CFS8d Notley Farm (combined sites) (Amended and reconsidered site)</p>	x	-	-	✓	-	x	-	?	x	?	✓	✓	✓	-	-	<p>x This site is made up of greenfield land which has TPOs along the boundary, veteran trees and an ancient tree within the site (SA1). The land is currently in use for agriculture (SA6). Development here would extend Abbots Langley into open countryside (SA9).</p> <p>? The site is close to Abbots Langley Conservation Area and two Grade II Listed Buildings (SA8). Development would disrupt the public right of way which runs across the centre of the site (SA10).</p> <p>✓ The site is in close proximity to most local facilities and services and is close to a bus stop, though is at a distance from any railway station (SA4 &amp; SA11). The development would provide considerable new open space and play space (SA10 &amp; SA12) and would deliver 450 new dwellings (SA13).</p>
<p>Site Ref CFS26e The Kings Langley Estate, Abbots Langley (Amended and reconsidered site)</p>	x	-	-	✓	?	x	-	?	x	?	✓	✓	✓	-	-	<p>x Development of this greenfield site, which contains an area of woodland covered by a TPO, would have adverse effects on biodiversity (SA1), would result in loss of agricultural land (SA6) and would extend Abbots Langley into open countryside in an area with medium-high sensitivity to built development (SA9).</p> <p>? The site is in close proximity to the M25 which could result in air quality and noise issues for residents of new housing (SA10). The site is in close proximity Grade II Listed Buildings (SA8).</p> <p>✓ The site is in close proximity to local facilities and services, though is at some distance from a bus stop (SA4 &amp; SA11). Development of the site would provide considerable new open space as well as play space (SA10) and a new primary school (SA12). Development of the site would deliver 380 new dwellings (SA13).</p>

**A.2.2 Bedmond**

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment	Explanatory Comments
Site Ref: NSS2 56 High Street, Bedmond *	?	-	?	✓	-	✓	-	?	?	?	✓	?	✓	x	x	<p><b>x</b> Development of this site would result in the loss of employment floorspace and associated job opportunities (SA14 &amp; SA15).</p> <p><b>?</b> There are TPOs along the south of the site (SA1). To the south of the site, there is an area at risk of surface water flooding (SA3). Development may affect the setting of two Grade II Listed Buildings adjacent to the site (SA8). Redevelopment of the site, which is considered to have a medium-low sensitivity to built development, may improve the local village-scape (SA9). There is the possible provision of local shops and community uses (dentist or health centre) (SA10 &amp; SA12).</p> <p><b>✓</b> The site is located in close proximity to local services and facilities as well as a bus stop, though is at a distance from a railway station (SA4 &amp; SA11) and is relatively close to open space and play space (SA10). The site is previously developed land (SA6). The development would deliver 20 new dwellings (SA13).</p>
Site Ref: NSS3 Land Between Bell Lane and Millhouse Lane, Bedmond	x	-	-	✓	-	x	-	-	x	?	✓	-	✓	-	-	<p><b>x</b> Development of this greenfield woodland site which is covered by a TPO would have adverse effects on biodiversity (SA1). Development would result in the loss of undeveloped land (SA6). The site is considered to have a high sensitivity to built development and development of the site would extend Bedmond into open countryside (SA9).</p> <p><b>?</b> The north-east of the site is designated as a Historic Landfill site and development could provide an opportunity for remediation of any contamination (SA6). Development may disrupt access to the public right of way which runs through the site (SA10).</p> <p><b>✓</b> The site is located reasonably close to some local services and facilities including a bus stop, though is at a distance from a railway station (SA4 &amp; SA11) and is relatively close to open space and play space (SA10). The site would deliver 12-18 new dwellings (SA13).</p>

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment	Explanatory Comments
Site Ref: NSS6 North Cott, East Lane, Bedmond *	x	-	-	✓	?	x	-	?	-	?	✓	✓	✓	-	-	<p>x The site is made up of grassland with some biodiversity value (SA1) and is currently used as agricultural land (SA6).</p> <p>? There are a number of Grade II and Locally Listed Buildings nearby to the site and the site may contain heritage assets of archaeological interest (SA8). The site is in close proximity to the M25 which could result in air quality and noise issues for residents of the new housing (SA5 &amp; SA10).</p> <p>✓ The site is within reasonable proximity of facilities and services including a bus stop, though is at a distance to a railway station (SA4 &amp; SA11). The development is close to open space and play space and may provide additional open space / play space (SA10 &amp; SA12) and would deliver 12 new dwellings (SA13).</p> <p>† The Landscape Sensitivity Assessment classifies Site PCS25, which is located within the NSS6 site, as having low sensitivity to built development.</p>
Site Ref: NSS12 Land between Bell Lane and Millhouse Lane	x	-	-	✓	-	x	-	-	x	?	✓	-	✓	-	-	<p>x Development of this greenfield woodland site which is covered by a TPO would have adverse effects on biodiversity (SA1). Development would result in the loss of undeveloped land (SA6). The site is considered to have a high sensitivity to built development and development of the site would extend Bedmond into open countryside (SA9).</p> <p>? Development may disrupt access to the public right of way which runs through the site (SA10).</p> <p>✓ The site is located reasonably close to some local services and facilities including a bus stop, though is at a distance from a railway station (SA4 &amp; SA11) and is relatively close to open space and play space (SA10). The site would deliver 11-16 new dwellings (SA13).</p>
Site Ref: NSS15 Land adj. Newlands Park	x	-	-	x	-	x	-	-	-	x	x	-	✓	-	-	<p>x The site is made up of greenfield land with some biodiversity value (SA1) and there would be a loss of undeveloped land (SA6). The site is at some distance from open space and play space (SA10) as well as most local facilities and services (SA4 &amp; SA11).</p> <p>✓ The development would deliver 6-9 new dwellings (SA13).</p>

### A.2.3 Garston

No NSS sites

### A.2.4 Kings Langley

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment	Explanatory Comments
Site Ref: NSS8 Land at Hilltop Farm, Kings Langley	x	-	-	x	-	x	-	-	?	✓	x	✓	✓	-	-	<p><b>x</b> Development of this greenfield site, which has some tree cover, would have adverse effects on biodiversity (SA1). Development would result in the loss of agricultural land (SA6) and affect local landscape (SA9). The site is located at a distance from services and facilities, has infrequent public transport provision and is at a distance from a railway station (SA4 &amp; SA11).</p> <p><b>?</b> The site is considered to have a medium-low sensitivity to built development (SA9).</p> <p><b>✓</b> The development would provide new open space and play space (SA10 &amp; SA12). The site would deliver 110-185 new dwellings (SA13).</p>
Site Ref: NSS9 Land adjacent to 235 Toms Lane	x	-	-	✓	-	x	-	-	x	✓	✓	✓	✓	-	-	<p><b>x</b> Development of this greenfield site, which has Local Wildlife Sites to the south (Moor Wood LWS) and east (Bedmond Green LWS), would have adverse effects on biodiversity (SA1) and would result in the loss of agricultural land (SA6). The site is considered to have a high sensitivity to built development and development would extend Bedmond into open countryside and erode the gap with Kings Langley (SA9).</p> <p><b>✓</b> The site is reasonably close to facilities and services, though has infrequent public transport provision and is at a distance from a railway station (SA4 &amp; SA11). Development would provide new open space and play space (SA10 and SA12). Development would deliver 50-83 new dwellings (SA13).</p>

### A.2.5 Langleybury

No NSS sites

**A.2.6 Croxley Green**

No NSS sites

**A.2.7 Rickmansworth**

No NSS sites

**A.2.8 Mill End**

No NSS sites

**A.2.9 Chorleywood**

Page 70

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment	Explanatory Comments
Site Ref: NSS4 Cedar's Village, Chorleywood, WD3 5GL	x	-	-	✓	?	✓	-	?	x	?	✓	-	✓	-	-	<p><b>x</b> Although the site contains a majority of previously developed land, there is some greenfield wooded land with biodiversity value, the site containing the Chorleywood College Local Wildlife Site and being adjacent to the Chorleywood Common LWS. In addition there are a number of TPOs on site (SA1). The site is considered to have a high sensitivity to built development and is within 300m of the Chilterns AONB (SA9).</p> <p><b>?</b> The site is in very close proximity to the M25 which could result in air quality and noise issues for residents of the new housing (SA5 &amp; SA10). Development may disrupt the setting of the Grade II Listed Buildings within and close to the site, as well as Chorleywood Conservation Area (SA8).</p> <p><b>✓</b> The majority of the site is classified as previously developed land (SA6). The site is in relatively close proximity to local facilities and services, including a railway station (SA4 and SA11). The site is in close proximity to open space (SA10), and would deliver additional retirement and care housing (SA13).</p>

**A.2.10 Maple Cross & West Hyde**

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment	Explanatory Comments
Site Ref: NSS1 1 Denham Way, Maple Cross (Employment use)	x	?	-	✓	-	x	-	-	?	-	✓	✓	-	✓	✓	<p><b>x</b> Development of this mainly greenfield site would have adverse effects on biodiversity (SA1) and result in the loss and sealing of soil (SA6).</p> <p><b>?</b> The site is within GSPZ1 which risks contamination of the ground water source (SA2). The site is considered to have a medium-low sensitivity to built development (SA9).</p> <p><b>✓</b> The site is in a relatively sustainable location for an employment site (SA4 &amp; SA11). The site would deliver new local retail (SA12) new employment floorspace and job opportunities (SA14 &amp; SA15).</p>
Site Ref: NSS1 1 Denham Way, Maple Cross (Residential use)	x	?	-	x	-	x	-	-	?	?	x	-	✓	-	-	<p><b>x</b> Development of this mainly greenfield site would have adverse effects on biodiversity (SA1) and result in the loss and sealing of soil (SA6). Whilst the site is close to some local services it is located at some distance from most services and facilities and is at a distance from a railway station (SA4 &amp; SA11).</p> <p><b>?</b> The site is within GSPZ1 which risks contamination of the ground water source (SA2). The site is considered to have a medium-low sensitivity to built development (SA9). The site is some distance from open space and play space (SA10).</p> <p><b>✓</b> The site would deliver 25 new dwellings (SA13).</p>
Site Ref: NSS5 Clancy Group HQ, Harefield	x	?	?	x	-	✓	-	?	?	✓	x	✓	✓	x	x	<p><b>x</b> The main area of the site is adjacent to the Colne Valley Gravel Pits Local Wildlife Site, with the access road being within the LWS (SA1). The site is at a distance from services and facilities and a railway station, though it has a frequent bus service in relatively close proximity (SA4 &amp; SA11). Loss of some of the existing employment space could have some adverse effects on the local economy and jobs (SA14 &amp; SA15).</p> <p><b>?</b> The site is within GSPZ1 which risks contamination of the ground water source and is close proximity to River Colne and adjacent water bodies (SA2). Part of the site is in Flood Zone 2 and is adjacent to Flood Zone 3b (SA3). Development may affect the setting of the Coppermill Lock Conservation Area adjacent to the east of the site (SA8). The site is considered to have a medium-low sensitivity to built development (SA9).</p> <p><b>✓</b> The site is comprised of previously developed land (SA6), would provide new open space and play space (SA10 &amp; SA12) and would deliver 26-36 new dwellings (SA13).</p>

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment	Explanatory Comments
Site Ref: NSS16 Sunnyhill Road	?	?	-	x	?	✓	-	-	-	?	x	✓	✓	x	x	<p><b>x</b> Whilst the site is close to a frequent bus service it is located at some distance from services and facilities and is at a distance from a railway station (SA4 &amp; SA11). Development of the site would result in the loss of a commercial enterprise (spa facility) which could have some adverse effects on the local economy and jobs (SA14 &amp; SA15).</p> <p><b>?</b> The site contains TPOs at the north boundary of the site (SA1). The site is within GSPZ1 which risks contamination of the ground water source (SA2). The site's proximity to the north of the HS2 construction depot may have negative impacts on residents' health and wellbeing due to noise and air quality, although this effect may be temporary depending on how long the construction depot is operational (SA5 &amp; SA10).</p> <p><b>✓</b> The majority of the site is comprised of previously developed land (SA6). Development would provide new open space and play space (SA10 &amp; SA12) and the site would deliver 26-37 new dwellings (SA13).</p>

**A.2.11 Moor Park & Eastbury**

No NSS sites

**A.2.12 Oxhey Hall**

No NSS sites

**A.2.13 South Oxhey**

No NSS sites

**A.2.14 Carpenders Park**

No NSS sites





SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment	Explanatory Comments
Site Ref: NSS11b Land at Sarratt, New Road, Sarratt. Parcel 2.	x	-	-	x	-	x	-	?	x	?	x	-	✓	-	-	<p><b>x</b> Development of the greenfield site would have adverse effects on biodiversity (SA1) and would result in the loss of agricultural land (SA6). The site is considered to have a medium-high sensitivity to built development and development may disrupt the setting of the Chilterns AONB to which it is adjacent (across New Road) (SA9). Whilst the site is close to some limited local facilities and services it is at a distance from main facilities and services, including a railway station, and has poor public transport provision (SA4 &amp; SA11).</p> <p><b>?</b> Development may affect the setting of Sarratt (The Green) Conservation Area which is located approximately 150m to the south of the site (SA8). The site is some distance from open space and play space (SA10).</p> <p><b>✓</b> The development would deliver 11-14 new dwellings (SA13).</p>

**A.2.16 Belsize**

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment	Explanatory Comments
Site Ref: NSS17 The Puffing Field Windmill Hill Chipperfield	x	-	?	x	-	x	-	?	?	?	x	-	✓	-	-	<p><b>x</b> The majority of the site is greenfield and covered with woodland (SA1 and SA6). The site is located at some distance from any facilities and services and a railway station, though has reasonable access to a bus service (SA4 &amp; SA11).</p> <p><b>?</b> A small area in the centre of the site is at a high risk of surface water flooding (SA3). The site is close to a Grade II Listed Building and may contain heritage assets of archaeological interest (SA8). The site is considered to have a medium-low sensitivity to built development (SA9). The site is a considerable distance from any open space and play space and could affect users of the public right of way that runs along the west boundary of the site (SA10).</p> <p><b>✓</b> The site would deliver 4-8 new dwellings (SA13).</p>

**A.2.17 Hunton Bridge**

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment	Explanatory Comments
Site Ref: NSS10 Land at Mill Place, Watford Road *	?	?	-	x	?	✓	-	?	-	?	x	-	✓	x	x	<p><b>x</b> Whilst the site is located within relative close proximity of a local shop it is at a distance from most services and facilities, including a railway station (SA4 &amp; SA11). Development would result in the loss of some commercial 'floorspace' (SA14 and SA15).</p> <p><b>?</b> The site is located adjacent to the Grand Union Canal / River Gade Local Wildlife Site (SA1). The site is adjacent to the River Gade/Grand Union Canal (SA2). The sites is close to Grade II Listed Buildings (Bridge over the Grand Union Canal to the south and North Grove Lock House to the north) (SA8). The site is adjacent to the A41 which could result in air quality and noise issues for residents of the new housing. The site is some distance from open space and play space (SA5 &amp; SA10).</p> <p><b>✓</b> The site is previously developed land (SA6) and would deliver 20 new dwellings (SA13).</p>



Three Rivers District  
Local Plan Regulation 18  
Preferred Policy Options and Sites for  
Potential Allocation

Interim Sustainability Appraisal Report  
June 2021

## Report details

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Eilis Garvey	Joint-Author	Rob Gardner	Joint-Author and Technical Reviewer

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## Table of Contents

1	Introduction	1
1.1	Background	1
1.2	Purpose of the Interim SA Report	1
1.3	Structure of the Interim SA Report	2
1.4	The SA Process	2
1.5	Habitats Regulations Assessment	7
2	The Local Plan	8
2.1	Introduction	8
2.2	Local Plan Preferred Policy Options (Part 1)	8
2.3	Local Plan Sites for Potential Allocation (Part 2)	10
3	Approach to the SA	12
3.1	Introduction	12
3.2	Methodology	12
3.3	Consultation	14
4	Sustainability Context and SA Framework	15
4.1	Introduction	15
4.2	Policy Context and Baseline Review	15
4.3	Identifying Environmental and Sustainability Issues	16
4.4	SA Framework	20
4.5	Inter-relationships between SA Objectives	21
4.6	Compatibility between SA Objectives and Local Plan Vision and Objectives	23
5	Consideration of Options	26
5.1	Introduction	26
5.2	Local Plan Strategy and Policy Options	27
5.3	Site Allocation Options	28
6	Assessment of Regulation 18 Local Plan	30
6.1	Introduction	30
6.2	Summary of the Assessment of Regulation 18 Local Plan Part 1	30
6.3	Summary of the Assessment of Regulation 18 Local Plan Part 2	36
6.4	Whole Plan Assessment by SA Topic	50
6.5	Cross-boundary effects	58
6.6	Difficulties Encountered in Undertaking the Assessment	58

---

6.7	Mitigation and Recommendations	58
6.8	Monitoring	61
6.9	How the SA has influenced the Plan	62
7	Conclusions and Next Steps	63
7.1	Conclusions and Recommendations	63
7.2	Next Steps	63
	Abbreviations used	64

### Appendices

Appendix A – SA Framework

Appendix B – Consultation Responses

Appendix C – Sustainability Baseline and Context

Appendix D – Alternatives Considered

Appendix E – Assessment of Regulation 18 Local Plan (Part 1)

Appendix F – Assessment of Regulation 18 Local Plan (Part 2)

Appendix G – Assessments of Sites Not Taken Forward



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# 1 Introduction

## 1.1 Background

Three Rivers District Council (TRDC) are preparing a single Local Plan which will replace the Core Strategy (adopted on 17th October 2011), the Development Management Policies Local Development Document (adopted on 26th July 2013) and the Site Allocations Local Development Document (adopted on 25th November 2014). The Core Strategy was developed and adopted prior to the introduction of the National Planning Policy Framework (NPPF) and the update will therefore need to take account of the new policy landscape introduced by the NPPF in March 2012 and subsequently updated in 2018.

The new Local Plan will incorporate strategic policies, development management policies and site allocations into a single document.

During its preparation this Local Plan must be subject to both Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) under the 'Planning and Compulsory Purchase Act' (2004) and 'The Environmental Assessment of Plans and Programmes Regulations' (2004)<sup>1</sup> respectively. Independent consultants TRL Ltd have been appointed by Three Rivers District Council to undertake SA and Strategic Environmental Assessment SEA in support of the new Local Plan.

Both the SA and the SEA processes help planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans through a structured assessment of the Plan against key sustainability issues. Hereinafter in this report this combined process will be referred to as 'SA'.

Independent consultants TRL Ltd have been appointed by the Council to undertake Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) in support of the new Local Plan.

This Interim Sustainability Appraisal Report has been produced to accompany the Regulation 18 Local Plan Consultation in order to provide an assessment of the likely environmental, social and economic effects of the various options being considered.

## 1.2 Purpose of the Interim SA Report

This Interim Sustainability Appraisal Report has been produced in order to provide an assessment of the environmental, social and economic effects that would be likely to result from the implementation of strategies, policies and sites included in the Local Plan Regulation 18 Preferred Policy Options and Sites for Potential Allocation, along with the consideration of wider cumulative effects associated with the Plan as a whole.

The report also provides information on the range of options which have been considered during the development of the Local Plan to the Regulation 18 stage, through the development leading up to the Issues and Options consultation in summer 2017 and then subsequently up to this second Regulation 18 stage<sup>2</sup>.

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<sup>1</sup> This regulation implements European Directive 2001/42/EC, known as the Strategic Environmental Assessment (SEA) Directive

<sup>2</sup> Regulation 18 of the Local Plan Regulations (England) 2004 (As Amended)

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The Interim Sustainability Report builds on the SA work previously undertaken through the consultation on a Scoping Report in May 2017, and subsequent update, and through the SA of the Local Plan Issues and Options (July 2017).

### 1.3 Structure of the Interim SA Report

This Interim SA Report is structured as follows:

- Section 1 provides an introduction to the SA process and to this report and describes how the SA meets regulatory requirements. It also provides a brief summary of the Habitats Regulations Assessment (HRA) process;
- Section 2 provides an outline of the contents and main objectives of the Local Plan;
- Section 3 provides details on the scope and approach to the SA, including the methodology and details of consultation undertaken to date;
- Section 4 provides information relating to the scoping stage and provides a summary of the key sustainability issues based on the baseline research and the framework of SA objectives that are proposed for the assessment stage of the SA. It also includes analysis of the compatibility between the SA objectives and the Local Plan objectives;
- Section 5 provides details the different stages that have been undertaken during the development of the Local Plan and the accompanying SA and describes how options/alternatives have been considered when developing the Regulation 18 Local Plan;
- Section 6 provides details of the findings of the assessment of the Regulation 18 Local Plan;
- Section 7 provides a brief conclusion and details on the next steps for the SA.

Appendices are contained within a separate volume, as follows:

- Appendix A: provides details of the SA related consultation responses received to date;
- Appendix B: provides an update to the information provided in the 2017 Scoping Report;
- Appendix C: provides the full Sustainability Appraisal Framework;
- Appendix D: provides details on the assessment of options/alternatives;
- Appendix E: provides the detailed findings of the SA assessment process for the Proposed Policy Options in the Regulation 18 Local Plan;
- Appendix F: provides details of the assessments for sites proposed for allocation in the Regulation 18 Local Plan;
- Appendix G: provides details of the assessments for sites not to be taken forward for allocation in the Regulation 18 Local Plan.
- A Non-Technical Summary (NTS) has also been prepared as a separate document.

### 1.4 The SA Process

The process for undertaking the SA for Local Plans is summarised in Figure 1-1, with Table 1-1 providing the details as to how this process has been, and will be, undertaken in relation to the Three Rivers Local Plan.

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### 1.4.1 *Stage A – Scoping*

During Stage A of the process a scoping exercise was undertaken in order to identify the key issues and opportunities within the District, which can then inform the development of the new Local Plan, and to develop the SA methodology for undertaking the assessment of the Plan. A Scoping Report was then prepared and published for consultation from 12th May to 16th June 2017.

The Scoping Report provided information relating to the current Environmental and Sustainability Context for the District as well as providing an indication of the likely evolution of the baseline without the Plan. From the issues identified a draft framework of SA Objectives was prepared. The purpose of the SA Framework is to provide a way in which the effects of the Plan can be described, analysed, and compared. The SA Framework, which was originally developed in 2006, formed the ‘starting point’ for the SA Framework for the new Local Plan

Following the consultation, the Scoping Report was updated to take on-board comments received. The Scoping Report Update (July 2017) provided a summary of the consultation responses received along with an explanation of how each comment had been taken into account.

Given the length of time between the Scoping Report Update and the production of this Interim SA Report it has been necessary to provide further updates to the scoping information. This update is provided as Appendix B to this report.

### 1.4.2 *Stage B – Developing and refining alternatives and assessing effects*

Stage B of the SA process involves feeding in to the development of the Local Plan during the Regulation 18 stage, through the consideration and assessment of Local Plan options and finally preparing an SA Report for the Regulation 19 consultation (see Section 1.4.3).

The development and refinement of options, and the evaluation of their likely effects is a process which can have more than one iteration, and this has been the case for the development of the Three Rivers Local Plan – as described below.

#### 1.4.2.1 *Issues and Options July 2017*

An SA Working Note was prepared to accompany the Regulation 18 consultation on the Local Plan Issues and Options document in July 2017. That Working Note provided the following information relating to the SA of the Issues and Options:

- A compatibility assessment of the proposed Vision and Objectives for the Local Plan against the SA Objectives;
- An assessment against each of the SA Objectives for the options identified by the Council covering the topics of: Housing Need; Housing Distribution; Affordable Housing; Employment; Transport; and Sustainability and Climate Change.

Further details are provided in Section 5.2.1.

#### 1.4.2.2 *Call for Sites Consultation October 2018*

In autumn 2018 Three Rivers DC undertook a consultation on Potential Sites for Development. This was supported by an SA Working Note which provided an assessment for each of the sites being considered.

Further details are provided in Section 5.3.2.

#### 1.4.2.3 *Preferred Policy Options and Sites for Potential Allocation June 2021 (this stage)*

Since the Issues and Options consultation the Council have been undertaking further development of the Local Plan, including that for the Local Plan strategy, policies and potential site allocations. This new round of planning has taken into consideration; views arising from previous public consultation; National planning policy requirements and other plans and strategies affecting the area, as well as the Government's principles of sustainable development; the long-term priorities for Three Rivers as defined by local people and main service providers in the area; and information provided by research and technical studies (the Evidence Base) that the Council has compiled in order to understand the needs of the area and opportunities and constraints that exist.

This process has involved the rigorous testing of options and alternatives primarily through the sustainability appraisal process, taking into account environmental, social and economic impacts of choices.

A second Regulation 18 consultation is being undertaken to provide an opportunity for the local community, other stakeholders and developers to provide feedback on the emerging approach Local Plan before the Publication of the Local Plan at the Regulation 19 stage.

This Interim SA Report has been prepared to accompany this new stage of consultation. It provides an assessment of the likely effects of implementing the Preferred Policy Options and Sites for Potential Allocation as well as providing information on the options which have been considered during this latest round of plan making.

#### 1.4.3 *Stage C – Preparing the SA Report (a future stage)*

The SA Report will be prepared alongside the preparation and publication of the Pre-Submission Local Plan at the Regulation 19 stage. This is currently planned for November/December 2021. The SA Report will fully meet the requirements of Schedule 2 of the SEA Regulations – which relates to the requirements for what must be included in an Environmental Report.

#### 1.4.4 *Stage D – Consultation and Examination (a future stage)*

Following the Pre-Submission consultation the Local Plan will be submitted to the Secretary of State for Examination. If necessary an SA Report Addendum will be produced to reflect any minor changes to the Plan. The Submission is planned for August/September 2022 with Examination anticipated in Late 2022/Early 2023.

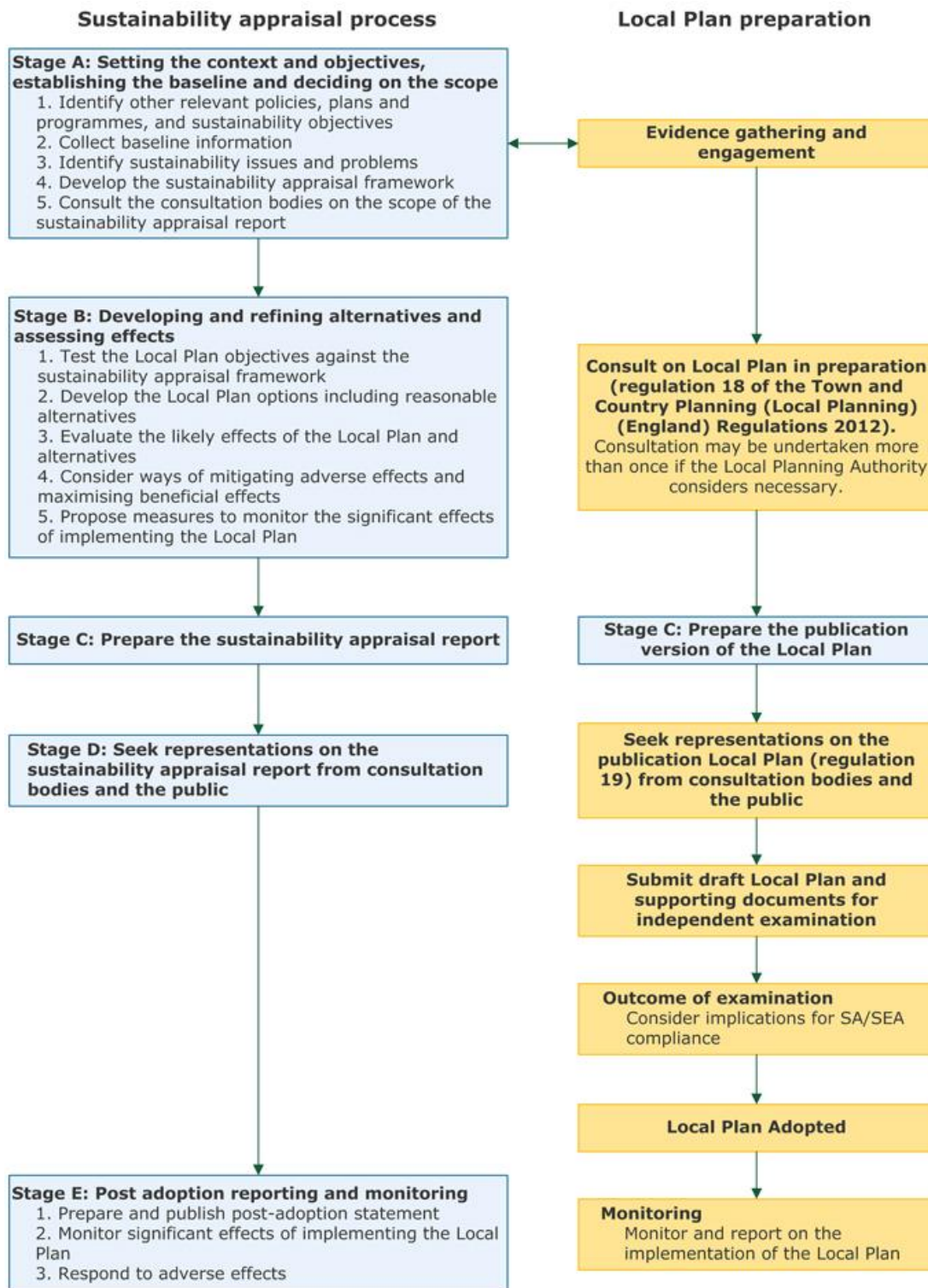
#### 1.4.5 *Stage E – Adoption (a future stage)*

When the Local Plan is adopted (anticipated for Summer 2023) it will be accompanied by an SA Adoption Statement. In line with the SEA Regulations, the SA Adoption Statement will provide the following information:

- How environmental considerations have been integrated into the plan;
- How the SA Report has been taken into account;
- How opinions expressed in relation to the consultations on the Local Plan and SA Report have been taken into account;
- The reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and
- The measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

**Figure 1-1: Relationships between Local Plan preparation and SA processes**

(Source: Planning Practice Guidance, 2016)



The key stages of the SA and Local Plan preparation processes are summarised in Table 1-1.

**Table 1-1: Stages in the SA and Three Rivers Local Plan**

Local Plan	SA Stages	SA documents/outputs and Dates
Begin document preparation	<p>Stage A: Setting the context, establishing the baseline and deciding on the scope.</p> <p>A1: Identify other relevant policies, plans and document programmes, and sustainability objectives.</p> <p>A2: Collecting baseline information.</p> <p>A3: Identifying sustainability issues and problems.</p> <p>A4: Developing the SA framework.</p> <p>A5: Consulting on the scope of the SA (<b>Scoping Report</b>).</p>	<p>SA Scoping Report, prepared May 2017.</p> <p>Consultation on Scoping Report, May-June 2017.</p> <p>SA Scoping Report Update, July 2017.</p>
<p>Regulation 18 Local Plan Issues and Options consultation. July 2017.</p> <p>Ongoing development of New Local Plan</p> <p>Consultation on the Local Plan 'Potential Sites for Consultation', October 2018.</p> <p>Consultation on Regulation 18 Local Plan, November 2020.</p>	<p>Stage B: Developing and refining options and assessing of effects.</p> <p>B1: Testing the Local Plan objectives against the SA framework.</p> <p>B2: Developing the Local Plan options including reasonable alternatives.</p> <p>B3: Evaluate the likely effects of the Local Plan and alternatives.</p> <p>B4: Considering ways of mitigating adverse effects and maximising beneficial effects.</p> <p>B5: Proposing measures to monitor the significant effects of implementing the Local Plan.</p>	<p>Preparation of SA Working Note on Issues &amp; Options<sup>1</sup>, July 2017.</p> <p>Preparation of SA Working Note on Potential Sites for Consultation, October 2018.</p> <p>Update to SA Working Note on Potential Sites for Consultation, July 2019.</p> <p>Preparation of Interim SA Working Report for Regulation 18 Local Plan, June 2021 (<b>this report</b>).</p> <p>Consultation on Regulation 18 Local Plan and accompanying Interim SA Report, June 2021.</p>
Regulation 19 of Publication Local Plan (planned for Nov/Dec 2021)	<p>Stage C: Preparing the Sustainability Appraisal Report.</p> <p>C1: Preparing the <b>SA Report</b>.</p>	<b>SA Report</b> (planned for Nov/Dec 2021)
Submission of Local Plan to Secretary of State (planned for Aug/Sept 2022)	<p>Stage D: Seek representations on the SA Report from consultation bodies and the public</p>	
Examination (planned for late 2022/early 2023)	<p>Consultation on any major modifications arising from the Examination (if required)</p>	
Adoption of the Local Plan (planned for summer 2023)	<p>Stage E: Post adoption reporting and monitoring</p> <p>E1: Prepare and publish <b>post-adoption statement</b></p> <p>E2: Monitor significant effects of implementing the Local Plan.</p> <p>E2: Responding to adverse effects.</p>	To be completed when the Local Plan is adopted.

<sup>1</sup> This output is not required by the SEA Regulations but was produced to assist in selecting the preferred options.

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## 1.5 Habitats Regulations Assessment

The Council is required by legislation to undertake a Habitats Regulations Assessment (HRA) on the Local Plan, in order to determine whether there may be 'likely significant effects' on European Sites of importance for nature conservation from the Local Plan, either alone or in combination with other plans or projects.

Within Three Rivers there are no European Sites, however the HRA needs to also consider the potential for effects on European sites in neighbouring areas, the closest such site being the Burnham Beeches Special Area for Conservation (SAC), which lies within 8km of the District.

Whilst the HRA for the previous plan did not identify any significant issues for European sites, for this new round of Local Plan development a new HRA will need to be undertaken in order to determine whether this remains the case. The new HRA will be informed by the previous HRA undertaken for the Core Strategy.

The HRA will be undertaken as a separate process to the SA, and reported separately. However there are links between the two assessments and one will inform the other.

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## 2 The Local Plan

### 2.1 Introduction

The Preferred Policy Options and Sites for Potential Allocation sets out the planning policies and proposals for accommodating growth across Three Rivers for the period 2018 - 2038, the level of growth being significantly higher than that under the current Core Strategy.

The Regulation 18 Local Plan contains a range of 'component parts' which are outlined in the following sub-sections.

### 2.2 Local Plan Preferred Policy Options (Part 1)

The contents of the Regulation 18 Local Plan Part 1 are summarised below.

#### 2.2.1 *Local Plan Vision and Objectives*

As part of the new Local Plan process, Three Rivers District Council has drafted a new Vision and Objectives for the new Local Plan. The Vision forms the critical starting point for the new Local Plan. It encompasses the aims and aspirations for the District up to the end of the plan period, whilst the strategic objectives set out how the Vision should be achieved.

The draft Vision and Objectives of the emerging Local Plan have been informed by the existing Core Strategy and existing/emerging evidence from various studies and high level strategies. The Vision and Objectives will be refined as options are developed and feedback is received from consultation representations.

The Vision for Three Rivers and the Strategic Objectives that will need to be achieved, in the context of the Local Plan, in order to deliver the Vision are as follows:

#### **Vision for Three Rivers**

*“Three Rivers will be recognised as a highly desirable, prosperous and outward-looking District where people want, and are able, to live and work.*

*We will endeavour to protect the character of the area, whilst delivering the high quality homes, jobs and infrastructure that will provide access to good services and facilities for all.”*

#### **Strategic Objectives**

- 1. Provide for a range of high quality new homes within the District to meet objectively assessed needs and increase the provision of affordable housing.*
- 2. Secure economic prosperity within the District by providing a network of employment allocations that continues to meet the current and future needs of businesses.*
- 3. Ensure that new development prioritises and makes best use of previously developed brownfield land (PDL)*
- 4. Ensure that necessary infrastructure and services are integrated within new developments where appropriate.*
- 5. Support the viability, vitality and variety of shops and services within the District’s main settlements and villages.*
- 6. Encourage active modes of travel and enable the integration of sustainable transport within new developments.*



7. *Reduce the need to travel by locating development in sustainable and accessible locations.*
8. *To conserve and enhance the historic environment and resist the loss of, or damage to, heritage assets.*
9. *Continue to tackle climate change and reduce the impacts on the environment by encouraging reductions in carbon emissions, waste, pollution, energy and water consumption and promoting the use of renewable energy and sustainable building materials.*
10. *Provide opportunities for leisure, arts, sport and recreational activities within the District.*
11. *Provide a coherent network of Green Infrastructure that will continue to support the natural environment along with human health and wellbeing.*
12. *To conserve and enhance the corridors of the Rivers Chess, Colne and Gade and the Grand Union Canal.*
13. *Promote safety and security as a high priority in the design of new developments, in order to create attractive and safe places in which to live and work.*
14. *Meet the demands of an ageing population whilst ensuring the District remains attractive and accessible to younger people.*
15. *Health and Wellbeing.*

### 2.2.2 ***Sustainable Development***

- Preferred Policy Option 1: Overarching Policy on Sustainable Development
- Preferred Policy Option 2: Housing Mix and Type
- Preferred Policy Option 3: Housing Density
- Preferred Policy Option 4: Affordable Housing
- Preferred Policy Option 5: Provision for Gypsies, Travellers and Travelling Showpeople
- Preferred Policy Option 6: Residential Design and Layout and Accessible and Adaptable Buildings

It should be noted that whilst this section of the Regulation 18 Local Plan does not include specific preferred policy options in relation to the spatial strategy (i.e. distribution of development) or the level of housing growth to be required, these two issues are both discussed in the supporting text of the document (in Section 2 Background and Context). For completeness the SA has provided assessments of these two topic areas, under the following headings:

- 'Potential Housing Distribution'; and
- 'Housing Growth Level'.

### 2.2.3 ***Employment***

- Preferred Policy Option 7: Employment and Economic Development
- Preferred Policy Option 8: Warner Bros. Studios at Leavesden
- Preferred Policy Option 9: Retail and Leisure

### 2.2.4 ***Social and Community Facilities/Health and Wellbeing***

- Preferred Policy Option 10: Social and Community Facilities
- Preferred Policy Option 11: Health and Wellbeing

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### 2.2.5 *Climate Change*

- Preferred Policy Option 12: Carbon Dioxide Emissions and On-site Renewable Energy
- Preferred Policy Option 13: Adapting to Climate Change and Sustainable Construction
- Preferred Policy Option 14: Renewable and Low Carbon Energy Developments
- Preferred Policy Option 15: Flood Risk and Water Resources

### 2.2.6 *Green Belt*

- Preferred Policy Option 16: Green Belt

### 2.2.7 *Environment*

- Preferred Policy Option 17: Ground Conditions, Contamination and Pollution
- Preferred Policy Option 18: Waste Management and Recycling

### 2.2.8 *Green infrastructure*

- Preferred Policy Option 19: Green and Blue Infrastructure
- Preferred Policy Option 20: Landscape Character
- Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping
- Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation

### 2.2.9 *Design and Heritage*

- Preferred Policy Option 23: Local Distinctiveness and Place Shaping
- Preferred Policy Option 24: Advertisements
- Preferred Policy Option 25: Heritage and the Historic Environment

### 2.2.10 *Transport and Connections*

- Preferred Policy Option 26: Sustainable Transport and Travel
- Preferred Policy Option 27: Parking
- Preferred Policy Option 28: Deliveries, Servicing and Construction
- Preferred Policy Option 29: Waterways
- Preferred Policy Option 30: Broadband and Electronic Communications

## 2.3 **Local Plan Sites for Potential Allocation (Part 2)**

Part 2 of the Regulation 18 Local Plan includes sites for potential allocation as well as supporting policies relating to following topics:

- Housing
- Gypsies and Travellers & Travelling Showpeople
- Employment
- Warner Bros. Studios at Leavesden
- Town Centres & Retail
- Open Space

- 
- Education
  - Green Belt
  - Langleybury & The Grove
  - Maple Lodge Wastewater Treatment Works

## 3 Approach to the SA

### 3.1 Introduction

This Interim SA Report has been produced to accompany the Preferred Policy Options and Sites for Potential Allocation during the Regulation 18 stage consultation. There is no formal requirement to prepare an SA Report at this stage, however it is common practice to do so as it provides stakeholders with information on how the Preferred Policy Options and Sites for Potential Allocation is predicted to perform in terms of sustainability, as well as providing an opportunity for stakeholders to input into the ongoing SA process prior to the production of the full SA Report at the Regulation 19 stage.

### 3.2 Methodology

The methodology used to undertake the assessments for the new Local Plan is generally consistent with that used in the SA for the Core Strategy, Development Management Policies DPD, Site Allocations LDD and Gypsy and Travellers LDD<sup>3</sup>, with some minor amendments to improve the efficiency and effectiveness of the process.

The criteria which have been considered during the assessment process are outlined below.

#### 3.2.1 *Geographic and temporal scope*

The spatial scope for the assessment is largely local (Three Rivers District); however, the assessment takes into account potential cross-boundary effects, as well as regional effects (e.g. those relating to water supply). National effects have also been taken into account wherever appropriate. For example, the effect on CO<sub>2</sub> emissions is likely to have both local and national implications as any reduction will contribute to national targets, whereas effects on surface water quality may be most relevant to the regional water bodies as well as local water bodies, depending on presence of any such water features and their existing quality.

Based on the above, the following terms have been used in the assessment to denote the geographical scale of predicted effects.

Scale		
Symbol	Meaning	Comment
L	Local	Within the District
R	Regional	Affecting neighbouring local authorities
N	National	UK or a wider global impact

#### 3.2.2 *Temporal Scope*

In terms of the temporal scope, the SA examines effects across three temporal scales:

- Short term effects: effects expected in the next 1-10 years;

<sup>3</sup> NB: the Gypsy and Traveller DPD was not taken to the Adoption stage

- Medium term effects: effects expected in the next 10-20 years; and
- Long term effects: effects expected in the next 20+ years (after the life of the plan)

Based on the above, the following terms have been used in the assessment to denote the temporal scale of predicted effects.

Symbol	Timescale	
<b>S</b>	In the Short Term	0-10 years
<b>M</b>	In the Medium Term	10-20 years
<b>L</b>	In the Long Term	After life of plan

### 3.2.3 *Permanence of effects*

The assessment of policies, sites and their options also considers whether the effects will be temporary or permanent. These are reported in the assessment as shown below.

Permanence		
Symbol	Meaning	Comment
<b>P</b>	Permanent	E.g. Effects lasting during and beyond the life of the plan
<b>T</b>	Temporary	E.g. Effects during construction

### 3.2.4 *Significance of effects*

The significance of the effects predicted in the assessment are denoted using the symbology shown below.

Significance Assessment	Description
✓✓	The option is likely to have a significant positive effect
✓	The option is likely to have a positive effect which is not significant
?	Uncertain – It is uncertain how or if the option impacts on the SA objective
✓/x	The option is likely to have some positive and some negative effects, none of which are significant
–	Neutral – The option is unlikely to impact on the SA objective
x	The option is likely to have a negative effect which is not significant
xx	The option is likely to have a significant negative effect

### 3.2.5 *Other assessment factors*

The assessment also considers cumulative/synergistic effects, cross-boundary effects and interrelationships between the SA objectives.

Where assumptions have been made these are described in the assessment commentary, as are any uncertainties in the assessments.

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Where relevant, suggested mitigation measures and other recommendations are included in the assessment commentary.

### 3.3 Consultation

#### 3.3.1 *Introduction*

The SEA Regulations require consultation at various stages of the SA process, as indicated in Table 1-1. To date consultation has been undertaken at the stages outlined below.

#### 3.3.2 *Scoping Report – May 2017*

It is a statutory requirement to consult the Environment Agency, Historic England and Natural England on the scope and level of details to be included in the SEA Environmental Report (the SA Report for Three Rivers Local Plan SA). Common practice is to do this through the preparation of a Scoping Report and such a Scoping Report was prepared in May 2017.

It is also best practice to widen out the consultation to include a wide range of stakeholders and therefore key consultees were contacted directly and asked for feedback on the Scoping Report.

Responses were received from Environment Agency, Historic England and Natural England, as well as a range of non-statutory consultees, including: Hertfordshire County Council – Highways; Hertfordshire County Council – Property; Hertfordshire Gardens Trust; and NHS England and Herts Valleys Clinical Commissioning Group.

The representations provided recommendations for additions to the SA Framework Objectives and indicators, as well as identifying issues that should be taken into account in the SA process. Some identified additional policies, plans and programmes which should be taken into account, whilst others provided input relevant to the baseline information and to other evidence base and guidance sources.

The full details of the consultation responses received can be found in Appendix A to this Interim SA Report.

#### 3.3.3 *Issues and Options SA Working Note July 2017*

Consultation on the SA Working Note (July 2017) which was prepared to inform and accompany the Local Plan Issues and Options and Call for Sites consultation was undertaken between 28th July and 8th September 2017.

One response in relation to the SA Working Note was received. This was from Historic England. The details of the response are provided in Appendix A to this Interim SA Report.

#### 3.3.4 *Sites SA Working Note October 2018*

Consultation on the SA Working Note, which was prepared to inform and accompany the Potential Sites for Consultation, took place between 26<sup>th</sup> October and 21<sup>st</sup> September 2017.

Responses were received from Historic England; Oxhey Hall Residents Association; Kings Langley Parish Council; Chorleywood Residents Association; and Herongate Residents Association. The response from Historic England provided general comments relating to the appraisal process, as well as site specific comments. The comments from the other respondents were in relation to the assessments for specific sites.

Details of the responses are provided in Appendix A to this Interim SA Report.

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## 4 Sustainability Context and SA Framework

### 4.1 Introduction

This section summarises the findings from the SA scoping stages. The scoping process seeks to ensure that the Sustainability Appraisal encompasses the key sustainability issues relevant to the District in the context of the Local Plan. This section provides the environmental and sustainability context by:

- Examining the relationship of the Local Plan with other policies, plans and programmes, to identify all relevant environmental protection objectives and to identify potential conflicts to be addressed within the plan-making process;
- Assembling baseline data on the current and future state of the District for the environment and sustainability topics which may be affected by the Local Plan;
- Identifying the key sustainability issues and opportunities which need to be taken into account in the SA; and
- Presenting the SA Framework of Objectives which have been developed to reflect the findings of the three points above and which are used to structure the assessment process.

### 4.2 Policy Context and Baseline Review

#### 4.2.1 *Policy Context*

The SA process requires authorities to review the requirements of policies, plans and programmes (PPPs) relevant to the content of the Plan to outline:

- The relationship of the Development Plan (Local Plan) with other relevant plans and programmes; and
- The environmental protection objectives - established at international, community or Member State level - relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.

To fulfil this requirement, a review of the relevant plans, policies and programmes has been carried out to identify environmental objectives which may provide constraints or synergies with the plan being formulated. The review was undertaken on SA topic by topic basis, with the findings being presented in the update to the Scoping Report information which is included in Appendix B to this report.

#### 4.2.2 *Baseline review*

In order to assess how the Local Plan will contribute to sustainable development, it is essential to understand the present economic, environmental and social baseline of the District, and to predict how they may progress without implementation of the Plan. Therefore, a key step in the SA process is establishing the current state of the environment and its likely evolution in the future. This process assists in the identification of sustainability and environmental issues/opportunities in the District. It is also important to consider the implications of the Local Plan in its wider context. Baseline data is required to establish the present state of the District and its surrounding area and will be used subsequently for comparative purposes when monitoring and evaluating the Local Plan.

A practical approach is generally taken to data collection bearing in mind data availability and trend analysis, following which the actual data and gaps in information to consider in the future are reported

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at the scoping stage. This reporting also takes into account uncertainties in the data. A Scoping Report was prepared in May 2017 and was updated in July 2017 to take account of responses received during the consultation of the original Scoping Report.

The baseline data in the Scoping Report has been further updated and is presented in Appendix B to this report.

The information has helped to identify the key sustainability issues and opportunities which have been used in the development of the SA Framework of Objectives. Key issues and opportunities are discussed in Section 4.3.

NB: As with the review of other plans, policies and programmes this baseline review does not provide an exhaustive review of information but aims to identify the information most relevant to the SA and Local Plan. Prediction of future trends can be highly uncertain but key trends identified from the available baseline data, and therefore potential sustainability issues have been identified.

### 4.3 Identifying Environmental and Sustainability Issues

The review of plans and programmes affecting the District, and the collation of the baseline data informed the identification of a series of environmental problems or issues that could be addressed by, or affect the strategies, policies and allocations developed in the Local Plan. Such issues, problems and opportunities have been identified through:

- Review of other policies, plans and programmes and the baseline data;
- Response to the Scoping Report consultation and subsequent consultations on SA documents; and
- Additional work on the sustainability appraisal during the post-scoping stages for the new Local Plan.

The issues and opportunities that have been identified during these stages are provided at the end of each of the Topic sections in the Sustainability Context Review in Appendix B and are repeated in Table 4-1.



**Table 4-1: Key sustainability issues and opportunities**

<b>Biodiversity, including flora and fauna, and Geodiversity</b>
<ul style="list-style-type: none"> <li>• Although the SSSIs are considered to be within or close to Natural England PSA targets, they may be under pressure due to the high housing targets the district should fulfil.</li> <li>• Protect and improve existing habitats, including buffer areas, migration routes, stepping stones and landscape features which could potentially be of major importance for wildlife.</li> <li>• Enhance Green Infrastructure at a local level and a strategic level with neighbouring authorities.</li> <li>• Compensate features lost to development where loss is completely unavoidable.</li> <li>• Local Plan to promote the use of management agreements for designated sites, where this can be linked to development.</li> <li>• Minimise fragmentation of wildlife habitats as a result of development.</li> </ul>
<b>Climatic factors</b>
<ul style="list-style-type: none"> <li>• Carbon emissions per capita for Three Rivers are above the regional average and national average; however they were lower in 2014 than they were in 2005.</li> <li>• Greenhouse gas emissions are likely to lead to significant climate changes which could have significant implications for other aspects of quality of life.</li> <li>• The future climate in Hertfordshire is predicted to become warmer, with drier summers and wetter winters.</li> <li>• Increased river and surface water flood risk.</li> <li>• Development proposals could exacerbate flooding elsewhere in catchment and this needs to be avoided by adopting the sequential approach to site selection advocated in the NPPF.</li> <li>• Promote the use and generation of renewable energy and promote energy efficiency.</li> <li>• Implement Sustainable Drainage Systems - porous surfaces, greenspace, wetlands, flood storage areas, urban forestry to help manage some of the effects from climate change.</li> <li>• Opportunity to decrease greenhouse gas emissions through reduced reliance on the private car.</li> </ul>
<b>Air quality</b>
<ul style="list-style-type: none"> <li>• Whilst overall levels of pollutants are low across the District, there is still an area around junction 18 of the M25 where annual mean nitrogen dioxide concentrations are being monitored for exceedances of the relevant Air Quality Objective.</li> <li>• Increased air pollution from a growth in traffic and congestion is likely in the District.</li> <li>• Ensuring that potentially polluting processes incorporate pollution minimisation measures.</li> <li>• Ensuring that potentially polluting developments are not located close to sensitive developments (e.g. care homes, schools etc.) or in areas of existing poor air quality.</li> <li>• Ensuring that sensitive developments are not located in areas of poor air quality.</li> <li>• Promoting the development of Green Travel Plans.</li> <li>• Improving cycle and pedestrian routes and links and cycle parking facilities to encourage the use of non-motorised transport.</li> <li>• Promoting low emission vehicles, such as through the provision of electric vehicle charging infrastructure.</li> <li>• Reducing the need to travel through developing in sustainable locations</li> </ul>
<b>Landscape and Townscape</b>
<ul style="list-style-type: none"> <li>• Three Rivers falls into three Landscape Character Areas: 'Northern Thames Basin', 'Thames Valley' and 'Chilterns'.</li> <li>• Light pollution is rapidly increasing and tranquillity is rapidly decreasing in the East of England. This should be monitored and new lighting should be designed and selected that minimises light pollution.</li> <li>• Recognise the value of all landscapes, not only designated sites and ensure that landscape proposals for development schemes reflect local landscape character.</li> <li>• Ensure that the character, diversity and local distinctiveness of all the landscapes of the District are maintained, enhanced or restored, including the Chilterns AONB.</li> <li>• Preserve, and appropriately manage development within, the Green Belt.</li> <li>• Ensure that access to landscape character areas is socially inclusive.</li> </ul>

<p><b>Historic Environment</b></p> <ul style="list-style-type: none"> <li>• The historic environment, including heritage assets, is under pressure from development and regeneration and associated traffic congestion, air quality and noise pollution. This puts heritage assets at risk of neglect or decay. The threat of infilling and replacement with new buildings and the erosion of historic features in the public realm need to be carefully mitigated and managed.</li> <li>• Recognise the importance of cultural heritage and archaeological features and the importance of regenerating and re-using important buildings, particularly those listed as 'heritage at risk'.</li> <li>• The historic environment can make a significant contribution to the success of development. Opportunities to conserve and enhance the historic environment including designated and non-designated heritage assets and their settings should be sought where possible through sustainable development proposals.</li> <li>• Be proactive in preparing development briefs to renew, restore and redevelop neglected and deteriorating sites of historic character.</li> <li>• Ensure there are strong and robust design standards for new development that respect cultural heritage of the development area.</li> <li>• Access to heritage assets, including buildings, monuments and historic parks and gardens is linked to improved health and wellbeing.</li> <li>• Development may result in significant loss or erosion of the landscape or townscape character or quality, which is likely to also have significant impact (direct and or indirect) upon the historic environment and people's enjoyment of it.</li> </ul>
<p><b>Material Assets</b></p> <ul style="list-style-type: none"> <li>• Waste production and disposal is a growing problem. Production of waste and disposal of this waste is becoming increasingly difficult, with diminishing numbers of suitable sites for landfill disposal. Hertfordshire as a county is having to use sites in Buckinghamshire and Oxfordshire in order to meet its needs. There is however, an increasing move towards ERF facilities rather than landfill.</li> <li>• There is the opportunity to promote the use of renewable resources, protect natural resources and reduce waste.</li> <li>• Supporting a reduction in the amount of waste deposited in landfill.</li> <li>• Supporting alternative methods of waste management, e.g. minimisation and recycling by incorporating facilities within development schemes.</li> <li>• Encouraging re-use and recycling of construction waste in development schemes through the use of planning conditions.</li> <li>• Promoting development on previously developed land and maximise the efficient use of land.</li> <li>• Three Rivers District Council and the other Local Planning Authorities will need to continue to consult with Thames Water about the phasing and planning of future development within the Maple Lodge WWTW catchment area to ensure they can investigate, plan and secure appropriate funding for the construction of any necessary infrastructure.</li> <li>• The District's location in the sand and gravel belt needs to be taken into consideration when planning for new development.</li> </ul>
<p><b>Soils</b></p> <ul style="list-style-type: none"> <li>• Soils in the District are vulnerable to groundwater contamination and erosion of chalk soils. Overland flow is also a main risk in the south. Farmed land here in the north of Three Rivers is vulnerable to pollution run-off and rapid through-flow to streams; with the potential to trigger erosion.</li> <li>• There is the potential for soil loss, compaction and degradation as a result of new development.</li> <li>• Protecting the best and most versatile agricultural land.</li> <li>• Promoting good soil handling practices.</li> <li>• Encouraging development on previously developed land.</li> </ul>
<p><b>Water</b></p> <ul style="list-style-type: none"> <li>• There are some issues with ecological river water quality in Three Rivers.</li> </ul>

- Over abstraction of water resources is an issue in the region. The Chilterns Chalk Streams are particularly susceptible to over abstraction.
- Some areas of Three Rivers are at risk from flooding. The functional flood plans of the Chess Valley and the Colne Valley should be protected.
- There are issues relating to the future capacity of waste water treatment works serving the area.
- Considering overall siting of development schemes in order to minimise potential effects on water quality.
- Taking account of groundwater resources and sensitivities (e.g. source protection zones) when allocating sites for development.
- Encouraging the use of Sustainable Drainage Systems in new developments to minimise negative effects on river quality.

#### Population

- Despite the relatively low levels of deprivation in the District as a whole, there are however small pockets of more deprived areas within Three Rivers, particularly around South Oxhey.
- Take account of an increasing population.
- Take account of an ageing population.
- Tackle issues of deprivation in certain areas of the District.
- Ensure adequate housing, facilities and infrastructure whilst protecting and enhancing the local environment.
- Use planning obligations to help secure an appropriate range of facilities.

#### Health and Wellbeing

- Need to address health inequalities.
- Demand for healthcare in the District is likely to increase as the population increasing, particularly the number of elderly residents.
- Priorities in Three Rivers are to increase levels of physical activity in adults and reduce levels of obesity, to reduce the prevalence of smoking and to help the expanding older population keep healthy.
- Three Rivers' increasing population will lead to additional pressure on secondary healthcare services in the District and also the County as a whole. The increasing proportion of older people in the District's population is also likely to have put pressure on secondary healthcare needs, as they are likely to utilise healthcare services more than others.
- Encourage sustainable transport modes and healthy forms of travel and exercise, e.g. walking/cycling and access to leisure and recreational facilities.
- Encourage the provision of convenience stores that provide fresh produce in accessible locations and explore using planning obligations to help secure an appropriate range of facilities.
- Designing out crime by improving the urban environment. This may be through redevelopment or adding additional security features such as CCTV and improved lighting.
- Developing community activities and facilities that can divert people away from crime, improve tolerance and prevent anti-social behaviour.

#### Housing

- The District's population is changing with growing numbers of elderly residents forecast as a result of increased life expectancy. While this will add to the number of one person households and the population in communal homes, there is also evidence of an increase in the number of young children and more sharing. The past long term trend of declining household size has slowed significantly.
- The price of housing compared to earnings is an issue.
- Meeting needs of Gypsy and Traveller communities even when they no longer choose to travel. Providing a more settled base for Gypsies and Travellers, enables these communities to have better access to key services (health, education and employment).
- Ensuring the provision of a range of housing types to satisfy demand including affordable housing and mixed use developments and a range of housing types of varying sizes.
- Additional growth is likely to increase the pressure on affordable house in the District. This needs to be addressed to ensure the future prosperity of the area.
- Provision of affordable housing in accessible locations.
- Ensuring appropriate housing provision for the elderly and disabled population, e.g. through independent living housing, Life-long homes and appropriate forms of affordable housing.
- Ensuring that such housing is located near to the necessary services and facilities and public transport.

<b>Transport and Accessibility</b>
<ul style="list-style-type: none"> <li>• Pressures due to population growth which leads to increasing levels of traffic, which in turn exacerbates congestion, particularly during peak times.</li> <li>• All the key roads in southwest Hertfordshire are under pressure from heavy levels of traffic, and associated congestion, which has adverse effects on air quality, quality of life and the local economy.</li> <li>• Only 6% of all new residential developments in 2016 were within 30 minutes public transport time of a hospital. Improving bus services to the Watford General Hospital should help to improve access for Three Rivers' residents.</li> <li>• Use planning obligations to secure improvements to public transport.</li> <li>• Providing and maintaining safe and available infrastructure for healthy pursuits – cycle ways, dedicated walkways.</li> <li>• Encourage sustainable transport modes through the requirement for green travel plans in large new developments.</li> <li>• Expansion of Luton Airport could put increased pressure on M25 and M1, motorway junctions and wider road network.</li> <li>• Provision of infrastructure to enable the increased use of sustainable modes of transport (e.g. cycle parking facilities, electric vehicle charging points).</li> <li>• Make developments permeable to provide improved opportunities for walking and cycling.</li> </ul>
<b>Economy, employment and education</b>
<ul style="list-style-type: none"> <li>• Maintaining a strong employment base is essential for the future prosperity of the area.</li> <li>• Providing a range of employment sites, including ones that will be attractive to inward investment.</li> <li>• Providing incubator units and units with shared facilities, e.g. reception and meeting facilities etc. Local Plan to identify suitable locations.</li> <li>• Providing a range of employment sites that will be attractive to knowledge based industries.</li> <li>• Supporting employment opportunities in higher value activities, e.g. knowledge based industries.</li> <li>• Ensuring provision of a range of education facilities. Planning obligations should be used to enhance existing educational facilities, including allocating land for new schools where required. Increasing provision for secondary school places is particularly important as there is a shortage in the District from 2017/18 to 2026/27.</li> <li>• Providing facilities and services to support the improvement of GCSE attainment in schools.</li> </ul>

#### 4.4 SA Framework

Informed by the issues identified, a framework of SA objectives has been developed covering a range of environmental, social and economic topics. It is similar to that used during the SA of the Core Strategy, Development Management Policies DPD and Site Allocations DPD, but with some modifications in order to simplify and to fill some gaps in the previous framework.

The sustainability objectives are quite distinct from the Local Plan objectives. They focus on outcomes, and define the basis for achieving social, economic and environmentally sustainable development. They have been compiled using information from the review of relevant plans and programmes, baseline review and review of key issues.

The purpose of the SA Framework is to provide a way in which the effects of the plan can be described, analysed, and compared. This process involves considering the content of the Local Plan against the identified SA objectives.

The SA Framework contains a high level objective for each topic (see Table 4-2), supported by a set of more detailed sub-objectives (appraisal criteria) for use when assessing Plan policies and considering wider whole-Plan effects. For undertaking the assessment of the individual site allocations and area specific policies a more detailed set of site specific criteria has also been developed. This full SA Framework is presented in Appendix C.

**Table 4-2: SA Framework Objectives**

SA Objective		Abbreviated Reference Term
1	To protect, maintain and enhance biodiversity and geodiversity at all levels	Biodiversity & geodiversity
2	To protect, maintain and enhance water resources (including water quality and quantity)	Water quality/quantity
3	To reduce flood risk	Flood risk
4	Reduce greenhouse gas emissions and adapt to the effects of climate	Climate change
5	Achieve good air quality, especially in urban areas	Air quality
6	Make efficient use of land and protect soils	Soils
7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	Resource efficiency
8	To identify, conserve and enhance the historic environment and heritage assets	Historic environment
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness	Landscape & townscape
10	To improve the health and wellbeing of the local population	Health & wellbeing
11	To develop in sustainable locations	Sustainable locations
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime	Community cohesion
13	Ensure that everyone has access to good quality housing that meets their needs	Housing
14	Achieve sustainable levels of prosperity and economic growth	Sustainable prosperity
15	To ensure local residents have employment opportunities and access to training	Employment & skills

These SA objectives have been and will continue to be used to structure and inform the assessment of the Local Plan through all stages of its development.

#### 4.5 Inter-relationships between SA Objectives

The SA topics cannot be considered in isolation from one another, as there are a variety of inter-relationships that exist. Air quality is a topic which cuts across most of the other SEA topics, with proven links between air quality and human health (respiratory problems). It can also have indirect effects on biodiversity, soil and water quality, and the condition of heritage assets, whilst there is a more direct link between traffic emissions causing poor air quality and the emissions of CO<sub>2</sub>.

The development of sites (residential, employment, retail etc) may show inter-related effects on criteria such as biodiversity, air quality, greenhouse gas emissions, landscape and townscape depending on where they are located, how the development takes shape/is designed, and how it is accessed.

Positive effects can also occur from inter-relationships, for example, protecting landscape quality and/or soil, may lead to habitats and species being indirectly protected, whilst improvements to water quality could result in positive effects for biodiversity.

During the assessment the SA topics (through the SA Objectives) should not be considered in isolation as many inter-relationships exist that need to be taken into account. Some of these relationships are clear cut and easy to understand, for example reduced greenhouse gas emissions and improved air quality which would both result from transport modal shift to sustainable travel modes. Others however can be less obvious, but are equally important and need to be understood when assessing the Local Plan. For example there are inter-relationships between climate change adaptation measures and improvement in human health, from improved safety associated with reducing the risk of properties flooding, through to reduced levels of stress and improved well-being resulting from improvements to energy efficiencies of homes.

Close inter-relationships exist between environmental topics such as air quality, water quality, soil and biodiversity, with improvements or degradation to one often resulting in a similar effect on the other related media/topics. For example increased air pollution can have adverse effects on soil, water quality, and biodiversity through acidification. These effects can then cause issues relating to landscape degradation.

Inter-relationships that will be considered in the SA include the following:

- Air quality influences human health which affects quality of life and also economic activity.
- Local residents and businesses experience air quality at the local level, which affects health and amenity.
- A healthy natural environment improves quality of life. Provides economic benefits through attracting inward investment and increased revenue through tourism.
- Economic growth if undertaken unsustainably could adversely impact upon these assets.
- Greenhouse gas emissions could lead to significant climate change which is likely to affect water resources (supply and demand), alter habitats, affect air quality and public health and increase flood risk. These could all adversely impact upon the District's economy.
- Local topography can influence the levels of walking and cycling and therefore have implications for greenhouse gas emissions, air quality and health and wellbeing.
- The historic environment and cultural heritage contributes to the overall diversity and value of the landscape. It also provides economic benefits and is a source of enjoyment for the population.
- An attractive landscape improves quality of life which in turn could contribute to increase inward investment. Green Infrastructure provides health and wellbeing benefits.
- Noise pollution can both affect tranquillity of landscapes and have adverse effects on health and wellbeing.
- Woodland provides an important role in carbon sequestration.
- Material assets include resources such as land, building materials and other resources which are non-renewable. The topic is concerned with the efficient use of resources, including re-use of brownfield sites and sustainable waste management.
- The quality of the material assets in the District contributes to overall quality of life and can impact upon the region's economy.
- Soil resources are key to sustaining the agricultural economy.
- Climate change is resulting in more extreme weather conditions and will heighten flood risk and demands on water resources.

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- Negative synergy likely for flora and fauna when water bodies with low water flow combined with poor quality water
  - Benefits of improved human health include employment provision and contribution to the local economy, training, research opportunities, reduced burden on social services and public finances.
  - Provision of housing to meet local needs is important both for the wellbeing of communities and also for the local economy.
  - Poor health and well-being will adversely impact upon economic growth in the District.
  - Social considerations and quality of life will impact on employment opportunities and ability to attract inward investment.

#### 4.6 **Compatibility between SA Objectives and Local Plan Vision and Objectives**

A compatibility assessment between the SA objectives and the Local Plan Vision and Objectives (see Section 2.2.1) has been undertaken in order to identify whether there are any incompatibilities or tensions between certain objectives. Where potential incompatibilities are identified these will need to be taken into account when undertaking the assessment process and appropriate mitigation measures or alternative approaches considered in the Local Plan. The results of this assessment are shown in Figure 4-1.

**Figure 4-1: Compatibility between SA Objectives and Local Plan Vision and Objectives**

New Local Plan Vision & Objectives	SA Objectives (abridged)														
	SA1 Biodiversity and geodiversity	SA2 Water quality/quantity	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resource efficiency	SA8 Historic environment	SA9 Landscape and townscape	SA10 Health and wellbeing	SA11 Sustainable locations	SA12 Community cohesion	SA13 Housing	SA14 Sustainable prosperity	SA15 Employment and skills
Vision	?	?	?	?	?	?	?	+	+	+	?	+	+	+	+
1. Homes	?	?	?	?	?	?	?	?	?	+	0	+	+	0	0
2. Employment	?	?	?	?	?	?	?	?	?	0	0	+	0	+	+
3. PDL	+	0	0	0	0	+	0	0	+	0	0	0	0	0	0
4. Infrastructure	?	0	0	0	0	0	0	?	?	0	0	0	0	+	0
5. Shops/Services	0	0	0	0	0	0	0	0	0	+	0	+	0	+	+
6. Sust. Transport	0	0	0	+	+	0	0	0	0	+	0	0	0	0	0
7. Reduce travel	0	0	0	+	+	0	0	0	0	+	+	0	0	0	0
8. Historic Env.	0	0	0	0	0	0	0	+	+	+	0	0	0	0	0
9. Reduce Env. Imp.	+	+	0	+	+	+	+	?	?	+	0	0	0	0	0
10. Leisure/Rec.	?	0	0	0	0	0	0	?	?	+	0	+	0	0	0
11. Green Inf.	+	+	+	+	+	+	0	0	+	+	0	0	0	0	0
12. Blue Inf.	+	+	+	+	+	0	0	0	+	+	0	0	0	0	0
13. Safety/Security	0	0	0	0	0	0	0	0	0	+	0	+	0	0	0
14. Ageing Pop.	0	0	0	0	0	0	0	0	0	+	0	+	0	0	0
15. Health/Wellb'g	0	0	0	0	0	0	0	0	0	+	0	+	0	0	0

Symbol	Compatibility
+	Objectives compatible
0	Objectives not related
-	Objectives incompatible
?	The objective relationship is unknown or is dependent on implementation

The proposed Vision for local planning in Three Rivers District sets a general aspiration for how development in the District will meet the needs of the population whilst at the same time protecting the character of the District. This Vision has therefore been identified as being compatible with the social and economic SA objectives, however there is uncertainty against the environmental SA



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objectives as in order to deliver the new development required to meet the needs there could be impacts on the environment – much will be dependent on the type, scale location and design of the new development and associated infrastructure. For the same reason uncertainties exist between the Local Plan objectives relating to homes and employment.

In general the remaining Local Plan objectives are either compatible with the SA objectives or have no relationship. However there are some additional uncertainties relating to the Local Plan objectives which cover infrastructure, reducing environmental impact and leisure and recreation. These uncertainties have been identified as there could be the potential for new infrastructure, renewable energy schemes and leisure facilities to have some impacts on the historic environment, landscape and townscape and biodiversity.

It should be recognised that whilst some uncertain compatibilities have been identified for specific objectives, there are other objectives that will help to overcome these. For example, where uncertain compatibility has been identified between housing and the historic environment, the Local Plan objective *“8 To conserve and enhance the historic environment and resist the loss of, or damage to, heritage assets”* will help to ensure that adverse effects are minimised.

The Regulation 18 Local Plan includes a series of policies aimed at protecting and enhancing the environment and public realm and helping towards achievement of associated Local Plan objectives. These policies will help towards mitigating the negative effects associated with new development that are identified in the sustainability appraisal for the individual policies and sites.

## 5 Consideration of Options

### 5.1 Introduction

The consideration and appraisal of alternative options is an integral part of the plan making and SA processes. During the development of the Local Plan a range of both strategic and more detailed options have been considered and assessed through the sustainability appraisal process in order to arrive at the Council's proposed approach in the Regulation 18 Local Plan.

The Environmental Assessment of Plans and Programmes Regulations 2004<sup>4</sup> require that the SEA shall:

*"... identify, describe and evaluate the likely significant effects on the environment of -*

*(a) implementing the plan or programme; and*

*(b) reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme."* Article 11 (2).

and that the Environmental Report (the Publication SA Report in the case of the new Three Rivers Local Plan) should include:

*"8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information."* Schedule 2.

The SA Working Notes and SA Reports that are being prepared during the development of the Local Plan provide the findings of the assessments of options that are undertaken during the various stages of the development of the Local Plan and where appropriate provide the reasons for selecting the options taken forward to the next stage of the planning process and the reasons for not taking forward others.

It should be noted that the role of the SA in this process is to provide assessments of the alternatives being considered, not to make the decision as to which alternatives are taken forward or which alternatives should be considered to be 'reasonable alternatives'. This is made clear in Government guidance on SEA<sup>5</sup>:

*"It is not the purpose of the SEA to decide the alternative to be chosen for the plan or programme. This is the role of the decision-makers who have to make choices on the plan or programme to be adopted. The SEA simply provides information on the relative environmental performance of alternatives and can make the decision-making process more transparent".* (Paragraph 5.B.7)

The guidance provides further details on how to consider alternatives as summarised in the following extracts:

#### Identifying alternatives

*"Only reasonable, realistic and relevant alternatives need to be put forward. It is helpful if they are sufficiently distinct to enable meaningful comparisons to be made of the environmental implications of each".*

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<sup>4</sup> Statutory Instrument 2004 No. 1633

<sup>5</sup> A Practical Guide to the Strategic Environmental Assessment Directive. ODPM, 2005

### Assessing alternatives

*“The assessment of alternatives may be made in broad terms against the SEA objectives, provided there is sufficient detail to identify the significant environmental effects of each alternative. Where appropriate any cumulative, secondary and synergistic, short, medium, and long-term effects need to be highlighted, indicating whether they are likely to be permanent or temporary”.*

In developing the Local Plan the Council have considered a range of alternative strategies, policies and potential sites, with the SA feeding into this process. The following sections provide a summary of the different stages at which this has occurred, with further details of the options and the findings of the SA being provided in Appendix D to this report.

## **5.2 Local Plan Strategy and Policy Options**

### **5.2.1 *Issues and Options – July 2017***

In summer 2017 the Council undertook a consultation on their Issues & Options and Call for Sites Consultation Document. This identified some of the issues and challenges facing the District and the possible options that could help to address them.

The Council sought views on the content of the document and how best to balance the delivery of growth across the District, in order to meet the future needs of the community, whilst at the same time protecting the District’s historic and natural environment.

Alongside this consultation, and again in 2018, the Council invited land owners, agents and developers to submit new sites that could be developed to meet future demand for homes and jobs.

A Sustainability Appraisal Working Note was produced in July 2017 to accompany the Issues and Options and Call for Sites Consultation in order to provide an assessment of the likely environmental, social and economic effects of the various options being considered. The findings of the SA at that stage are summarised in Appendix D. The full SA Working Note is available at the following weblink:

<https://www.threerivers.gov.uk/download?id=40507>

Many of the options that were included in the Issues and Options consultation were high level ‘principles’ and none of the options provide any location specifics. This meant that a lot of uncertainty was identified in the assessments.

### **5.2.2 *Further Consideration of Strategy and Policy Options***

In addition to providing summaries of the 2017 Issues and Options assessments, Appendix D provides information on other alternatives which have been considered during the development of the Local Plan to this new Regulation 18 stage.

This is presented for each Preferred Policy Option, with information provided on alternatives which have been considered for each policy (where applicable) along with reasons as to why certain alternatives were rejected and others taken forward.

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## 5.3 Site Allocation Options

### 5.3.1 *Introduction*

Part 2 of the Regulation 18 Local Plan includes sites identified as having potential for allocation for the following land uses: housing, gypsy and traveller and travelling showpeople accommodation, employment (including Leavesden Studios), town centre and retail development, open space and education.

In relation to the housing sites, the Council have considered a wide range of alternatives during the process to select the sites which will be needed to deliver the level of housing growth required to meet the Objectively Assessed Need for the District.

This section provides a summary of the SA work which has been undertaken to support the Council's site allocation process.

### 5.3.2 *Potential Sites for Consultation (October 2018)*

In October 2018 an SA Working Note was prepared to accompany the consultation on the Local Plan 'Potential Sites for Consultation'.

In advance of undertaking the SA of the Potential Sites, the sustainability appraisal provided input into the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) methodology. This was a key early input from the SA process as it ensured that the methodology used by TRDC was aligned with the SA Framework at a level appropriate to the early consideration of site options. It also avoided unnecessary duplication of work between the plan making and SA activities, as the SA has drawn from information in the SHELAA rather than having to unnecessarily undertake separate evidence gathering.

For the SA Working Note (October 2018) an individual assessment was undertaken for each of the Potential Sites which had a separate schedule within the Potential Sites for Consultation document, these being the sites that are capable of accommodating 100 dwellings or more and sites put forward for other uses such as employment and education. For the smaller sites of fewer than 100 dwellings the SA included a single assessment of these sites for each settlement, which identified any key constraints associated with any of the sites.

The SA Working Note is available at the following link:

[www.threerivers.gov.uk/egcl-page/new-local-plan](http://www.threerivers.gov.uk/egcl-page/new-local-plan)

### 5.3.3 *Additional Sites put forward (July 2019)*

Following the consultation on Potential Sites which took place from 26 October - 21 December 2018 a further 29 sites were submitted to the Council for consideration. These sites were assessed using the same methodology as used for the consultation sites and the SA Working Note (October 2018) was been updated (July 2019) to include these new assessments.

The SA Working Note update (July 2019) is available at the following link:

[www.threerivers.gov.uk/egcl-page/new-local-plan](http://www.threerivers.gov.uk/egcl-page/new-local-plan)

### 5.3.4 *Site Assessments 2020*

Further to the SA work described above, in 2020 the SA assessed all sites which were included in the Three Rivers Strategic Housing and Economic Land Availability Assessment (SHELAA) (2020) as well as potential new settlement areas which were identified in the Edge of Settlement and New Settlement

Scoping Report (2020). The sites have been identified from various different sources, resulting in eleven 'site categories'. The categories and an explanation of how the sites within each category were identified are noted below:

1. Call for Sites (CFS): Sites in this category were sourced through the Call for Sites exercise undertaken in July-September 2017.
2. Additional Call for Sites (ACFS): Sites in this category were sourced through the second Call for Sites exercise, which was undertaken in August 2018.
3. Potential Sites Call for Sites (PSCFS): Sites within this category were sourced through the third Call for Sites exercise, which was undertaken in October-December 2018.
4. Previously Considered Sites (PCS): Sites in this category are those which were promoted during the preparation of the Site Allocations LDD (2014) but were not adopted as site allocations.
5. Other Sites Put Forward (OSPF): Sites in this category are those which were promoted outside of the formal Call for Sites exercises.
6. Urban Capacity Sites (varying references, dependent on location): Sites in this category were identified in the Urban Capacity Study (2020) and subsequently included in the SHELAA.
7. Refused and Withdrawn Application Sites (RWA): Sites in this category were sourced from a review of full and outline planning applications which were refused or withdrawn over the 2015-2020 period.
8. Edge of Settlement Sites (EOS): Sites in this category were identified in the Edge of Settlement and New Settlement Scoping Report (2020).
9. Out of Settlement (OOS): Sites in this category were identified in the Edge of Settlement and New Settlement Scoping Report (2020).
10. Existing Allocations (H): Sites in this category are existing allocations in the Site Allocations LDD (2014) which have not been granted planning permission.
11. Brownfield Register Sites (BR): Sites in this category are those which are on Three Rivers District Council's Brownfield Land Register (2019). Sites on the Brownfield Land Register which are existing allocations or were promoted through the Call for Sites exercises were not included in this category to avoid duplication between categories.

The assessments of these sites against the SA framework of objectives are included in Appendix F and Appendix G of this Interim SA Report, as follows:

- Appendix F includes all the 'Sites Proposed for Allocation' in the Regulation 18 Local Plan.
- Appendix G includes all the sites which are not being taken forward.

In addition to these potential housing sites the SA has also assessed potential site allocations for non-residential uses, including those for employment and education. Some of these sites are existing allocations in the Site Allocations LDD, whilst others are new proposals for allocation. The assessments for those sites are also included in Appendix F.

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## 6 Assessment of Regulation 18 Local Plan

### 6.1 Introduction

The proposed policies and site allocations which are included in the Regulation 18 Local Plan have been assessed using the methodology described in Section 3.2 in order to identify the likely effects which would result were the policies to be adopted in a new Local Plan. The findings of the SA undertaken at this stage will be used to inform the next stage of the planning process, that being the development of the Publication Local Plan.

The sections which follow summarise the results of the assessments for each Local Plan element followed by an assessment by SA objective of the plan as a whole (including any cumulative, synergistic and secondary effects). In addition, cross boundary effects are discussed in Section 6.5.

These assessments have considered the potential effects which would result from implementation of the policies and sites in isolation and in general do not consider potential mitigation or enhancement measures which could help to improve the sustainability performance of the policy or site, whether this would be from other elements in the Local Plan or non-Local Plan related mitigation/enhancement. Where appropriate the potential mitigation/enhancement is presented as an addition to the specific assessments.

### 6.2 Summary of the Assessment of Regulation 18 Local Plan Part 1

The detailed assessments for all the 'Proposed Policies' which are included in Part 1 of the Regulation 18 Local Plan are provided in Appendix E to this Interim SA Report. A summary of these assessments is provided below.

Policy/Theme	SA Objectives														
	Biodiversity	Water	Flood Risk	Climate Change	Air Quality	Soils	Resource Efficiency	Historic Environment	Landscape and Townscape	Health and Wellbeing	Sustainable Location	Community Cohesion	Housing	Sustainable Prosperity	Employment and Skills
<b>Sustainable Development</b>															
Potential Housing Distribution	✓	-	-	✓	✓	✓	-	-	✓	✓	✓✓	✓	✓	✓	✓
Housing Growth Level	x	x	-	x	x	x	x	?	x	✓	-	?	✓/x	✓	✓
Preferred Policy Option 1: Strategic Policy: Overarching Policy on Sustainable Development	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
Preferred Policy Option 2: Housing Mix and Type Preferred Policy Option 3: Housing Density Preferred Policy Option 4: Affordable Housing	-	-	-	✓	✓	✓	-	✓	x	?	✓	✓	✓✓	-	-
Preferred Policy Option 5: Provision for Gypsies, Travellers and Travelling Showpeople	✓	-	✓	-	-	-	-	✓	✓	-	✓	✓	✓	-	-
Preferred Policy Option 6: Residential Design and Layout and Accessible and Adaptable Buildings	-	-	-	-	-	-	-	-	?	✓	-	✓	✓	-	-
<b>Employment</b>															
Preferred Policy Option 7: Employment and Economic Development Preferred Policy Option 8: Warner Bros. Studios at Leavesden	?	-	-	x	x	✓	-	?	x	-	✓	-	-	✓✓	✓✓
Preferred Policy Option 9: Retail and Leisure	-	-	-	✓	✓	-	-	✓	✓	?	✓	✓	-	✓	✓
<b>Social and Community Facilities/ Health and Wellbeing</b>															
Preferred Policy Option 10: Social and Community Facilities Preferred Policy Option 11: Health and Wellbeing	✓	-	-	-	-	-	-	-	✓	✓✓	✓	✓✓	-	-	-

Climate Change															
Preferred Policy Option 12: Carbon Dioxide Emissions and On-site Renewable Energy	✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	-	-	-	-	-	-
Preferred Policy Option 13: Adapting to Climate Change and Sustainable Construction	✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	-	-	-	-	-	-
Preferred Policy Option 14: Renewable and Low Carbon Energy Developments	✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	-	-	-	-	-	-
Preferred Policy Option 15: Flood Risk and Water Resources	✓	✓✓	✓✓	✓✓	-	-	✓	✓	✓	-	-	-	-	-	-
Green Belt															
Preferred Policy Option 16: Green Belt	?	-	-	-	-	✓	-	-	✓	✓	?	-	✓	-	-
Environment															
Preferred Policy Option 17: Ground Conditions, Contamination and Pollution	✓	✓	-	-	✓✓	✓	-	-	✓	✓	-	-	-	-	-
Preferred Policy Option 18: Waste Management and Recycling	-	-	-	-	-	✓	✓✓	-	✓	✓	-	-	-	-	-
Green Infrastructure															
Preferred Policy Option 19: Green and Blue Infrastructure	✓✓	✓✓	✓	-	-	-	-	✓	✓	✓	✓	-	-	-	-
Preferred Policy Option 20: Landscape Character	✓	-	-	-	-	✓	-	-	✓✓	✓	-	-	-	-	-
Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping	✓✓	✓	✓	-	✓	✓	-	-	✓	✓	-	-	-	-	-
Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation	-	-	-	-	-	-	-	✓	✓	✓✓	-	✓	-	-	-
Design and Heritage															
Preferred Policy Option 23: Local Distinctiveness and Place Shaping	✓	-	-	✓	-	-	-	✓	✓✓	✓	-	✓	✓	-	-
Preferred Policy Option 24: Advertisements	✓	-	-	✓	-	-	-	✓	✓✓	✓	-	✓	✓	-	-
Preferred Policy Option 25: Heritage and Historic Environment	✓	-	-	✓	-	-	-	✓✓	✓✓	-	-	-	-	✓	✓
Transport and Connections															
Preferred Policy Option 26: Sustainable Transport and Travel	✓	?	✓	✓✓	✓✓	-	-	✓	✓	✓	✓	-	-	✓	✓
Preferred Policy Option 27: Parking	✓	?	✓	✓✓	✓✓	-	-	✓	✓	✓	✓	-	-	✓	✓
Preferred Policy Option 28: Deliveries, Servicing and Construction	✓	?	✓	✓✓	✓✓	-	-	✓	✓	✓	✓	-	-	✓	✓
Preferred Policy Option 29: Waterways	✓	?	✓	✓✓	✓✓	-	-	✓	✓	✓	✓	-	-	✓	✓
Preferred Policy Option 30: Broadband and Electronic Communications	✓	?	✓	✓✓	✓✓	-	-	✓	✓	✓	✓	-	-	✓	✓



The assessments of proposed policies identified some significant positive effects against sustainability objectives as described below. No significant negative effects were identified:

	SA Objective	Significant effects identified
1	To protect, maintain and enhance biodiversity and geodiversity at all levels.	✓✓ in relation to <b>Preferred Policy Option 19: Green and Blue Infrastructure</b> and <b>Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping</b> which seek to conserve and enhance the Local Nature Reserves, Wildlife Sites, Sites of Special Scientific Interest and other important habitats in the District, which would have significant positive effects for biodiversity.
2	To protect, maintain and enhance water resources (including water quality and quantity)	✓✓ in relation to <b>Preferred Policy Option 15: Flood Risk and Water Resources</b> which seeks to protect and increase efficiency of groundwater resources. <b>Preferred Policy Option 19: Green and Blue Infrastructure</b> seeks to conserve and enhance the District's rivers and the canal. These policies would have significant positive effects against the water objective.
3	To reduce flood risk	✓✓ in relation to <b>Preferred Policy Option 15: Flood Risk and Water Resources</b> which would ensure that development is located away from high risk flood zones.
4	Reduce greenhouse gas emissions and adapt to the effects of climate	✓✓ in relation to <b>Preferred Policy Option 12: Carbon Dioxide Emissions and On-site Renewable Energy</b> , <b>Preferred Policy Option 13: Adapting to Climate Change and Sustainable Construction</b> and <b>Preferred Policy Option 14: Renewable and Low Carbon Energy Developments</b> which contain measures to increase energy efficiency and support low carbon and renewable energy sources. <b>Preferred Policy Option 26: Sustainable Transport and Travel</b> contains measures to support sustainable modes of transport, reduce freight activity and reduce private car usage, which would have significant positive effects for the climate change objective.
5	Achieve good air quality, especially in urban areas	✓✓ in relation to <b>Preferred Policy Option 17: Ground Conditions, Contamination and Pollution</b> which requires developments to minimise air pollution and be located in areas which will not cause more pollution in Air Quality Management Areas. <b>Preferred Policy Option 26: Sustainable Transport and Travel</b> contains measures to support sustainable modes of transport, reduce freight activity and reduce private car usage, which would have significant positive effects for the air quality objective.

	SA Objective	Significant effects identified
6	Make efficient use of land and protect soils	No significant effects identified.
7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	✓✓ in relation to <b>Preferred Policy Option 18: Waste Management and Recycling</b> which significantly benefits resource efficiency by encouraging and enabling re-use and recycling of materials right from the point of construction.
8	To identify, conserve and enhance the historic environment and cultural assets	✓✓ in relation to <b>Preferred Policy Option 25: Heritage and Historic Environment</b> which aims to protect and enhance all aspects of the historic environment in the District, including heritage assets, listed or locally important buildings, conservation areas, historic parks and gardens and archaeological assets, which would have a significant positive effect against this objective.
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness	✓✓ in relation to <b>Preferred Policy Option 20: Landscape Character</b> which protects against development in the Chilterns AONB and requires that all developments make a positive contribution to the landscape. <b>Preferred Policy Option 23: Local Distinctiveness and Place Shaping</b> which seeks to enhance the local townscape through high quality design and <b>Preferred Policy Option 25: Heritage and Historic Environment</b> would reserve local character by protecting heritage assets and landscape features.
10	To improve the health and wellbeing of the local population	✓✓ in relation to <b>Preferred Policy Option 10: Social and Community Facilities</b> and <b>Preferred Policy Option 11: Health and Wellbeing</b> . These policies support the provision of new open space, sport and recreation facilities and active travel infrastructure which will make a significant positive contribution to residents' health and wellbeing.
11	To develop in sustainable locations	✓✓ in relation to the <b>Potential Housing Distribution</b> , as indicated in paragraph 2.49 of the Part 1 Regulation 18 Local Plan, which prioritises developments in the most sustainable locations close to key services and facilities.
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime	✓✓ in relation to <b>Preferred Policy Option 10: Social and Community Facilities</b> and <b>Preferred Policy Option 11: Health and Wellbeing</b> . These policies seek to protect existing social, cultural and community facilities, alongside the provision of enhanced facilities which will be significantly positive for community cohesion.

	SA Objective	Significant effects identified
13	Ensure that everyone has access to good quality housing that meets their needs	✓✓ in relation to <b>Preferred Policy Option 2: Housing Mix and Type</b> , <b>Preferred Policy Option 3: Housing Density</b> and <b>Preferred Policy Option 4: Affordable Housing</b> which ensure that there is a suitable range of types, styles, design and tenure mix to support needs of different groups. <b>Preferred Policy Option 6: Residential Design and Layout and Accessible and Adaptable Buildings</b> contributes toward meeting the District's affordable and accessible housing need.
14	Achieve sustainable levels of prosperity and economic growth	✓✓ in relation to <b>Preferred Policy Option 7: Employment and Economic Development</b> and <b>Preferred Policy Option 8: Warner Bros. Studios at Leavesden</b> as these policies contribute to overall employment levels in a diverse range of jobs, in areas accessible to public transport and with mixed use development which would have a significant positive effect on economic growth in the area.
15	To ensure local residents have employment opportunities and access to training	✓✓ in relation to <b>Preferred Policy Option 7: Employment and Economic Development</b> and <b>Preferred Policy Option 8: Warner Bros. Studios at Leavesden</b> as these policies seek to safeguard existing employment sites (including land for Warner Bros Studios which is of national importance) and would provide new employment space. This would have a significant positive effect on employment opportunities for the District.

### 6.3 Summary of the Assessment of Regulation 18 Local Plan Part 2

The assessments for all the ‘Sites for Potential Allocation’ and associated policies which are included in Part 2 of the Regulation 18 Local Plan are provided in Appendix F to this Interim SA Report. A summary of these assessments is provided by settlement in the tables below.

#### 6.3.1 Proposed policy on housing allocations

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Policy															
Proposed policy on housing allocations	-	-	-	-	-	-	-	-	-	✓	-	-	✓✓	-	-

#### 6.3.2 Housing allocations included in Regulation 18 Local Plan Part 2

SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment	
Site Location																
Abbots Langley & Leavesden	Site Ref: CFS3 Land adjacent to Fortunes Farm, High Elms Lane, Abbots Langley	x	-	-	x	-	x	-	?	x	?	x	✓	-	-	
	Site Ref: CFS4 Land at Warren Court, Woodside Road	x	-	-	x	-	x	-	?	?	✓	x	✓	-	-	
	Site Ref: CFS6 Land at Mansion House Farm Equestrian Centre	x	-	-	✓	-	x	-	x	?	✓	✓	✓	-	-	
	Site Ref: CFS26c Land to the west of the Kings Langley Estate	x	-	-	✓	?	x	-	?	x	?	✓	✓	✓	-	✓
	Site Ref: PCS21 Land at Love Lane	x			✓		x				✓	✓	✓			

SA Objective		SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Location																
		-	-	-	✓	-	✗	-	?	?	✓	✓	✓	✓	-	-
	Site Ref: EOS4.0 Land adjacent to Bedmond Road	✗	-	-	✓	?	✗	-	?	✗	?	✓	✓	✓	-	-
	Site Ref: AB18 Parsonage Close Garages	?	-	-	✓	-	✓	-	?	?	?	✓	-	✓	-	-
	Site Ref: AB26 Tibbs Hill Road Garages	-	-	-	✓	-	✓	-	?	?	✓	✓	-	✓	-	-
	Site Ref: AB31 Jacketts Field Garages	-	-	?	✓	-	✓	-	-	?	?	✓	-	✓	-	-
	Site Ref: AB32 Yard Tibbs Hill Road	-	-	?	✓	-	✓	-	-	-	?	✓	-	✓	-	-
	Site Ref: AB39 Rosehill Gardens Garages, Abbots Langley	?	-	-	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: H3 Pin Wei	-	-	-	✓	-	✓	-	?	-	✓	✓	-	✓	✗	✗
	Site Ref: H4 Furtherfield Depot	-	-	-	✓	-	✓	-	-	?	✓	✓	✓	✓	-	-
	Site Ref: H6 Hill Farm Industrial Estate	-	-	-	✓	-	✓	-	-	?	✓	✓	✓	✓	?	?
Bedmond	Site Ref: CFS10 Land between Millhouse Lane and Bell Lane, Bedmond	✗	-	-	✓	-	✗	-	?	?	✓	✓	✓	✓	-	-
	Site Ref: CFS56 Church Hill Road, Bedmond	✗	-	-	✓	-	-	-	?	✗	?	✓	✓	✓	-	-
	Site Ref: ACFS9e Land west of Bedmond Road	✗	-	-	✓	-	✗	-	-	✗	✓	✓	✓	✓	-	-
Garston	Site Ref: CFS65 Land north of Bucknalls Lane	✗	-	-	✓	?	✗	-	-	✗	?	✓	✓	✓	-	-
Kings Langley	Site Ref: ACFS8b Flowerhouse	-	-	✗	✓	?	✓	-	✗	-	?	✓	-	✓	-	✗

	SA Objective	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
	Site Location															
	Site Ref: PSCFS23 Former Chicken Processing Plant, Woodlands Road	?	-	?	x	-	x	-	?	?	✓	x	✓	✓	-	-
Langleybury	Site Ref: H7 Langleybury House	-	-	-	x	-	✓	-	?	-	✓	x	✓	✓	-	-
Croxley Green	Site Ref: CFS19 Land adjacent to 62-84 & 99-121 Sycamore Road	x	?	-	✓	-	x	-	-	-	✓	✓	-	✓	-	-
	Site Ref: CFS20 Land at Croxley Station	-	?	-	✓	-	✓	-	-	-	?	✓	✓	✓	-	-
	Site Ref: CFS61 Cinnamond House, Cassiobridge	-	?	?	✓	-	✓	-	-	-	✓	✓	✓	✓	-	-
	Site Ref: CG16 Garages rear of Owens Way	-	-	?	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: CG47 Garages off Grove Crescent	-	-	?	✓	-	✓	-	-	?	✓	✓	✓	✓	-	-
	Site Ref: CG65 British Red Cross, Community Way	-	-	-	✓	-	✓	-	?	-	✓	✓	✓	✓	-	-
	Site Ref: H9 33 Baldwins Lane	-	?	?	✓	-	✓	-	-	?	?	✓	✓	✓	?	?
	Site Ref: H10 Killingdown Farm	x	-	-	✓	-	x	-	x	x	✓	✓	✓	✓	-	-
Rickmansworth	Site Ref: OSPF22 Batchworth Park Golf Course	x	?	-	✓	-	x	-	?	?	x	✓	✓	✓	x	x
	Site Ref: CFS59 Land on London Road	x	?	-	✓	-	-	-	?	?	✓	✓	-	✓	-	-
	Site Ref: CFS40a Land at Park Road (Revised Boundary)	x	?	-	✓	-	?	-	x	?	?	✓	✓	✓	-	-
	Site Ref: CFS41 Rickmansworth Station, Station Approach	?	?	-	✓	-	?	-	x	?	?	✓	✓	✓	-	-
	Site Ref: CFS60 Affinity Water Depot, Church Street	-	?	xx	✓	-	✓	-	?	x	✓	✓	✓	✓	-	-
	Site Ref: CFS77 Rickmansworth Library	-	?	-	✓	-	✓	-	x	?	✓	✓	✓	✓	-	-

SA Objective		SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Location																
	Site Ref: RWA13 Banstead Down, Old Chorleywood Rd	x	?	-	✓	-	x	-	?	-	?	✓	-	✓	-	-
	Site Ref: H17 Police Station, Rectory Road	-	?	?	✓	-	✓	-	?	-	✓	✓	✓	✓	-	-
	Site Ref: H18 Royal British Legion, Ebury Road	-	?	-	✓	-	✓	-	x	-	✓	✓	-	✓	-	-
	Site Ref: H21 Bridge Motors, Church Street	-	?	?	✓	-	✓	-	x	-	✓	✓	-	✓	-	-
	Site Ref: H22 Depot, Stockers Farm Road	x	-	?	✓	-	✓	-	?	?	✓	✓	✓	✓	?	?
Mill End	Site Ref: EOS7.0 Land to the south of Shepherds Lane and west of M25	x	?	-	✓	?	x	-	?	x	?	✓	✓	✓	-	-
	Site Ref: P4a Quickwood Close Garages (Larger Site)	-	?	-	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: P7 Oakfield at Garages	-	?	-	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: P33 Chiltern Drive	-	?	-	✓	-	✓	-	-	-	✓	✓	-	✓	-	-
	Site Ref: P38 Garages at Whitfield Way	-	?	-	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: P39 The Queens Drive Garages, Mill End	-	?	-	✓	?	✓	-	-	?	?	✓	-	✓	-	-
	Site Ref: RW31 Garden land off Uxbridge Road	x	?	?	✓	-	x	-	?	-	?	✓	-	✓	-	-
	Site Ref: H15 Garages rear of Drillyard, West Way	?	-	-	✓	-	✓	-	-	?	?	✓	✓	✓	-	-
Chorleywood	Site Ref: CFS16 Land at Chorleywood Station (Station car park and adjoining land)	-	-	?	✓	-	✓	-	?	?	?	✓	✓	✓	-	-
	Site Ref: CFS18b Hill Farm, Stag Lane, Chorleywood	x	-	-	✓	-	x	-	x	x	✓	✓	-	✓	-	-

SA Objective		SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Location																
	Site Ref: CFS57 Pheasants Ridge Gap, Berry Lane	x	?	-	✓	?	x	-	?	x	?	✓	✓	✓	-	-
	Site Ref: CFS72 Land off Solesbridge Lane, Chorleywood	x	-	x	x	?	x	-	?	x	?	x	-	✓	-	-
	Site Ref: ACFS1 Heath House	-	-	-	✓	-	✓	-	x	?	-	✓	-	✓	-	-
	Site Ref: PSCFS19 Land south west of Berry Lane, Chorleywood	x	-	-	✓	?	x	-	?	x	?	✓	-	✓	-	-
	Site Ref: CW9 Garages at Copmans Wick	-	-	?	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: CW24 Garages rear of Green Street, CW	-	-	-	✓	-	✓	-	?	?	?	✓	-	✓	-	-
	Site Ref: CW25 Ryman Court Garages, Chorleywood	-	-	-	✓	-	✓	-	?	?	✓	✓	-	✓	-	-
Maple Cross & West Hyde	Site Ref: CFS31 24 Denham Way and land to rear of Maple Cross	x	?	-	x	-	x	-	?	x	✓	x	✓	✓	x	x
	Site Ref: MC11 40-42 Longcroft Road	-	?	-	x	-	✓	-	-	-	✓	x	-	✓	-	-
	Site Ref: EOS12.2 Land to the west and south of Maple Cross (combined sites)	x	?	?	✓	?	x	-	x	x	?	x	✓	✓	✓	✓
	Site Ref: EOS12.3 Land to the north of Chalfont Lane	x	?	-	x	?	x	-	?	x	?	x	✓	✓	-	-
Moor Park & Eastbury	Site Ref: CFS22 Knoll Oak, Sandy Lane	x	-	-	x	-	✓	-	-	?	✓	x	✓	✓	-	-
Oxhey Hall	Site Ref: ACFS13b Hampermill Lane (Larger Site)	x	?	-	✓	-	x	-	?	x	✓	✓	✓	✓	-	-
	Site Ref: RWA6 165-167 Hampermill Lane	-	?	-	✓	-	✓/x	-	?	-	✓	✓	-	✓	-	-
	Site Ref: PCS16 Vivian Gardens	x	?	-	✓	-	-	-	-	?	✓	✓	-	✓	-	-
	Site Ref: H24 The Fairway, Green Lane	?	?	-	✓	-	✓	-	?	-	✓	✓	✓	?	-	-



SA Objective		SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Location																
South Oxhey	Site Ref: CFS52a Former Sir James Altham School (Revised Boundary)	x	-	-	✓	-	x	-	?	-	✓	✓	✓	✓	-	-
	Site Ref: AS13 Garages at Blackford Road	-	-	?	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: AS31 Garages at Woodhall Lane	-	-	?	✓	-	✓	-	-	?	?	✓	-	✓	-	-
	Site Ref: NW34a Garages r/o The Dick Whittington	-	-	-	✓	-	✓	-	-	?	✓	✓	-	✓	-	-
	Site Ref: BR20 Northwick Day Centre	?	-	?	✓	-	✓	-	-	-	✓	✓	?	✓	-	-
Carpenders Park	Site Ref: CFS12 Kebbell House and Land to Rear, Delta Gain, Carpenders Park	-	-	?	✓	-	✓	-	-	?	?	✓	✓	✓	✓	✓
	Site Ref: CFS13 Land at Oxhey Lane, Watford Heath	x	-	-	✓	-	-	-	x	x	✓	✓	✓	✓	-	-
	Site Ref: CFS14 Land North of Oxhey Lane, Carpenders Park	x	?	?	✓	-	x	-	-	x	✓	✓	✓	✓	-	-
	Site Ref: CFS69a Land at Carpenders Park Farm - Revised Boundary	x	-	?	✓	-	x	-	?	x	✓	✓	✓	✓	-	-
	Site Ref: PCS47 South of Little Oxhey Lane, Carpenders Park	x	-	?	✓	-	x	-	-	x	✓	✓	✓	✓	-	-

6.3.3 Preferred Policy on Sites for Gypsies and Travellers and Travelling Showpeople

SA Objective Policy	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Preferred Policy on Sites for Gypsies and Travellers and Travelling Showpeople	-	-	-	-	-	-	-	-	-	-	-	✓	✓	-	-

6.3.4 Potential employment allocations

SA Objective Site location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Ref: CFS70a Croxley Business Park - Employment	?	?	x	✓	-	✓	-	-	?	-	✓	-	-	✓	✓
Site Ref: CFS70b Croxley Business Park - Open Space	x	?	x	✓	-	-	-	-	?	✓	✓	✓	-	-	-
Site Ref: CFS32a Land at Lynsters Farm	x	?	x	x	-	x ?	-	x	x	?	x	-	-	✓	✓

### 6.3.5 Existing employment sites

SA Objective Site location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Ref: E(a) Croxley Business Park	-	?	?	-	-	-	-	-	-	-	-	-	-	✓	✓
Site Ref: E(b) Tolpits Lane	-	?	?	-	-	-	-	-	-	-	-	-	-	✓	✓
Site Ref: E(d) Maple Cross/Maple Lodge	?	-	-	-	-	?	-	?	-	?	-	-	-	✓✓	✓✓
Site Ref: E(e) Kings Langley Employment Site	-	?	?	-	-	-	-	-	-	-	-	-	-	✓	✓

### 6.3.6 Warner Bros. Studio at Leavesden

SA Objective Site location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Site Ref: CFS28 Land at Gypsy Lane, Hunton Bridge Leavesden Studios expansion	x	-	-	✓	-	x	-	-	x	-	✓	-	-	✓✓	✓✓
Site Ref: OSPF6 Land west of Leavesden Aerodrome	x	?	?	✓	-	x	-	?	x	-	✓	-	-	✓✓	✓✓

6.3.7 **Education Allocations**

SA Objective Policy and Site location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Proposed Policy on Education Allocations	-	-	-	-	-	-	-	-	-	-	-	✓	-	-	✓
Site Ref: CFS11 Carpenters Park Farm, Oxhey Lane, Carpenters Park	x	?	?	✓	-	x	-	?	x	-	✓	✓	-	-	✓
Site Ref: S(c) Woodside Road	x	-	-	✓	-	x	-	-	x	-	✓	✓	-	-	✓

6.3.8 **Proposed Insetting of Bedmond**

SA Objective Policy	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Proposed insetting of Bedmond	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓

6.3.9 **Langleybury and the Grove**

SA Objective Site location	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Proposed Policy on Langleybury and The Grove	-	-	-	-	-	-	-	-	-	-	-	-	✓	✓	✓
Site Ref: L&TG Langleybury and the Grove	x	?	?	x	?	✓/x	-	?	-	?	x	-	✓	✓	✓

6.3.10 *Proposed Policy on Maple Lodge Wastewater Treatment Works*

SA Objective Policy	SA1 Biodiversity	SA2 Water	SA3 Flood risk	SA4 Climate change	SA5 Air quality	SA6 Soils	SA7 Resources	SA8 Historic envt.	SA9 Landscape	SA10 Health	SA11 Sust. locations	SA12 Communities	SA13 Housing	SA14 Economy	SA15 Employment
Proposed Policy on Maple Lodge Wastewater Treatment Works	·	·	·	·	·	·	·	·	✓	·	·	·	·	·	·

The assessments of sites for potential allocation and associated policies identified some significant positive and negative effects against sustainability objectives as described below:

	SA Objective	Significant effects identified
1	To protect, maintain and enhance biodiversity and geodiversity at all levels.	No significant effects identified
2	To protect, maintain and enhance water resources (including water quality and quantity)	No significant effects identified
3	To reduce flood risk	<b>xx</b> in relation to housing allocation site <b>CFS60 Affinity Water Depot</b> as the River Colne flows through this site which is entirely within Flood Zone 2 and has a large area within Flood Zone 3a and 3b, posing a significant risk of flooding.
4	Reduce greenhouse gas emissions and adapt to the effects of climate	No significant effects identified
5	Achieve good air quality, especially in urban areas	No significant effects identified
6	Make efficient use of land and protect soils	No significant effects identified
7	To use natural resources, both finite and renewable, as efficiently as possible, and re-use finite resources or recycled alternatives wherever possible	No significant effects identified
8	To identify, conserve and enhance the historic environment and cultural assets	No significant effects identified
9	To conserve and enhance landscape and townscape character and encourage local distinctiveness	No significant effects identified
10	To improve the health and wellbeing of the local population	No significant effects identified
11	To develop in sustainable locations	No significant effects identified
12	To improve community cohesion through reducing inequalities, promoting social inclusion and reducing crime and the fear of crime	No significant effects identified

	SA Objective	Significant effects identified
13	Ensure that everyone has access to good quality housing that meets their needs	<p>✓✓ in relation to housing allocation sites <b>CFS26c Land to the west of the Kings Langley Estate, OSPF22 Batchworth Park Golf Course, EOS7.0 Land to the south of Shepherds Lane and west of M25, EOS12.2 Land to the west and south of Maple Cross, and PCS47 South of Little Oxhey Lane</b>. All of these sites have a capacity to support 500 or more dwellings and make a significant contribution towards providing housing in the District.</p> <p><b>The proposed policy on housing allocations</b> is also identified as having a significant positive effect on the housing objective.</p>
14	Achieve sustainable levels of prosperity and economic growth	<p>✓✓ in relation to Warner Bros Studio at Leavesden expansion sites <b>CFS28 Land at Gypsy Lane, Hunton Bridge</b> and <b>OSPF6 Land west of Leavesden Aerodrome</b> given the importance of the studio to the local and national economy. These sites would allow expansion of the studio which would contribute significantly to the growth of the creative industry in the District.</p> <p>The existing employment site <b>E(d) Maple Cross/Maple Lodge</b> is also identified as having significant positive effects against this objective, as the site is contributing to meeting demand for industrial floorspace in the District due to its spare capacity of approx. 18,000sqm/5ha.</p>
15	To ensure local residents have employment opportunities and access to training	<p>✓✓ in relation to Warner Bros Studio at Leavesden expansion sites <b>CFS28 Land at Gypsy Lane, Hunton Bridge</b> and <b>OSPF6 Land west of Leavesden Aerodrome</b> given the importance of the studio to the local and national economy as an employer and a visitor site. These sites would allow expansion of the studio which would contribute significantly to the growth of the creative industry in the District.</p> <p>The existing employment site <b>E(d) Maple Cross/Maple Lodge</b> is also identified as having significant positive effects against this objective, as the site is contributing to meeting demand for industrial floorspace in the District due to its spare capacity of approx. 18,000sqm/5ha.</p>

### 6.3.11 Settlement level effects

In addition to the site specific effects associated with the proposed housing allocations, as summarised in Section 6.3, it is also necessary to consider any 'settlement level' effects, for example the cumulative effects that might result from the overall housing increase in a settlement. The approach taken by the SA at this Regulation 18 stage has been to base such assessments on the percentage level of dwelling

number increase in a settlement which would result from the delivery of the proposed housing allocations in the Regulation 18 Local Plan Part 2 Sites for Potential Allocation.

Table 6-1 provides details of the approximate percentage increase to the settlements for which there are proposed housing allocations. The estimates are based on the assumption of there being 2.3 people per new dwelling and are therefore an approximation.

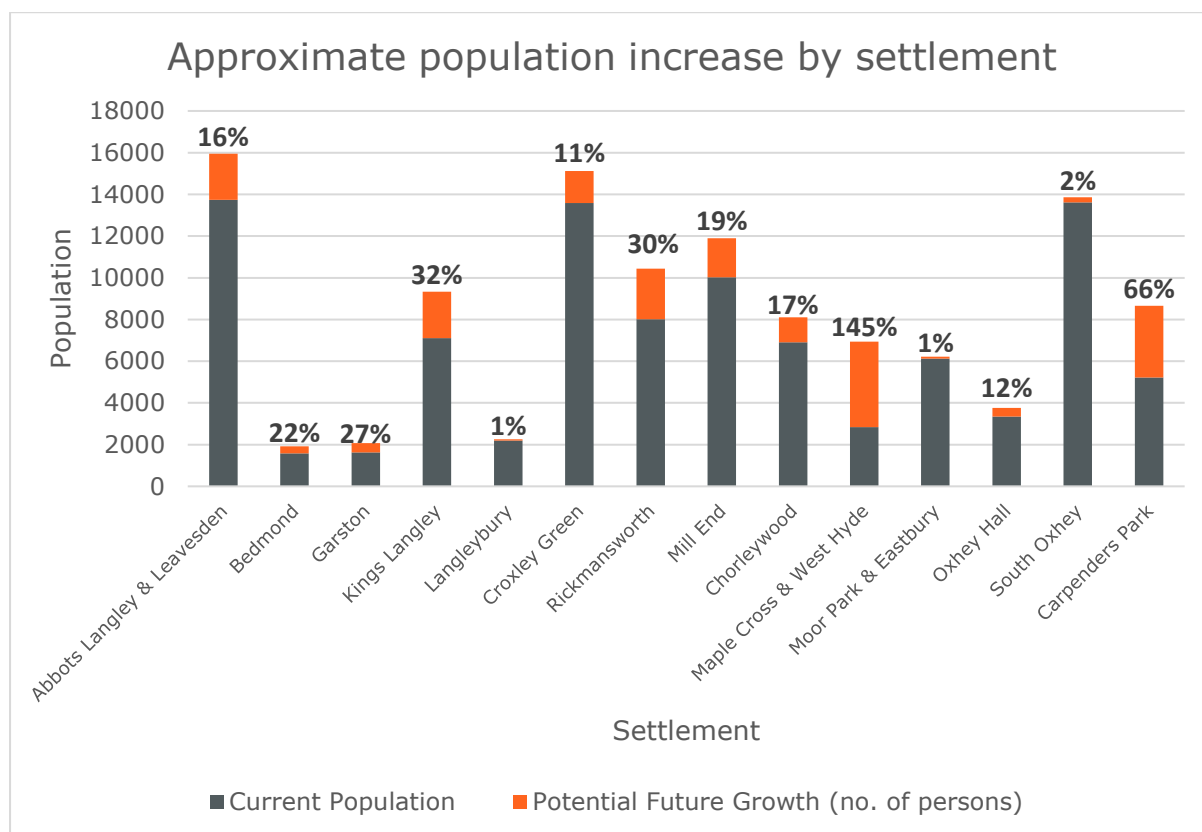
**Table 6-1: Approximate percentage population increase by settlement**

Settlement	Potential Future Growth (indicative no. of dwellings)	Approximate Potential Future Growth (no. of persons)	Current Population	Approximate % Increase in Population at end of plan period
Abbots Langley & Leavesden*	963	2215	13737	<b>16%</b>
Bedmond	151	347	1575	<b>22%</b>
Garston	190	437	1632	<b>27%</b>
Kings Langley**	974	2240	7100	<b>32%</b>
Langleybury	25	58	2199	<b>1%</b>
Croxley Green	670	1541	13579	<b>11%</b>
Rickmansworth	1053	2422	8012	<b>30%</b>
Mill End	817	1879	10024	<b>19%</b>
Chorleywood	522	1201	6905	<b>17%</b>
Maple Cross & West Hyde	1783	4101	2835	<b>145%</b>
Moor Park & Eastbury	35	81	6132	<b>1%</b>
Oxhey Hall	179	412	3347	<b>12%</b>
South Oxhey	110	253	13613	<b>2%</b>
Carpenders Park	1499	3448	5212	<b>66%</b>

\*for the purpose of this 'settlement level effects' assessment, the housing growth associated with Site CFS26c (Land to the west of the Kings Langley Estate) has been 'apportioned' to Kings Langley and not Abbots Langley & Leavesden as is the case in the Local Plan Regulation 18 Part 2 consultation and elsewhere in this SA.

\*\*for Kings Langley the figures are based on the overall population of the settlement and not just the part that is in Three Rivers District. If the 'Three Rivers only' population were to be used it would equate to an approximate 85% increase in population. In addition, as detailed in "" above, Site CFS26c has been 'apportioned' to Kings Langley for the purposes of this assessment, given its location adjacent to the existing built area of Kings Langley.





As can be seen from Table 6-1 the settlement which would see the largest percentage increase to its overall population over the Local Plan period is Maple Cross (145%), followed by Carpenders Park (66%). A summary of how those two settlements are likely to be affected by these levels of growth is provided below. There will also be some settlement level effects for the other towns and villages in the District, however given the lower scale of the increase to their populations compared to Maple Cross and Carpenders Park these have not been investigated at this stage of the SA.

### 6.3.11.1 *Maple Cross*

Maple Cross is a settlement not well served by good transport links, services or facilities, making it a Lower Super Output Area (LSOA name: Three Rivers 009D) which is one of the most deprived in the District. This situation has worsened in the period between the 2015 Index of Multiple Deprivation and the most recent index published in 2019<sup>6</sup>.

Whilst the scale of growth proposed in the Regulation 18 Local Plan (1,783 new dwellings) would inevitably change the character of the settlement, as well as affecting local landscapes (SA9), it would bring with it the requirement for new and improved services and facilities that would help to tackle the existing issues associated with deprivation (SA12 and SA13).

6

<https://reports.instantatlas.com/legacy/report/view/a0bcf43e68524a11b96cc82611fbb445/E01023838?clear=true&from=RB2>

The new development would provide new facilities to improve the offer of services to the settlement, benefitting existing and future residents. Site EOS12.2 would result in primary education facilities (proposed as an extension to the existing primary school), a local centre (including local shops, community facilities, a nursery, care home and flexible commercial/work space), a health centre, open space, play space and improvements to bus stops, an extended bus route through the site and pedestrian and cycle routes. Off-site improvements to the existing recreation ground are also proposed.

This new development would therefore provide better transport connections, improve access to public open space and provide more local services (particularly in respect of the local centre and provision of a health centre). The growth in the settlement would also result in Maple Cross 'moving up' the settlement hierarchy to a Key Centre (currently a Secondary Centre).

An increase in population would also help to support the viability of the existing services, facilities and local businesses.

#### 6.3.11.2 *Carpenders Park*

Over the Local Plan period Carpenders Park would see an approximate 66% increase in population through the development of 1,499 new dwellings. Whilst this level of increase could put pressure on local facilities and services it would also help to support the viability of the existing services, facilities and local businesses. The two large developments proposed for Carpenders Park (Site CFS69a: Land at Carpenders Park Farm and Site PCS47: South of Little Oxhey Lane) would provide new open space and play space for the community as well as new primary schools – which would benefit the wider community. In addition, there is a secondary school allocation (CFS11) proposed in Carpenders Park which would help to support demand for secondary education arising from the potential residential sites, whilst also helping to meet existing secondary education demand in Carpenders Park and the wider surrounding area. The potential cumulative growth in Carpenders Park along Oxhey Lane and Little Oxhey Lane may also be of a scale to support transport improvements on networks to and from the settlement.

It should be noted that Site PCS47 (South of Little Oxhey Lane) which would contribute 678 of the 1,499 dwellings is located in close proximity to South Oxhey and could therefore have more of an effect (both opportunities and pressures) on South Oxhey than on Carpenders Park. However, as South Oxhey is predicted to have a population increase of only 2% (see Table 6-1) then the level of impact/opportunity resulting from Site PCS47 is not likely to be significant.

## 6.4 **Whole Plan Assessment by SA Topic**

### 6.4.1 *Introduction*

The Local Plan will provide both development enabling policies (including site allocations) and development controlling policies.

This section provides an assessment against each SA Objective of the Regulation 18 Local Plan (Part 1 and Part 2) as whole, identifying the within-plan cumulative effects taking into account how the development controlling type elements will mitigate and/or enhance the effects likely to result from the development enabling elements of the Local Plan.

#### 6.4.2 SA1: Biodiversity

The level of development proposed in the Regulation 18 Local Plan, along with the potential site allocations for housing, education and employment uses, will inevitably result in the need to develop on some greenfield sites in the District, with resulting effects on the biodiversity associated with those development sites taken forward and the green networks of which they may form a part. Also, once the new houses are occupied there will be increased pressure on the natural environment associated with recreational activities of new residents, as well as impacts from increased numbers of domestic pets. The recreational pressures could affect important sites for nature conservation both within and outside the District. In addition, there could be some adverse secondary effects on biodiversity as a result of increased pressure on water resources that would result from additional dwellings and enterprises in the District, when considered alongside new developments in neighbouring local authorities.

However, to act as a counter to these potential adverse effects, the proposed Potential Housing Distribution approach which is aimed at the prioritising of new development on previously developed land and in the urban areas will help to limit the amount of greenfield land required for new development and thereby reduce potential effects on biodiversity.

In addition, within-plan mitigation of any adverse effects associated with new developments (housing, employment etc.) will be provided by the development control type policies, in particular 'Preferred Policy Option 19: Green and Blue Infrastructure' and 'Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping' for both of which significant positive effects have been identified against the biodiversity objective. The latter of these policies requires that development should result in a net-gain for biodiversity.

At a development site level none of the Sites for Potential Allocation have been identified as having any significant effects (either positive or negative) against the biodiversity objective. Minor adverse effects have been identified for many of the sites, mainly in relation to their current greenfield status, however these assessments do not take into account the mitigation which will be provided by the Local Plan policies, in particular the requirement for a net-gain for biodiversity.

#### 6.4.3 SA2: Water

Over abstraction of water resources is an issue in the region, therefore providing for nearly 9,000 new dwellings over the Local Plan period would increase this pressure on water resources. The effect is likely to become more significant over time as more dwellings are built and the risk of periodic water shortages increases. New development could also result in the pollution of water courses both during construction and when developments are occupied, as well as affecting groundwater resources, particularly if the development is in a Groundwater Source Protection Zone (GSPZ). New development increases the potential for water pollution, associated with increased run-off from impermeable surfaces and the potential for sewer flooding in high rainfall events. The likelihood and level of such effects will be dependent on the specific development locations.

As a result, the SA has identified minor adverse effects against SA2: Water in relation to the proposed Housing Growth Level.

However, within-plan mitigation of any adverse effects associated with new developments (housing, employment etc.) will be provided by the development control type policies, in particular 'Preferred Policy Option 15: Flood Risk and Water Resources' and 'Preferred Policy Option 19: Green and Blue Infrastructure' for both of which significant positive effects have been identified against the water objective.

At a development site level none of the Sites for Potential Allocation have been identified as having any significant effects (either positive or negative) against the water objective, or any minor effects. Uncertain effects have been identified for many of the sites, mainly in relation to their location within Groundwater Source Protection Zones.

#### 6.4.4 SA3: Flood risk

At a Local Plan-wide level the SA has found ‘no predicted effects’ against this objective because the level of growth proposed in the Local Plan should be able to be provided without the need to develop in areas of higher flood risk.

Where potential flood risk issues could result, within-plan mitigation of any adverse effects associated with new developments (housing, employment etc.) will be provided by the development control type policies, in particular ‘Preferred Policy Option 15: Flood Risk and Water Resources’ for which significant positive effects have been identified against the flood risk objective. To support this, several other Preferred Policy Options have been assessed as having minor positive effects against this objective.

At a site specific level potential significant adverse effects have been identified in relation to potential housing allocation site CFS60 (Affinity Water Depot, Church Street) as the River Colne flows through this site which is entirely within Flood Zone 2 and has a large area within Flood Zone 3a and 3b, posing a significant risk of flooding. A number of other housing and potential employment sites have been identified as having minor adverse effects or uncertain effects given their location partly in, or adjacent to, flood risk areas.

#### 6.4.5 SA4: Climate Change

Making provision for nearly 9,000 new homes and 5.5ha of employment land over the Local Plan period would inevitably result in an increase in greenhouse gas emissions from energy used in the construction and occupation of new housing / employment uses and the associated activities including increases in traffic. This is recognised in the SA, with negative effects against this objective being identified for the elements which include potential proposals for housing and employment growth.

However, the prioritising of new development within the built-up urban areas as far as possible should help to reduce the need to travel and reduce the average distances travelled to access facilities. This should have a positive effect on reducing the growth of greenhouse gas (GHG) emissions from transport.

Mitigation will be provided through the policies under ‘Climate Change’ theme (Preferred Policy Options: 12 Carbon Dioxide Emissions and On-site Renewable Energy; 13 Adapting to Climate Change and Sustainable Construction; 14: Renewable and Low Carbon Energy Developments; and 15: Flood Risk and Water Resources), for which significant positive effects have been identified, as well as for policies under the ‘Transport and Connections’ theme, in particular Preferred Policy Option 26: Sustainable Transport and Travel for which significant positive effects have also been identified.

Other positive effects relating to climate change mitigation and adaptation could arise as a result of the policies under the ‘Sustainable Development’ theme.

At a site specific level no significant effects (either positive or negative) have been identified for the Sites for Potential Allocation, although some minor adverse effects have been identified for housing sites which are at a distance from services and facilities. Conversely, minor positive effects have been identified for sites which are in close proximity to services and facilities.

#### 6.4.6 SA5: Air Quality

Transport is a key source of air pollution and so inevitably making provision for nearly 9,000 new homes and 5.5ha of employment land over the Local Plan period would contribute to background emissions through an increase in the number of vehicles on the road. This is recognised in the SA, with negative effects against this objective being identified for the elements which include potential proposals for housing and employment growth.

However, as is the case for greenhouse gas emissions, the prioritising of new development in the urban areas and at the most sustainable edge of settlement locations should help to reduce the need to travel and reduce the average distances travelled to access facilities. This should have a positive effect on reducing the growth of greenhouse gas (GHG) emissions from transport.

Mitigation will be provided through the policies under 'Environment', 'Climate Change', and 'Transport and Connections' themes, in particular 'Preferred Policy Option 17: Ground Conditions, Contamination and Pollution' and 'Preferred Policy Option 26: Sustainable Transport and Travel' for both of which significant positive effects have also been identified – with minor positive effects from several other policies under these themes.

Minor positive effects relating to air quality could also arise as a result of policies in other plan elements, for example the 'Sustainable Development' theme, with the exception of the proposed Housing Growth Level.

At a site specific level no significant effects (either positive or negative) or minor effects have been predicted for the Sites for Potential Allocation. Some uncertain effects have been identified for housing sites which are in close proximity to major roads, in particular the M25 as their location could result in air quality issues for new residents.

#### 6.4.7 SA6: Soils

Making provision for nearly 9,000 new homes and 5.5ha of employment land over the Local Plan period would inevitably require development on some greenfield sites – with associated adverse effects on soils.

However, to act as a counter to these potential adverse effects, the Potential Housing Distribution approach, which is aimed at the prioritising of new development on previously developed land and in the urban areas will help to limit the level of soil sealing and degradation resulting from new development.

No significant effects (either positive or negative) have been identified against the soil objective, however minor positive effects have been identified for some of the development controlling policies.

At a development site level none of the Sites for Potential Allocation have been identified as having a potential significant effect (either positive or negative) against the soil objective. Minor adverse effects have been identified for many of the sites, mainly in relation to their current greenfield status and the loss of soil and agricultural land that would result. Conversely, minor positive effects have been identified for those sites which would utilise previously developed land.

#### 6.4.8 SA7: Resource efficiency

The level of new development proposed in the Local Plan will inevitably place demands on natural resources and create additional waste, both during the construction and operation/occupancy stages.

Mitigation will be provided through the policies under 'Environment' and 'Climate Change' themes, in particular 'Preferred Policy Option 18: Waste Management and Recycling' for which significant positive effects have been identified – with minor positive effects from policies under the 'Climate Change' theme (e.g. 'Preferred Policy Option 13: Adapting to Climate Change and Sustainable Construction').

At a development site level none of the Sites for Potential Allocation have been identified as having any potential effects (positive or negative) against the resource efficiency objective.

#### 6.4.9 SA8: *Historic Environment*

The potential new development proposed in the Regulation 18 Local Plan could result in adverse effects on heritage assets and their settings and the District's wider historic environment. The significance of the effects on the historic environment of delivering the new development and associated infrastructure will be largely dependent on the nature of any heritage assets and their settings that are associated with the sites, as well as the scale and design of the new developments relative to these. As a result, the SA has identified uncertain effects in relation to the plan elements covering housing and employment growth.

Policy Options under the 'Design and Heritage' theme will provide within-plan mitigation, particularly 'Preferred Policy Option 25: Heritage and Historic Environment' for which significant positive effects have been identified as this policy aims to protect and enhance all aspects of the historic environment in the District, including heritage assets, listed or locally important buildings, conservation areas, historic parks and gardens and archaeological assets. Other plan policies will support this through minor positive effects that have been identified (e.g. 'Preferred Policy Option 14: Renewable and Low Carbon Energy Developments' which requires that the impact on the local historic environment be taken into consideration for applications for renewable energy developments).

At a site specific level, none of the Sites for Potential Allocation have been identified to have any potential significant effects (either positive or negative), but many have some associated or nearby heritage assets that will need to be taken into consideration during the planning application process – as a result minor adverse effects or uncertain effects have been identified for many of the sites.

#### 6.4.10 SA9: *Landscape and Townscape*

Making provision for nearly 9,000 new homes and 5.5ha of employment land over the Local Plan period would inevitably result in effects on the local landscapes and townscapes in those areas where new development takes place. This could have the potential to result in adverse effects on the local and wider landscapes, such as the setting of the Chilterns AONB. This is recognised in the SA, with negative effects against this objective being identified for the plan elements which include proposals for the housing and employment growth.

However, to act as a counter to these potential adverse effects, the Potential Housing Distribution approach, which is aimed at the prioritising of new development on previously developed land and in the urban areas will help to limit the amount of open land which will be required to meet the housing and employment targets, thereby reducing levels of adverse effects on local landscapes.

Significant positive effects have been identified in relation to this objective for 'Preferred Policy Option 20: Landscape Character' which protects against development in the Chilterns AONB and requires that all developments make a positive contribution to the landscape and for 'Preferred Policy Option 23: Local Distinctiveness and Place Shaping' which seeks to enhance the local townscape through high quality design. Significant positive effects have also been identified for 'Preferred Policy Option 25:

Heritage and Historic Environment’ as it would reserve local character by protecting heritage assets and landscape features. A range of minor positive effects have also been identified for policies across a wide range of the Regulation 18 Local Plan themes.

At a site specific level, none of the Sites for Potential Allocation have been identified to have any significant effects on landscape/townscape (either positive or negative), however minor adverse effects have been identified for the sites on open land, particularly where development would encroach into open countryside or erode gaps between settlements. Uncertain effects have been identified for many of the sites on previously developed land, where redevelopment may improve the local landscape/townscape.

#### 6.4.11 SA10: Health and Wellbeing

Overall, the predicted impacts of the plan should have positive impacts against the objective to improve the health and wellbeing of the local population. This is achieved through policies which support the provision and improvements to housing, healthcare, education, the environment and facilities for leisure and recreation.

Significant positive effects have been identified in relation to ‘Preferred Policy Option 10: Social and Community Facilities’ and ‘Preferred Policy Option 11: Health and Wellbeing’ as these policies support the provision of new open space, sport and recreation facilities and active travel infrastructure which will make a significant positive contribution to residents’ health and wellbeing. Significant positive effects have also been identified in relation to ‘Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation’ which would protect against the loss of facilities and support the provision of new facilities to aid sport and recreation activities which support a healthy lifestyle.

In addition, minor positive effects have been identified for other policies which would improve the built and natural environments, as well as access to the natural environment, or which would enable/improve the use of healthy travel modes (i.e. walking and cycling), although on the latter the effects will be dependent on the behavioural change necessary to result in a take-up of active travel modes.

At a site-specific level, none of the Sites for Potential Allocation have been identified to have any significant effects (either adverse or positive) against the Health & Wellbeing objective. Minor positive effects have been predicted for those sites which are in close proximity to open space or which would provide new open space, whilst uncertain effects have been identified for sites which could suffer from noise or air quality issues due to their proximity to major roads.

#### 6.4.12 SA11: Sustainable Locations

Significant positive effects against the Sustainable Locations objective have been forecast in relation to the Potential Housing Distribution approach as the prioritising of new development in built-up urban areas should reduce the need to travel, as a large proportion of residents would be close to key services and facilities.

Additional minor positive effects have also been predicted for a wide range of other policies, including, amongst others: ‘Preferred Policy Option 3: Housing Density’ which supports highest density housing at sites which are well served by public transport and close to services and facilities; ‘Preferred Policy Option 7: Employment and Economic Development’ which gives priority to developments in sustainable locations, accessible by foot or public transport from existing settlements; and ‘Preferred Policy Option 26: Sustainable Transport and Travel’ as improving provision of public transport and sustainable travel infrastructure will make developments in the District more accessible.

No adverse effects have been identified in relation to the proposed policies.

For 'Preferred Policy Option 16: Green Belt' the effects are uncertain given that residential developments in land removed from the Green Belt will result in people travelling further for work and leisure purposes which could increase reliance on the car. The impact is dependent on a public transport system being in place to connect new developments to the main settlements.

At a site-specific level, none of the Sites for Potential Allocation have been identified to have any significant effects (either positive or negative) in relation to the Sustainable Location objectives. As was the case for SA4 Climate Change some minor adverse effects have been identified for housing and employment sites which are at a distance from services and facilities. Conversely, minor positive effects have been identified for housing sites which are in close proximity to services and facilities.

#### 6.4.13 SA12: Community Cohesion

The predicted effects of the plan against the community cohesion objective are largely positive. The plan includes policies which would improve access to housing, education, facilities, public transport and would improve quality of life in the District whilst helping to reduce deprivation, where it exists.

Significant positive effects have been identified for 'Preferred Policy Option 10: Social and Community Facilities' and 'Preferred Policy Option 11: Health and Wellbeing' as these policies seek to protect existing social, cultural and community facilities, alongside the provision of enhanced facilities which will be significantly positive for community cohesion.

Additional minor positive effects have also been predicted for a wide range of other policies, including, amongst others: 'Preferred Policy Option 2: Housing Mix and Type' which aims to build mixed communities by providing a mix of affordable, specialist and supported accommodation in addition to a mix of tenures and types of housing; and 'Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation' as the provision of new open space and play space at new developments would be beneficial to local communities.

No adverse effects have been identified in relation to the proposed policies.

For the housing growth element of the plan the effects are uncertain given that making provision for nearly 9,000 new homes over the Local Plan period could result in a cumulative impact by adding pressure on community infrastructure across the District. Conversely, the level of housing growth should result in increased levels of developer contributions which could result in an increased provision of health, education, recreation and community facilities, as well as supporting the viability of existing services and facilities. Effects will vary between area and will also depend on the levels of new infrastructure provided as part of new developments.

At a site specific level, none of the Sites for Potential Allocation have been identified to have any significant effects (either positive or negative) against the Community Cohesion objective, however minor positive effects have been identified for sites close to community facilities and for sites which would provide new community facilities. No minor adverse effects were identified at a site level.

#### 6.4.14 SA13: Housing

Significant positive effects have been predicted in relation to 'Preferred Policy Option 2: Housing Mix and Type', 'Preferred Policy Option 3: Housing Density' and 'Preferred Policy Option 4: Affordable Housing' which ensure that there is a suitable range of types, styles, design and tenure mix to support needs of different groups.



In addition, minor positive effects have been identified for some other policies, including: Preferred Policy Option 5: Provision for Gypsies, Travellers and Travelling Showpeople' as allocation of additional traveller sites and safeguarding of existing sites will ensure that the needs of the travelling community are met; 'Preferred Policy Option 6: Residential Design and Layout and Accessible and Adaptable Buildings' which contributes towards providing affordable and accessible housing in the District; 'Preferred Policy Option 16: Green Belt' which, in special circumstances, would allow residential development to support agricultural and forestry workers; and 'Preferred Policy Option 23: Local Distinctiveness and Place Shaping' which supports high quality design of housing.

The proposed Housing Growth Level is identified as having mixed effects against the housing objective. Whilst this policy supports the provision of nearly 9,000 new homes which will contribute to the District's housing need, the level of housing proposed does not fulfil the District's Objectively Assessed Need for housing over the plan period.

At a site specific level, significant positive effects have been identified in relation to those potential housing allocation sites which have a capacity to support 500 or more dwellings and therefore make a significant contribution towards providing new housing for the District. Minor positive effects have been identified for all housing sites with a dwelling capacity below 500.

The proposed policy on housing allocations in Part 2 of the Regulation 18 Local Plan is also identified as having a significant positive effect on the housing objective.

#### 6.4.15 SA14: Economy and SA15 Employment

The SA has predicted that the Regulation 18 Local Plan would have positive cumulative effects on economic factors. The plan supports the objectives to achieve sustainable levels of prosperity and economic growth and to ensure local residents have access to employment opportunities and training. The plan would enable economic growth in the District by retaining and adding to dedicated employment sites and by enabling appropriate retail and leisure developments in accessible locations which will stimulate the local economy and ensure the viability and vitality of local centres within the District are maintained.

Significant positive effects have been predicted for both of the economic related SA objectives (SA14 and SA15) in relation to 'Preferred Policy Option 7: Employment and Economic Development' and 'Preferred Policy Option 8: Warner Bros. Studios at Leavesden' as these policies contribute to overall employment levels in a diverse range of jobs, in areas accessible to public transport and with mixed use development which would have a significant positive effect on economic growth in the area.

In addition, minor positive effects have been against SA14 and SA15 for other policies, including: 'Preferred Policy Option 9: Retail and Leisure', as through the protection and enhancement of town, district and local centres the policy will help to encourage retail and associated development uses which are appropriate to the scale and function of these centres and which will help to support the vitality of the local economy. Increased development in centrally located and accessible areas will allow the District to grow sustainably. Increasing retail and leisure options within the settlements will help the viability and vitality of local centres; and the policies under the 'Transport and Connections' theme, as measures to maximise the use of active travel modes and public transport should improve the quality of the urban environment thereby supporting the local economy. Reducing congestion should also be beneficial for local businesses as deliveries, customers and employees are less likely to face transport delays. 'Policy Option 28: Deliveries, Servicing and Construction' requires that delivery and servicing arrangements be made for all new developments. This will allow for efficient movement of goods and will increase business efficiency for companies making deliveries.

At a site-specific level, significant positive effects have been identified in relation to Warner Bros Studio at Leavesden expansion sites CFS28 and OSPF6 given the importance of the studio to the local and national economy. These sites would allow expansion of the studio which would contribute significantly to the growth of the creative industry in the District. The existing employment site E(d) Maple Cross/Maple Lodge is also identified as having significant positive effects against these objectives due to its spare capacity of approx. 18,000sqm/5ha of industrial floorspace.

## 6.5 Cross-boundary effects

The effects resulting from housing, employment and other associated growth within Three Rivers will not just be restricted to the District, but some effects could also be felt in neighbouring local authority areas - for example through an increase in traffic or through increased pressure on infrastructure and natural resources with their associated environmental and social impacts.

One specific area of the District where this could particularly be the case is Kings Langley which is partly in Three Rivers District and partly in Dacorum Borough. Any new development in Three Rivers could have effects on the services and facilities which are located in the Dacorum area of the village.

Another potential topic where cross-boundary effects could result is the water environment. Due to the inter-connected nature of the water environment which links many rivers, streams and groundwater, any negative effects on water resources could also be felt in the surrounding areas.

A number of pieces of technical work have been undertaken jointly with other authorities to ensure that cross-boundary issues are assessed, for example employment, Green Belt review, open space, sport and recreation, strategic flood risk assessment (Level 1) and housing studies.

## 6.6 Difficulties Encountered in Undertaking the Assessment

Given the strategic nature of many of the elements of the Regulation 18 Local Plan and the uncertainty in terms of the actual effects that might result from the implementation of the Local Plan policies, there is some uncertainty as to the direction and significance of some 'Policy v. SA objective' relationships. Professional judgement has been used to predict the nature of likely effects and their potential significance. However, a range of uncertainties in the assessment remains and where these uncertainties relate to potentially significant effects, monitoring will be required. The requirement for monitoring will be addressed in the SA Report for the Publication Local Plan – at the Regulation 19 stage.

Whilst the Local Plan can provide the framework for seeking to achieve sustainable development, much will be dependent on whether there are the requisite behavioural changes needed to achieve this goal. For example, the Local Plan can require the integration of sustainable transport measures as part of new development; however, the success of such a requirement is entirely dependent on people changing travel behaviours to make use of such measures. Such a factor means that the SA can never be entirely accurate in the predictions of effects.

## 6.7 Mitigation and Recommendations

### 6.7.1 Introduction

A key role of the SA is to provide recommendations as to how the sustainability performance of a plan can be improved. The Regulation Local Plan includes a range of proposed policies that seek to prevent and where possible enhance the environment and overall sustainability of development.

The SA has built on this by identifying a range of recommendations as to how the Local Plan can maximise its performance against the range of sustainability topics. Some of these recommendations seek to mitigate potential adverse effects, whilst others look to build on some of the opportunities that are provided by the District's natural environment.

### 6.7.2 *Mitigation*

The assessments of the Regulation 18 Local Plan Part 1 in Appendix E have been undertaken on a 'policy by policy' basis, seeking to identify the effects of each policy in isolation – i.e. without considering the potential mitigation and/or enhancements of effects that are included in other policies. As a result many of the potential adverse effects identified in the 'development enabling' plan elements such as the proposed level of housing growth and 'Preferred Policy Option 7: Employment and Economic Development' should be avoided or mitigated by the requirements set out in Preferred Policy Options under the plan themes of 'Sustainable Development'; 'Housing'; 'Employment'; 'Social and Community Facilities / Health and Wellbeing'; 'Climate Change'; 'Green Belt'; 'Environment'; 'Green Infrastructure'; 'Design and Heritage'; and 'Transport and Connections'.

The specific policies which will mitigate potential adverse effects by SA topic area are identified in the relevant sections of the 'Whole Plan Assessment by SA Topic' which is included in Section 6.4.

### 6.7.3 *Recommendations*

During the development of the Regulation 18 Local Plan the SA team have provided a wide range of suggestions and recommendations as to how the policies and supporting text for the Plan could be updated to fill some gaps and to improve the robustness and clarity of the Plan's requirements. This has taken place at various stages, from initial policy development through to finalisation of the Local Plan Regulation 18 consultation.

In addition there are some further recommendations which have been identified for the Council's consideration when the Plan is being updated for the Publication stage. These are in relation to the Local Plan's objectives and preferred policy options, as follows:

- Objective 3 Ensure that new development prioritises and makes best use of previously developed brownfield land (PDL)
  - Whilst this is a good objective to have, given that there is a limited supply of previously developed land in the District, the headline objective would benefit from being expanded so it also refers efficient use of land.
- Objective 4 Ensure that necessary infrastructure and services are integrated within new developments where appropriate.
  - Whilst it is realised that the list of services in the supporting text is not an exhaustive list, it would benefit from also referring to 'community facilities' or 'leisure and recreation'.
- Objective 9 Continue to tackle climate change and reduce the impacts on the environment by encouraging reductions in carbon emissions, waste, pollution, energy and water consumption and promoting the use of renewable energy and sustainable building materials.
  - This objective encompasses a wide range of issues and would benefit from being structured to reflect this, perhaps by having sub-objectives (or supporting text) to cover the topics of Climate change mitigation; Climate change adaptation; resource use; and environmental pollution.

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- Objective 10 Provide opportunities for leisure, arts, sport and recreational activities within the District.
    - The supporting text would benefit from some text covering the “arts” – as referred to in the headline objective.
  - Objective 15 Health and Wellbeing.
    - The headline objective would benefit from being clearer as to what it is aiming to achieve. For example “Improve the health and wellbeing of all Three Rivers’ communities and reduce health inequalities”.
  - Preferred Policy Option 9: Retail and Leisure
    - In relation to point 5f), any retail/leisure development in an out of centre location would inevitably result in some increased private vehicle use and therefore preclude any such developments taking place without contravening policy. This section of the policy would therefore benefit from an update to recognise that some private vehicle use is inevitable, but whilst still aiming to keep such an increase as low as possible.
    - Point 7 would benefit from some clarification as to how losses would be dealt with by the policy. Currently the paragraph is concentrated on how ‘gains’ would be considered, but not ‘losses’.
    - Point 9 could be expanded to also cover frontages and displays associated with the leisure developments .
    - In relation to point 10 and point 11 would there be an issue if one large new supermarket or non-food retail store uses up a whole 5 year target - just in one location? The policy would benefit from some clarification on this issue.
  - Preferred Policy Option 11: Health and Wellbeing
    - The policy would benefit from additional policy text covering issues/topics which are included in the supporting text “Why is this the Preferred Policy Option?”, for example the areas covered by the ‘Hertfordshire Health and Wellbeing Planning Guidance Document (2017)’. Alternatively that document could be cross-referenced in the policy text. For example, a fourth point to the policy could be added encouraging developers/applicants to incorporate the Design Element recommendations from the Hertfordshire Health and Wellbeing Planning Guidance Document (2017) into development proposals.
  - Preferred Policy Option 12: Carbon Dioxide Emissions and On-site Renewable Energy
    - To avoid confusion with other Local Plan policies which also address CO<sub>2</sub> emissions (e.g. Preferred Policy Option 26: Sustainable Transport and Travel), as this policy is restricted in scope to built-development it would be clearer for the policy title to reflect this – for example if the title were to read “Energy efficiency and On-site Renewable Energy”.
  - Preferred Policy Option 14: Renewable and Low Carbon Energy Developments
-

- The policy would benefit from being structured and worded as per the version agreed at the August 2019 Local Plan Sub-Committee<sup>7</sup>.
- Preferred Policy Option 17: Ground Conditions, Contamination and Pollution
  - With regard to the “*must fully assess such impacts*” text in point 7, the Plan would benefit if this principle was also applied to the Air Quality (point 4) and Lighting (point 5) elements of this policy.
- Preferred Policy Option 22: Open Space, Play Space, Sport and Recreation
  - Under point 7 ii), the exclusion relating to specialised accommodation for the elderly could result in the such accommodation having no access to green space/gardens which could play an important role for overall wellbeing of residents. The policy would benefit from further clarification on this issue in order that the residents of this type of accommodation are not disadvantaged in relation to such access.
- Preferred Policy Option 25: Heritage and Historic Environment
  - Point 4 (editorial) – the second reference to “significance” is superfluous.
  - Point 14 would benefit from requiring the ‘setting’ of Locally Important Buildings to also be taken into account.
- Preferred Policy Option 26: Sustainable Transport and Travel
  - Point 1 would benefit from being expanded to also refer to new and future sustainable modes of transport, for example electric scooters.
  - The supporting text for Policy 26 makes reference to safeguarding land for HS2. It would be beneficial to include this within the policy.

It is anticipated that further input and recommendations are provided through the SA process following the consultation on the Regulation 18 Local Plan, through further assessment work and by taking into consideration responses received to the consultation.

## 6.8 Monitoring

The SEA Directive requires that the significant environmental effects of implementing a plan are monitored so that appropriate remedial actions can be taken if required.

The monitoring put in place needs to fulfil the following requirements:

- To monitor the significant effects of the plan;
- To monitor any unforeseen effects of the plan;
- To ensure that action can be taken to reduce / offset the significant effects of the plan; and
- To provide baseline data for the next SA/SEA and to provide a picture of how the environment / sustainability criteria of the area are evolving.

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<sup>7</sup> <https://www.threerivers.gov.uk/meeting/local-plan-sub-committee-thursday-8-august-7pm>

The SEA Directive (Article 10 (1)) allows for existing monitoring arrangements to be used if appropriate. Monitoring may cover several plans or programmes as long as sufficient information about environmental effects is provided for the individual plans or programmes.

At this stage of the Local Plan and SA processes there is uncertainty about the number and the nature of significant or uncertain effects that may result from the implementation of the Local Plan and therefore monitoring measures are not proposed at this stage.

A draft framework of monitoring measures will be introduced in the SA Report to accompany the Regulation 19 Local Plan, with the final framework being included in the SA Statement which will be produced at the Plan Adoption stage.

## 6.9 How the SA has influenced the Plan

To date the SA has had a range of influences on the development of the Local Plan. Close liaison between the planning officers and SA consultants since the scoping stage in 2017 has meant that the SA has provided input at several stages during the development of the Local Plan.

When the Local Plan is adopted it will be accompanied by an SA Adoption Statement which will need to describe how the Local Plan has been influenced by the SA. Influences to date include the following:

- Production of the SA Scoping Report identified issues that the Local Plan needed to help address. The information within the Scoping Report also contributed to the Local Plan evidence base;
- Contributions to the development of the Issues and Options paper during its preparation prior to consultation in summer 2017;
- Production of an SA Working Note to accompany the consultation on the I&O paper;
- Input into the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA). This was a key early input from the SA process as it ensured that the methodology used by TRDC was aligned with the SA Framework at a level appropriate to the early consideration of site options. It also avoided unnecessary duplication of work between the plan making and SA activities, as the SA has drawn from information in the SHELAA rather than having to unnecessarily undertake separate evidence gathering;
- Production of an SA Working Note to accompany the consultation on the Potential Sites;
- Undertaking assessments of the potential sites for inclusion in the Regulation 18 Local Plan Part 2;
- Provision of on-going input in relation to the development of the Regulation 18 Local Plan and its detailed policies and sites; and
- Assessment of the emerging Regulation 18 Local Plan and providing recommendations for additions and changes.

The SA will continue to inform the development of the Local Plan through the future stages of Publication, Submission and Examination.

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## 7 Conclusions and Next Steps

### 7.1 Conclusions and Recommendations

The Preferred Policy Options and Sites for Potential Allocation in Parts 1 and 2 of the Regulation 18 Local Plan have been assessed against the SA Objectives that were developed during the scoping stage of the SA process. In addition, the proposed Local Plan Vision and Objectives have been assessed for their compatibility with the SA objectives.

The SA has found that overall the Regulation 18 Local Plan performs well in relation to the SA objectives, particularly the social and economic objectives through the provision of new homes and employment development although the level of housing growth proposed falls short of meeting the District's objectively assessed needs, thereby reducing the level of positive effects against the housing objective (SA13) than if the need were to be fully met.

Whilst the level of growth proposed in the Local Plan will inevitably require new development on greenfield sites in the Green Belt, with associated adverse effects and pressures on the natural and historic environment, by maximising the levels of development in the existing urban areas the amount of greenfield land needed will be minimised, thereby reducing the scale of these effects. The Sites for Potential Allocation which are located within or at the edge of existing sustainable settlements and which may come forward for development in the future would also help to reduce adverse effects, particularly those relating to transport related issues.

The requirements of the topic specific proposed policies in the Regulation 18 Local Plan (e.g. Preferred Policy Option 21: Biodiversity, Trees, Woodlands and Landscaping) will provide many of the mitigation and enhancement measures to improve the overall sustainability performance of the Local Plan.

### 7.2 Next Steps

Following the Regulation 18 consultation the SA will provide input during the development of the Preferred Options document further work will be undertaken by the Council to develop the Regulation 19 Publication version of the Local Plan, taking into account feedback received through the Regulation 18 consultation. As with all previous stages this process will be informed by the ongoing SA.

When the Local Plan is published at the Regulation 19 stage, planned for late-2021, it will be accompanied by a full SA Report (with a Non-Technical Summary) which will provide a detailed assessment of all the proposed policies and sites in the Publication document and which will fully meet the requirements for an Environmental Report as specified by the SEA Regulations. The SA Report will build on feedback received through the Regulation 18 consultation as well as the additional evidence base studies that are currently being undertaken.

## Abbreviations used

AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
CIL	Community Infrastructure Levy
DPD	Development Plan Document
FZ	Flood Zone
GHG	Greenhouse Gas
GI	Green Infrastructure
GSPZ	Groundwater Source Protection Zone
HRA	Habitats Regulations Assessment
I&O	Issues and Options
LB	Listed Building
LDD	Local Development Document
LNR	Local Nature Reserve
LWS	Local Wildlife Site
NPPF	National Planning Policy Framework
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SHELAA	Strategic Housing and Economic Land Availability Assessment
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TPO	Tree Protection Order



## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

<b>Site CFS6 Land at Mansion House Equestrian Centre</b>		
HCC Growth and Infrastructure	<ul style="list-style-type: none"> <li>• Transport. An agreed access strategy should be developed should this site be taken further. HCC Highways will only support this site if significant sustainable mitigation is provided as outlined above which have been discussed with the developer and transport consultant. HCC Highways has had no contact with the developer and the transport consultant in relation to the site.</li> <li>• It is considered that Public Right of Way No.29 should be recognised and protected.</li> </ul>	
<b>Site CFS26c West of the Kings Langley Estate</b>		
Affinity Water	<ul style="list-style-type: none"> <li>• Site is within or close to SPZ1</li> <li>• Significant mains apparatus within site</li> </ul>	
Dacorum Borough Council	<ul style="list-style-type: none"> <li>• Do not wish to object to principle of allocation;</li> <li>• Concerned about the wider impacts this will have on the wider village falling within the Dacorum area;</li> <li>• Concerns that the proposal will result in an isolated development detached from the rest of the village;</li> <li>• Whilst Kings Langley has potential to grow, Dacorum have sought to limit expansion taking account of historical cross boundary development, pressure on local infrastructure and issues around peak time congestion along the Watford Road;</li> <li>• Concerns regarding additional strain on schooling, where there is a need to work with the County Council to find a settlement wide solution for the village. In regards to this, HCC they made clear there was no identified solution to primary school education deficiency in Kings Langley;</li> <li>• General Road Access to the site is poor, particularly narrow, with additional concerns raised in regard to road access under narrow rail bridges at Toms Lane and Egg Farm Lane;</li> <li>• Dacorum Draft Local Plan includes a number of place strategies for the key settlements, recommend a similar approach in TRDC Local Plan for place making;</li> <li>• Note that Kings Langley Neighbourhood Plan is being progressed and consultation has just finished on this. Kings Langley Parish Council should be acknowledged as a key stakeholder.</li> <li>• We would welcome future cross-boundary involvement with this proposal</li> </ul>	
HCC Growth and Infrastructure	<ul style="list-style-type: none"> <li>• The requirement for a new primary school to be located on this site, is welcomed. The site should be capable of accommodating a primary school up to 3fe, to also support growth proposals in Kings Langley made by Dacorum Borough Council (DBC).</li> </ul>	<ul style="list-style-type: none"> <li>• The Stage 2 Green Belt Review assessed harm to the Green Belt of releasing the wider parcel (in which the site is located) as high.</li> </ul>

## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

	<ul style="list-style-type: none"> <li>• Transport. HCC as Highways Authority have had discussions with the developer and the transport consultant in relation to Site CFS26a (Kings Langley Estate North). HCC Highways will only support this site if significant sustainable mitigation is provided as outlined above which have been discussed with the developer and transport consultant.</li> <li>• Would recommend increasing the size of the development and reducing housing elsewhere in the district in less sustainable locations (e.g. Site EOS12.2 (Land to the west and south of Maple Cross) and Site EOS12.3 (Land to the north of Chalfont Lane)</li> </ul>	<ul style="list-style-type: none"> <li>• SA conclusions- The site is strategic in scale and its development would support a high level of infrastructure provision. It is considered that the strategic advantages of the site justify the high harm to the Green Belt in releasing the site.</li> </ul>
Highways England	<ul style="list-style-type: none"> <li>• Identifies the following sites to have a boundary with or close to the SRN- GT1; EOS4.0; CFS26c; GT4; P39; EOS7.0 and EOS12.2. For these sites, there will be an added level of requirements for Highways England which are likely to include issues regarding ground conditions, drainage, lighting, noise and vibration, in addition to cumulative traffic impacts</li> <li>• There are other draft allocated sites that are of a significant scale, and whilst these sites may not be positioned close to the SRN, they are likely to generate a level of traffic that could impact on the operation and safety of the SRN. This will only be known the from traffic modelling and assessment work that will need to be submitted as part of a future Local Plan evidence base.</li> </ul>	<ul style="list-style-type: none"> <li>• Traffic modelling and assessment work that will need to be submitted as part of a future Local Plan evidence base.</li> </ul>
Natural England	<ul style="list-style-type: none"> <li>• Advice for developments of 100+ dwellings within the Zone of Influence of Chilterns Beechwoods Special Area of Conservation (SAC). Footprint Ecology Report concluded that there are likely significant effects upon the integrity of the SAC from the upcoming Local Plan and future Local Plans from LPAs surrounding the SAC, and subsequently identified a 12.6km Zone of Influence (ZOI) around the site.</li> <li>• The evidence suggested that Three Rivers District Council contributed less than 2% of visits to the SAC. As a result, they were not included as part of the strategic solution (where mitigation is required for all developments resulting in a net increase in dwellings).</li> <li>• It is noted that some of the proposed allocated sites EOS4.0 and CFS26c are within the Zone of Influence (<u>Chilterns Beechwoods Special Area of Conservation</u> (<a href="http://dacorum.gov.uk">dacorum.gov.uk</a>)). For larger developments that fall within the ZOI and result in a net increase of &gt;100 dwellings we recommend further consultation with Natural England to determine the recreational impacts and any requirement for mitigation measures.</li> <li>• Mitigation is likely to involve contributions towards a Strategic Access Management and Monitoring (SAMM) strategy, as well as the provision of Suitable Alternative Natural Greenspace (SANG). Where SANG is proposed, this should be delivered at a minimum standard of 8 ha / 1000 population. It should also be secured in perpetuity and agreed with the respective Local Planning Authority and Natural England.</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing discussion with Natural England to discuss mitigation measures should sites EOS4.0 and CFS25c be allocated for development.</li> </ul>

## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

Kings Langley Parish Council	<ul style="list-style-type: none"> <li>• Objection to allocation.</li> <li>• TRDC site assessment acknowledged this land is in agricultural use and the damage to the Green Belt would be high since it makes a significant contribution to it. The Green belt forms a strategic gap between Hemel, Kings Langley, Abbots, and Watford. The TRDC’s own assessment states the site retains a strong openness and distinction from urbanising uses in Kings Langley. In summary, it is concluded that impact of development on adjacent Green Belt – which was also considered for development - would be “significant”. In addition, the overall harm to Green Belt purposes from release of the land would be “high”.</li> <li>• The location includes a Local Wildlife Site (LWS), which is considered of substantive nature conservation value in making an important contribution to local ecology. There are also numerous rights of way for local people to enjoy.</li> <li>• For potential residents and school children, the proposed development of houses and a primary school would experience continuous noise, light and air pollution from the M25; a study in The Lancet found 19% of childhood asthma cases were caused by traffic and the effects were particularly harmful upon primary school age children.</li> <li>• Access - the only access is from Egg Farm Lane which is a single-track farm road; widening this road would mean widening the railway bridge. The proposal includes further vehicle access from Toms Lane where it narrows as it descends towards the railway. The volume of traffic generated by 893 houses and a primary school, especially at peak hours, would lead to an unsustainable level of congestion along Toms Lane, Station Road and Primrose Hill which are heavily used by private and commercial traffic.</li> <li>• TRDC should acknowledge that this site on the sloping, eastern side of the Gade Valley would be a highly visible eyesore for miles around.</li> <li>• The size of the proposed development is disproportionate to the location at the very edge of TRDC and its proximity to Kings Langley village.</li> </ul>	
<b>Site CFS8d Notley Farm (combined)</b>		
Historic England	<ul style="list-style-type: none"> <li>• Impact uncertain. An HIA may be helpful to confirm suitability.</li> </ul>	
Dacorum Borough Council	<ul style="list-style-type: none"> <li>• Site falls within the 12.6km zone of influence of the Beechwoods Special Area of Conservation (SAC). See Natural England Guidelines.</li> <li>• Include Kings Langley Parish Council, as a key stakeholder</li> <li>• Kings Langley Neighbourhood Plan was formally adopted by Dacorum Borough Council on 18 January 2023.</li> </ul>	

## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

Thames Water	<ul style="list-style-type: none"> <li>The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan.</li> <li>On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s.</li> </ul>	
Environment Agency	<ul style="list-style-type: none"> <li>The site falls within SPZ1 and therefore protection of groundwater must be considered.</li> </ul>	
Abbots Langley Parish Council	<ul style="list-style-type: none"> <li>Object to site</li> <li>Concerns over building in the Green Belt</li> <li>Development of this site plus site EOS4.0 would constitute over development of Abbots Langley</li> <li>If site EOS4.0 were removed from consideration, we would support use of site CFS8d if the North boundary were reduced to avoid urban sprawl</li> </ul>	
Kings Langley Parish Council	<ul style="list-style-type: none"> <li>TRDC site assessment acknowledges land is in agricultural use and damage to the Green Belt would be high as it makes a significant contribution to it; site would result in the merger of the gap (physical and visual merger of the gap) and concludes impact on Green Belt openness would be significant;</li> <li>Concerns over Local Wildlife Site; ROW; potential noise, light and air pollution from M25;</li> <li>Concerns over access from Egg Farm Lane a single-track farm road; volume of traffic likely to be generated by this significant development leading to unsustainable levels of traffic congestion;</li> <li>Size of the proposed development is disproportionate to the location at edge of TRDC and proximity to Kings Langley Village</li> </ul>	
HCC Growth and Infrastructure	<p><b>Transport</b></p> <ul style="list-style-type: none"> <li>Clarification over off-site links for all transport modes are needed. East Lane and Woodside Road present significant, if not fundamental policy and technical challenges.</li> <li>The level of services and facilities serving the local area is not extensive and demonstrating how this allocation could be considered sustainable in a transport context is likely to be challenging.</li> <li>Should adjoining sites be allocated within the emerging local plan, all the sites allocated in the local area should be controlled by a single policy that secures high levels of permeability for sustainable modes, such as a comprehensive masterplanning approach.</li> <li>The green space allocation will need an on-site specific policy, and clarification around intended users.</li> </ul>	

## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

	<ul style="list-style-type: none"> <li>Significant clarification, policy and technical work is required, in order to make this an acceptable allocation within the emerging local plan. At this stage, it is unclear how the site can meet the requirements of the NPPF, policies of the emerging local plan or HCC's LTP.</li> </ul>	
Natural England	<ul style="list-style-type: none"> <li>Review of the additional sites indicates that at least 4 of these allocations, namely NSS10: Land at Mill Place, Hunton Bridge; CFS26e: Kings Langley Estate South; NSS14: Margaret House, Abbots Langley and CFS8d: Notley Farm, Abbots Langley appear to trigger NE's SSSI Impact Risk Zones for residential development. These are likely to require consultation with Natural England.</li> <li>Recommends further consultation with Natural England to determine the recreational impacts and any requirement for mitigation measures for developments of 100+ dwellings within the Zone of Influence of Chilterns Beechwoods Special Area of Conservation (SAC).</li> <li>The mitigation is likely to involve contributions towards a Strategic Access Management and Monitoring (SAMM) strategy, as well as the provision of Suitable Alternative Natural Greenspace (SANG). Where SANG is proposed, this should be delivered at a minimum standard of 8 ha / 1000 population. It should also be secured in perpetuity and agreed with the respective Local Planning Authority and Natural England.</li> </ul> <p><b>LEADS – Ecology.</b> None known</p> <p><b>LEADS – Historic Environment</b></p> <ul style="list-style-type: none"> <li>This site includes, or has the potential to include, heritage assets with archaeological interest. However, depending upon the number of dwellings proposed within this potential allocation, it is not considered that this will be a constraint, provided appropriate mitigation is in place within the emerging local plan and through the imposition of planning conditions, should a planning application be submitted and approved.</li> </ul> <p><b>Lead Local Flood Authority (LLFA)</b></p> <ul style="list-style-type: none"> <li>Drainage and flood risk- this site could be appropriate for allocation, if the appropriate measures are properly considered, along with national and local policy being taken into account.</li> </ul> <p><b>Public Rights of Way (PRoW)</b></p> <ul style="list-style-type: none"> <li>Should the site be allocated, and a subsequent planning application is submitted, it is likely that a contribution is required to improve local routes to enable active travel (pedestrian) and support the predicted increased recreational use.</li> </ul>	

## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

<b>Site PCS21 Land at Love Lane</b>		
Historic England	<ul style="list-style-type: none"> <li>Site is not justified from a historic environment perspective.</li> <li>Heritage Impact Assessment required prior to allocation to confirm the suitability of the site, to determine its extent and capacity, and to inform any development criteria that may be required in order to avoid or mitigate any harm identified</li> </ul>	Representations by Historic England to be taken into consideration.
Dacorum Borough Council	<ul style="list-style-type: none"> <li>Working in partnership with St Albans, HCC, and Crown Estate to bring forward major proposals involving northern and eastern expansion of Hemel Hempstead;</li> <li>Would be sensible to explore potential cross-boundary linkages between the project and growth in/ around Bedmond and along roads connecting to Hemel Hempstead</li> </ul>	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.
HCC Growth and Infrastructure	<ul style="list-style-type: none"> <li>Site is located adjacent to Site CFS6 (Land at Mansion House Equestrian Centre) and as such it would be better if both sites are considered together particularly in relation to constraints associated with Love Lane. HCC Highways will only support this site and CFS6 (either site, alone or together going forward) if significant sustainable mitigation is provided.</li> <li>The proposed vehicular access from Love Lane onto Tibbs Hill Road / Bedmond Road is likely to be unsuitable due to current width / ownership constraints. As with site CFS6, Love Lane may require improvement if it is planned as a main pedestrian route.</li> <li>Transport. An agreed access strategy should be developed should this site be taken further. HCC Highways have had no contact with the developer and the transport consultant in relation to the site.</li> <li>Site is located next to Site EOS4.0 (Land adjacent to Bedmond Road and South of M25), Site CF56 (Land at Mansion House Equestrian Centre) and Sites CFS8a, b and c (Notley Farm, Bedmond Road) that are no longer being taken forward as part of the Local Plan. It would be better if these sites are considered together to overcome highlighted constraints.</li> </ul>	Noted. HCC Representation will be taken into consideration when refining site allocations at Regulation 19.
<b>Site EOS4.0 Land adjacent to Bedmond Road &amp; South of M25</b>		
Historic England	<ul style="list-style-type: none"> <li>At present this site is not justified from a historic environment perspective.</li> <li>Heritage Impact Assessment required prior to allocation to confirm the suitability of the site, to determine its extent and capacity, and to inform any development criteria that may be required in order to avoid or mitigate any harm identified</li> </ul>	
Dacorum Borough Council	<ul style="list-style-type: none"> <li>Working in partnership with St Albans, HCC, and Crown Estate to bring forward major proposals involving northern and eastern expansion of Hemel Hempstead;</li> <li>Would be sensible to explore potential cross-boundary linkages between the project and growth in/ around Bedmond and along roads connecting to Hemel Hempstead</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing DTC discussions with DBC regarding cross-boundary issues.</li> </ul>

## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

<p>HCC Growth and Infrastructure</p>	<ul style="list-style-type: none"> <li>• <b>Children’s Services</b> (Early Childhood Services). There is currently childcare provision available in area; therefore, impact on this will be minimal. Any comments in relation to this site would be covered by the allocation at Woodside Road, especially if the extension into CFS3 can be secured.</li> <li>• <b>Transport.</b> Transport- Access: There is no existing vehicular access onto the site. HCC Highways have stated that it is unclear how a suitable access strategy could be delivered and that Lavrock Lane and All Saints Lane are not publicly maintained highways and therefore it is unlikely that access could be taken from these roads. HCC Highways also stated that access from the A412 would be extremely complex and would have a significant impact on the viability of the site.</li> <li>• HCC as Highways Authority has had discussions with the developer and the transport consultant in relation to the site in conjunction with sites CFS8a, b and c (Notley Farm, Bedmond Road) to the south. These discussions have been very general and have focused primarily on development coming forward on Sites CFS8a, b and c (Notley Farm, Bedmond Road).</li> <li>• It is suggested that a joint approach for policy and master planning with sites EOS4.0, PCS21 and CFS6 is potentially considered, with a joint master planning policy possibly presenting the best design and access opportunities for all three sites.</li> </ul>	<ul style="list-style-type: none"> <li>• The site is located in the Green Belt. The site is located in two parcels that were assessed in the Stage 2 Green Belt Review. Harm to the Green Belt of releasing the wider parcel (in which the western part of the site is located) was assessed as high.</li> <li>• Harm to the Green Belt of releasing the parcel (in which the eastern portion of the site is located) was assessed as moderate.</li> <li>• <u>The SA concludes this site is not suitable, available, or achievable.</u></li> </ul>
<p>Highways England</p>	<ul style="list-style-type: none"> <li>• Identifies the following sites to have a boundary with or close the SRN- GT1; EOS4.0; CFS26C; GT4; P39; EOS7.0 and EOS12.2. For these sites, there will be an added level of requirements for Highways England which are likely to include issues regarding ground conditions, drainage, lighting, noise and vibration, in addition to cumulative traffic impacts</li> <li>• There are other draft allocated sites that are of a significant scale, and whilst these sites may not be positioned close to the SRN, they are likely to generate a level of traffic that could impact on the operation and safety of the SRN. This will only be known the from traffic modelling and assessment work that will need to be submitted as part of a future Local Plan evidence base.</li> </ul>	<ul style="list-style-type: none"> <li>• Traffic modelling and assessment work that will need to be submitted as part of a future Local Plan evidence base.</li> </ul>
<p>Natural England</p>	<ul style="list-style-type: none"> <li>• Advice for developments of 100+ dwellings within the Zone of Influence of Chilterns Beechwoods Special Area of Conservation (SAC). Footprint Ecology Report concluded that there are likely significant effects upon the integrity of the SAC from the upcoming Local Plan and future Local Plans from LPAs surrounding the SAC, and subsequently identified a 12.6km Zone of Influence (ZOI) around the site.</li> <li>• The evidence suggested that Three Rivers District Council contributed less than 2% of visits to the SAC. As a result, they were not included as part of the strategic solution (where mitigation is required for all developments resulting in a net increase in dwellings).</li> </ul>	<ul style="list-style-type: none"> <li>• Ongoing discussion with Natural England to discuss mitigation measures should sites EOS4.0 and CFS25c be allocated for development.</li> </ul>

## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

	<ul style="list-style-type: none"> <li>It is noted that some of the proposed allocated sites EOS4.0 and CGS25c are within the Zone of Influence (<u>Chilterns Beechwoods Special Area of Conservation</u> (<a href="http://dacorum.gov.uk">dacorum.gov.uk</a>)). For larger developments that fall within the ZOI and result in a net increase of &gt;100 dwellings we recommend further consultation with Natural England to determine the recreational impacts and any requirement for mitigation measures.</li> <li>Mitigation is likely to involve contributions towards a Strategic Access Management and Monitoring (SAMM) strategy, as well as the provision of Suitable Alternative Natural Greenspace (SANG). Where SANG is proposed, this should be delivered at a minimum standard of 8 ha / 1000 population. It should also be secured in perpetuity and agreed with the respective Local Planning Authority and Natural England.</li> </ul>	
<p><b>Site OSPF22 Batchworth Golf Course</b></p>		
Historic England	<ul style="list-style-type: none"> <li>Concerns about the potential allocation of sites OSPF22 and CFS59. This land provides part of the rural setting for Moor Park, and filling-in this open land with new development has the potential to cause a moderate to high level of harm to this highly designated landscape.</li> <li>A Heritage Impact Assessment should be undertaken to consider the suitability of the site for development in terms of the impact upon the historic environment and also, if the site is found suitable, recommends appropriate mitigation which should then be incorporated into Policy.</li> <li>Given the scale and relative complexity of development proposed, advises that a masterplanning exercise / Concept Framework is carried out prior to a planning application being submitted and determined. This work should be informed by and reflect the findings of the detailed HIA, and again this should be stipulated in policy.</li> </ul>	
Sport England	<ul style="list-style-type: none"> <li>Objects to potential allocation</li> <li>Playing Pitch Strategy concluded existing supply of golf facilities including Batchworth can meet current and future demands (any loss of a facility would mean that existing provision would not meet needs)</li> <li>Playing Pitch Strategy specifically recommends 'Retain course and sustain quality through appropriate maintenance. Explore opportunities to increase membership.'</li> <li>If proposed for development, it will need to comply with paragraph 99 of the NPPF in relation to the loss of sports facility provision.</li> <li>if this site is to be considered for allocated for residential following this consultation, the following course of action is recommended: Before a decision is made about allocating the site, an <b>objective golf facility needs assessment</b> (as advised in the Playing Pitch Strategy) should be prepared which assesses local golf facility needs in detail to identify whether there are adequate alternative similar golf facilities in the local area that could meet the demand that this facility currently provides for.</li> </ul>	<ul style="list-style-type: none"> <li>Noted. The site is in multiple ownership. Three Rivers District Council owns a proportion of the site (Sandlefield Spring and The Grove) and is not promoting these areas for development.</li> <li>The site is located in the Green Belt. The site falls into three parcels assessed in the Stage 2 Green Belt Review. Release of the parcel (in which the majority of the site is located, to the north) was assessed as leading to high harm to the Green Belt. Areas of the site to the east, along London Road (Site CFS59 and the area of the clubhouse, car park and Batchworth Hill</li> </ul>



## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

		<p>House), were assessed as leading to moderate-high harm to the Green Belt if released. The remainder of the site, to the south and along the western boundary, were not assessed in the Stage 2 Green Belt Review; the Stage 2 Green Belt Review states that the release of any land outside the assessment area would result in at least high harm to the Green Belt.</p> <ul style="list-style-type: none"> <li>• The SA assessment concludes the site is not suitable and part of the site may be deliverable.</li> <li>• The Councils Playing Pitch strategy 2018 concluded that the current supply of golf facilities in Three Rivers district (including this site), can meet current and future demand. In anticipation that some golf courses may be promoted as local plan development allocations, the strategy's action plan (page 28) made it clear there is a need to carry out a full golf facility needs assessment.</li> </ul>
Affinity Water	<ul style="list-style-type: none"> <li>• Sites within or close to SPZ1 need to take into consideration Environment Agency guidance.</li> </ul>	
Batchworth Community Council	<ul style="list-style-type: none"> <li>• States that the Batchworth Park Golf Club have a long lease on the property to 2096 and are opposed the development – that development can't go ahead unless members agree</li> <li>• Concerns about the Scale of development, increase in traffic and congestion (London Rd, Moor Lane, Riverside Drive, Harefield Rd, Sherfield Avenue, Harefield Rd, and wider area), flooding, sewerage system capacity, and wildlife.</li> <li>• Secondary school provision and open spaces already oversubscribed in Rickmansworth.</li> </ul>	<ul style="list-style-type: none"> <li>• Noted. It is in the landowner's remit to deal with issues relating to the current lease. They would have to demonstrate that the land was deliverable within the Plan period.</li> <li>• HCC as the education authority are responsible for provision of schools.</li> </ul>
HCC Growth and Infrastructure	<ul style="list-style-type: none"> <li>• An agreed access strategy should be developed for this site, in order for it be taken further, including an understanding of constraints in the local network for all modes, existing provision, severance and safety issues.</li> <li>• Any new vehicle access onto the A404 requires specific engagement with HCC and should be conducted prior to the site progressing.</li> </ul>	

## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

	<ul style="list-style-type: none"> <li>The indicative masterplan does not demonstrate provision of walking and cycling routes on the shortest/most efficient desire lines to services and facilities and the local network lacks suitable walking and cycling infrastructure to realistically enable cycling journeys to be made across the existing settlement.</li> <li>Public transport would need substantial bus service improvement contributions and the site is currently remote from existing services. The shape of site is considered not to be that good for bus operations, with limited frontage onto A404 (would have to be a loop to ensure dwellings within recommended 400m walking distance of a bus stop). This would be critical in accessing facilities and rail services within Rickmansworth.</li> </ul>	
<b>Site CFS59 Land on London Road, Rickmansworth</b>		
Historic England	<ul style="list-style-type: none"> <li>A Heritage Impact Assessment should be undertaken which considers the suitability of the site for development in terms of the impact upon the historic environment and also, if the site is found suitable, recommends appropriate mitigation which should then be incorporated into Policy.</li> <li>Advise that a masterplanning exercise / Concept Framework is carried out prior to a planning application being submitted and determined, given the scale and relative complexity of site.</li> <li>This work should be informed by and reflect the findings of the detailed HIA, and again this should be stipulated in policy.</li> </ul>	
Batchworth Community Council	<ul style="list-style-type: none"> <li>Objections- too many houses for the plot. Overdevelopment- site is next door to the proposed 619 house site and also leads down to the 60-dwelling site at the bottom of London Road.</li> <li>Concerns over flooding, traffic, and pollution on London Road.</li> </ul>	
HCC Growth and Infrastructure	<ul style="list-style-type: none"> <li>The proposed use as a residential care home is not the optimal usage for this site, a new nursing care home is being delivered in the district by HCC and the units delivered here align with the proposed increase in demand of nursing care.</li> <li>Transport- Recognition of site OSPF22 should be made if both sites are allocated forward.</li> </ul>	
<b>Site EOS7.0 Land to the south of Shepherds Lane and west of the M25</b>		
Affinity Water	<ul style="list-style-type: none"> <li>Site is within or close to SPZ1</li> <li>Significant mains apparatus within site</li> </ul>	
Denham Parish Council	<ul style="list-style-type: none"> <li>Concern about the traffic generated from the site will be transiting along the A412</li> </ul>	
HCC Growth and Infrastructure	<ul style="list-style-type: none"> <li>As this is a large development site, HCC would use this opportunity to promote older persons accommodation scheme within the wider development.</li> </ul>	

## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

	<ul style="list-style-type: none"> <li>• There is no childcare provision in the vicinity of the development; however, the requirement for a new primary school to be located on this site, as stated within the supporting text, is welcomed</li> <li>• An agreed access strategy should be developed, should this site be taken further including an understanding of constraints in the local network for all modes, existing provision, severance and use of the existing network and associated junctions. Bus stops closest to the site only have limited services available. There could be potential for a service extension into the site, although this would need further investigation and substantial developer contributions to facilitate.</li> </ul>	
Highways England	<ul style="list-style-type: none"> <li>• Identifies the following sites to have a boundary with or close the SRN- GT1; EOS4.0; CFS26C; GT4; P39; EOS7.0 and EOS12.2. For these sites, there will be an added level of requirements for Highways England which are likely to include issues regarding ground conditions, drainage, lighting, noise and vibration, in addition to cumulative traffic impacts</li> <li>• Concerns about the cumulative impact of other developments on the SRN.</li> </ul>	<ul style="list-style-type: none"> <li>• Traffic modelling and assessment work will need to be submitted as part of a future Local Plan evidence</li> </ul>
<b>Site CFS18b Hill Farm, Stag Lane</b>		
Affinity Water	<ul style="list-style-type: none"> <li>• Site is within or close to SPZ1</li> <li>• Significant mains apparatus within site</li> </ul>	
Thames Water	<ul style="list-style-type: none"> <li>• The scale of development/s is likely to require upgrades to the wastewater network.</li> <li>• Local Planning Authority should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan</li> </ul>	
Chorleywood Parish Council	<ul style="list-style-type: none"> <li>• Concerns about site suitability due to presence of PRW, open space and biodiversity importance- Without this corridor the biodiversity and ecological sustainability of Warings Field will be significantly negatively impacted.</li> <li>• Map omits two PRWs</li> <li>• Site is at least a 25-minute walk to the nearest services and facilities using very steep roads. Therefore, this site cannot be categorised as a “Sustainable Location” under SA11.</li> <li>• Site CFS18b ii) has been evaluated to make a significant contribution to the Green Belt with release for development having a Moderate / High Impact on the overall Green Belt. This latter evaluation is considered to be incorrect as it ignores one of the five key purposes of Green Belt defined by the NPPF – “to preserve the setting and special character of historic towns”.</li> </ul>	<p>Noted. National policy allows for reviewing Green Belt boundaries to accommodate growth where exceptional circumstances have been demonstrated. The Council has:</p> <ul style="list-style-type: none"> <li>• Reviewed the housing densities and capacities of all potential sites located within settlement boundaries</li> <li>• Applied a significant uplift in the average density of residential development</li> <li>• Assessed the utilisation of local vacant housing stock</li> <li>• Reviewed the achievability and deliverability of Three Rivers’ own land assets.</li> <li>• Contacted owners/occupiers of potential brownfield sites who had not yet submitted any of their land holdings, and</li> </ul>

## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

		<ul style="list-style-type: none"> <li>• Contacted neighbouring authorities about accommodating unmet need.</li> </ul>
HCC Growth and Infrastructure	<ul style="list-style-type: none"> <li>• Variations of the site have been discussed but of a different scale. The new scale will require clarification in terms of any previously explored mitigation measures as the surrounding highway network has a range of constraints that could impact delivery.</li> <li>• There are bus services that run along Stag Lane and Long Lane, but these are extremely limited, and these roads are generally not suitable for bus operation. This site is not large enough to facilitate service improvements for an adequate period or generate patronage that would make any such improvements viable in the long term.</li> </ul>	
<b>Site EOS12.2 Land to the west and south of Maple Cross</b>		
Historic England	<ul style="list-style-type: none"> <li>• While development of the site appears feasible, we recommend the preparation of Heritage Impact Assessment (HIA) to inform the masterplanning of the site. This work should be informed by and reflect the findings of the detailed HIA, and this should be stipulated in policy.</li> </ul>	
Affinity Water	<ul style="list-style-type: none"> <li>• Site is within or close to SPZ1</li> </ul>	
Denham Parish Council	<ul style="list-style-type: none"> <li>• Concerned about the scale and timing of development (1778 houses in the first 10 years of plan) in addition to EOS7.0 in Mill End a total of 2500 new houses. Requests that the scale of development is reduced in terms of housing and timeframe of delivery spread over a longer period</li> <li>• Unreasonable to put development in one area and requests that development is spread across the wider TRDC area</li> <li>• Concern about further congestion and pollution on the A412 which is the main road and highly congested due to M25</li> </ul>	<ul style="list-style-type: none"> <li>• The site is strategic in scale and would provide supporting infrastructure. This includes: a primary education extension to Maple Cross JMI and Nursery School, parkland (including play space), a local centre including local shops, community facilities, a nursery and flexible commercial space, a 90-bed extra care home, improved bus stops and an extended bus route through the site as well as pedestrian and cycle routes.</li> <li>• Proposed development site has been selected through the SHELAA process and cannot be proportioned across the settlements equally due to limited sites within TRDC to meet future housing needs. Whilst the extension to Maple Cross is substantial there are other major sites proposed across the District.</li> <li>• The timescales for delivery take account of the Council's SHELAA and are considered</li> </ul>

## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

		<p>to be reasonable and based on realistic assumptions.</p> <ul style="list-style-type: none"> <li>Traffic and congestion are an issue in the area and comments from Hertfordshire Highways will be considered as well as the findings from the Transport Assessment which will include looking at the A412.</li> </ul>
Chalfont St Peter Parish Council	<ul style="list-style-type: none"> <li>Concerns over adverse effect of site allocation on biodiversity and health and wellbeing of residents.</li> </ul>	
Buckinghamshire Council	<ul style="list-style-type: none"> <li>Site allocations close to the Buckinghamshire boundary- the potential impacts of development sites at Maple Cross were referred to in the response of Chiltern and South Bucks Councils to the Three Rivers DC Call for Sites consultation (19.12.2018). There was a request from Chiltern and South Bucks Councils that the authorities worked together to address potential traffic and infrastructure impacts as these were a particular concern at the time. The site references were CFS 34A, CFS34 and CFS 32. The consultation documents do not make clear how traffic impacts may be mitigated.</li> <li>Transport modelling-Buckinghamshire Council would like to be involved in this and consider its results, for example proposed mitigations to address cross – boundary impacts.</li> <li>Site EOS12.2 will also be required to provide primary education, bus stops, an extended bus route and GP facilities. This is welcomed as it will help deal with the infrastructure impacts of these proposals.</li> </ul>	<ul style="list-style-type: none"> <li>Ongoing DTC discussions with HCC Transport and Buckinghamshire Council on cross-boundary issues.</li> </ul>
HCC Growth and Infrastructure	<ul style="list-style-type: none"> <li>HCC welcomes the inclusion of a care home within the supporting text for this site.</li> <li>The education requirement is expected to be more than an extension to the existing Maple Cross JMI. The tiered approach indicates that 1,500 residential units on a tier 1 site would mean an additional 3.75fe of additional pupil yield. Sites EOS12.3 and CFS31 would add an additional 231 dwellings / ~0.5fe to those totals. HCC therefore considers that a more acceptable approach will be to allocate a site for a new 3fe primary school within this potential housing site allocation, along with the land to facilitate expansion of Maple Cross JMI.</li> <li>Transport. Discussions between the developer and HCC as Highways Authority have taken place, regarding the work that may need to be undertaken, in order to achieve a LTP4 compliant site should this site be allocated within the emerging local plan.</li> <li>HCC Highways will only support this site if significant, sustainable mitigation is provided as outlined above which has been discussed with the developer and transport consultant.</li> </ul>	

## Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

	<ul style="list-style-type: none"> <li>HCC would recommend exploring reducing the size of the site and providing additional housing elsewhere in the district in more potentially sustainable locations.</li> </ul>	
Highways England	<ul style="list-style-type: none"> <li>Identifies the following sites to have a boundary with or close the SRN- GT1; EOS4.0; CFS26C; GT4; P39; EOS7.0 and EOS12.2. For these sites, there will be an added level of requirements for Highways England which are likely to include issues regarding ground conditions, drainage, lighting, noise and vibration, in addition to cumulative traffic impacts</li> <li>Concerns over other draft allocated sites that are of a significant scale, and whilst these sites may not be positioned close to the SRN, they are likely to generate a level of traffic that could impact on the operation and safety of the SRN. This will only be known the from traffic modelling and assessment work that will need to be submitted as part of a future Local Plan evidence base.</li> </ul>	<ul style="list-style-type: none"> <li>Need to undertake further traffic modelling and assessment work to inform local plan evidence base.</li> </ul>

## Appendix 6 – Summary of Strategic Sites / Main Issues Raised – General Public

<b>Site CFS6 Land at Mansion House Equestrian Centre</b>	
<b>For</b>	<ul style="list-style-type: none"> <li>• Yes. Support redevelopment of a derelict site.</li> <li>• Herts &amp; Middx Badger Group / Herts Wildlife Monitors – no issues</li> </ul>
<b>Against</b>	<ul style="list-style-type: none"> <li>• Objections to loss of Green Belt and the progressive eroding of the boundaries.</li> <li>• Questions justification for inclusion when other far less rural and key sites elsewhere in the district are available, especially as this site represents a high quality rural Green Belt buffer between north Watford and St Albans.</li> <li>• Objections to loss of wildlife, Skylarks (on the RSBP red list), swallows, house martins, swifts, yellow hammers, meadow pipits, kites, buzzards, sparrowhawks, kestrels, owls, partridges, badgers, foxes, roe deer and muntjac deer, stoats, and it also contains some well - established ancient hedgerows which provide habitat for many of the above.</li> <li>• Objections to loss of agricultural land, public rights of way and Local Wildlife Site (LWS), which is an area of substantive nature conservation value which makes an important contribution to local ecology.</li> <li>• Objections the need for more homes, given that the local population has decreased as EU workers have returned home due to Brexit and Covid.</li> </ul>
<b>Site CFS26c West of the Kings Langley Estate</b>	
<b>For</b>	<ul style="list-style-type: none"> <li>• Yes. Minimal impact on existing residents, plenty of land</li> </ul>
<b>Against</b>	<ul style="list-style-type: none"> <li>• Objections to the site's location adjacent to the M25, impact of noise, light and air pollution and increased traffic.</li> <li>• Objections to a primary school close to the M25 and its impact on children's health.</li> <li>• Objections to loss of agricultural use, public rights of way throughout the site and nature conservation due to the Local Wildlife Site (LWS), which makes an important contribution to local ecology.</li> <li>• Herts Wildlife Monitors – there are issues regarding protected species on the eastern side of this proposed site; we would therefore object in part to this site.</li> <li>• Herts &amp; Middx Badger Group – issues regarding protected species, we would be objecting in part to this site.</li> <li>• Objects to loss of Green Belt – development spoiling the rural appearance of the area and would take a large step towards making Kings Langley, Abbots Langley and Watford an uninterrupted conurbation. Urban sprawl would be unavoidable and the villages of Kings Langley, Abbots Langley, Bedmond and Nash Mills would coalesce into a town.</li> <li>• Have all Brownfield sites been explored?</li> <li>• KL&amp;DRA – The Association does not dispute that there is a need to provide for future housing requirements, but these should be proportionate to the characteristics of the local community. Objects and expressed concerns about the potential effects of development to the east of the village on the settlement as a whole. Although the overall amount of housing has been reduced in the New Local Plan (Part 1 Preferred Policy Options), the scale and size of the proposed development on site CFS26c would see an increase of more than 40% in numbers of dwellings counted in the 2011 Census. Clearly, this is disproportionate to the size and function of Kings Langley, most of which lies to the west of the Grand Union Canal.</li> </ul>

## Appendix 6 – Summary of Strategic Sites / Main Issues Raised – General Public

	<ul style="list-style-type: none"> <li>• Objection to the cumulative impact of development. The TRDC assessment takes no account of the significant level of development that has recently taken place, and is still taking place, along the canal corridor between Hyde Lane and Abbots Road, already placing unreasonable burdens on local infrastructure and services.</li> <li>• Objections to the impact on the open environment of the Gade valley</li> <li>• Objections to out-of-date studies, all pre COVID era stuff from 2014.</li> </ul>
<b>Site CFS8d Notley Farm (combined)</b>	
<b>For</b>	<ul style="list-style-type: none"> <li>• Supports development of site</li> </ul>
<b>Against</b>	<ul style="list-style-type: none"> <li>• Object to building on Green Belt land</li> <li>• Concerns about infrastructure provision, especially schools, nursery schools and medical facilities</li> <li>• Concerns about damage and loss to the natural environment, trees, old native hedgerows, agricultural land, biodiversity and wildlife.</li> <li>• Concerns over loss of access to green space e.g., Leavesden Country Park for the public.</li> <li>• Concerns about increased traffic</li> <li>• Focus should be on redeveloping disused sites, e.g. shops / offices</li> <li>• Suggests empty “second homes” should be used for local people</li> </ul>
<b>Site PCS21 Land at Love Lane</b>	
<b>For</b>	<ul style="list-style-type: none"> <li>• Supports suitable site subject to access</li> </ul>
<b>Against</b>	<ul style="list-style-type: none"> <li>• Herts &amp; Middx Badger Group – objection there is an issue regarding protected species on this site.</li> <li>• Herts Wildlife Monitors – issue regarding protected species, objection.</li> <li>• Objections to loss of Green Belt, progressive nibbling away of Green Belt and coalescence of Green Belt especially as this site represents a high quality rural Green Belt buffer between north Watford and St Albans.</li> <li>• Development should be limited to Brownfield sites only. Questions justification for inclusion when other far less rural and key sites elsewhere in the district are available.</li> <li>• Objections to overdevelopment at Kings Langley. There is no infrastructure to support this potential growth, loss of wildlife, lack of good public transport, traffic congestion and pollution, low bridges e.g. Toms Lane. There is no capacity for any more cars in this area, cars park on the pavements obstructing pedestrians</li> </ul>



## Appendix 6 – Summary of Strategic Sites / Main Issues Raised – General Public

<b>Site EOS4.0 Land adjacent to Bedmond Road &amp; South of M25</b>	
<b>For</b>	<ul style="list-style-type: none"> <li>• Support sensible site for development with suitable access.</li> </ul>
<b>Against</b>	<ul style="list-style-type: none"> <li>• Objections to the Loss of wildlife and habitats, loss of land in agricultural use, rights of way, fragmentation of the ecology network.</li> <li>• Herts Wildlife Monitors – we do not have an issue with the site per se but there we do have serious concerns regarding protected species on the perimeter/boundary of the site which would result in an objection in part to this site as things currently stand.</li> <li>• Herts &amp; Middx Badger Group – issue regarding protected species on perimeter/boundary, we would be objecting in part to this site.</li> <li>• Objections to loss of Green Belt, development spoiling the rural appearance of the area and coalescence of Kings Langley, Abbots Langley and Watford. The current boundaries of housing in Abbots Road and Gallows Hill mark a clear line between the urban area and the rural Green Belt and should be maintained.</li> <li>• Objections to noise and pollution generated from the M25, lack of public transport, size of development and lack of infrastructure to support development, proximity to M25 would be at risk of exceeded air quality objectives, e.g. the Air Quality Management Area (AQMA) in Chorleywood which has historically exceeded levels of NO2 and PM10.</li> <li>• Questions why Impact of Brexit and the pandemic has not been undertaken.</li> <li>• Objections to the lack of road transport links.</li> <li>• Questions justification for inclusion when other far less rural and key sites elsewhere in the district are available, especially as this site represents a high-quality rural Green Belt buffer between north Watford and St Albans.</li> </ul>
<b>Site OSPF22 Batchworth Golf Course</b>	
<b>For</b>	<ul style="list-style-type: none"> <li>• Supports site for much needed housing and is close to all the necessary amenities.</li> <li>• Supports this development on the basis that there are enough golf courses in the area!</li> <li>• Supports site if developed sensitively</li> </ul>
<b>Against</b>	<ul style="list-style-type: none"> <li>• Objects to the encroachment of Green Belt land. The potential development of Batchworth Golf Club is a particularly good example of the urbanisation of the Green Belt. The proposed development on a large swathe of Green Belt will join Rickmansworth to Northwood, thus extending Greater London into Hertfordshire. The whole purpose of the Green Belt, to protect the expansion of urban areas will be undermined. Refers to Government policy on levelling up and need to build on brownfield sites</li> <li>• Batchworth Golf Course is not an appropriate site for a massive expansion of Rickmansworth/Batchworth into the Green Belt.</li> <li>• Objections to the site as assessed, through the Green Belt Reviews, have been identified as making a significant contribution to the Green Belt and identified as resulting in ‘very high’ harm through its release.</li> <li>• Objections to negative impact on biodiversity, wildlife loss and protected trees.</li> <li>• Objections to the consultation documents as misleading and the Batchworth Park Site (OSPF22) is labelled as the ‘Nine of Herts Golf Course’.</li> </ul>

## Appendix 6 – Summary of Strategic Sites / Main Issues Raised – General Public

	<ul style="list-style-type: none"> <li>Herts Wildlife Monitors – We have concerns with this site due to the development area and the main access road south of the site; this is due to protected species; we would therefore be objecting to this site as it currently stands and would suggest that this part of the development be removed and the main site road be moved further north.</li> <li>Herts &amp; Middx Badger Group – no issue with northern part of site but issue with main site access and Lower part of development site due to protected species; we would be objecting in part to this site.</li> <li><b>02144-02386_Keep Watford Rural petition</b> – object to loss of community facilities/amenity for existing residents, to availability of alternative brownfield sites for this type of development, environmental impact (e.g. on wildlife, biodiversity, noise, pollution, flooding, water supply/sewage, traffic), and does not meet National Policy criteria for loss of Green Belt.</li> <li>Objects due to increased level of traffic and associated air and noise pollution and parking.</li> <li>Objections to lack of secondary schools. In the past the area has witnessed the closing of Durrants and William Penn Secondary Schools which has necessitated the building of a local school on Green Belt land to accommodate a misjudged need or local places.</li> <li>Development not practical in Rickmansworth and should be spread across District.</li> <li>Concern about loss of visual amenity for golfers and those using public rights of way</li> <li>States that the Batchworth Park Golf Club have a long lease on the property to 2096 and are opposed the development – development can't go ahead unless members agree.</li> <li>Quotes recommendations from the Playing Pitch Strategy and Action Plan, Report to the Local Plan Sub Committee in July 2019. Objections to the loss of this leisure facility that is very much needed to ensure there are appropriate facilities to maintain mental health and physical activity.</li> </ul>
<p><b>Site CFS59 Land on London Road, Rickmansworth</b></p>	
<b>For</b>	<ul style="list-style-type: none"> <li>Supports redevelopment of this site for much needed housing and is close to all the necessary amenities, good use of land.</li> </ul>
<b>Against</b>	<ul style="list-style-type: none"> <li>Objections to encroaching on Green Belt, does not meet national policy on Green Belt.</li> <li>Objects to lack of infrastructure to support new development e.g., access.</li> <li>Concern about increase in traffic and pollution</li> <li>Objects and considers Bridge Motors would be far more suitable given access to town and facilities</li> </ul>
<p><b>Site EOS7.0 Land to the south of Shepherds Lane and west of the M25</b></p>	
<b>For</b>	<ul style="list-style-type: none"> <li>Support site redevelopment, minimal impact on the Green Belt and being surrounded on 2 sides by fairly dense development, with the M25 on the 3<sup>rd</sup> side.</li> <li>Supports good access and low impact on existing residents.</li> </ul>
<b>Against</b>	<ul style="list-style-type: none"> <li>Objections to encroaching on the Green Belt/ agricultural land. This potential development comes on the back of previous encroachment on the Green Belt in this area and sits alongside other development plans for Green Belt land adjoining the M25 (East and West) between Shepherds Lane and Long Lane. As such, there is a concern that the 'domino effect' will come into play here.</li> </ul>

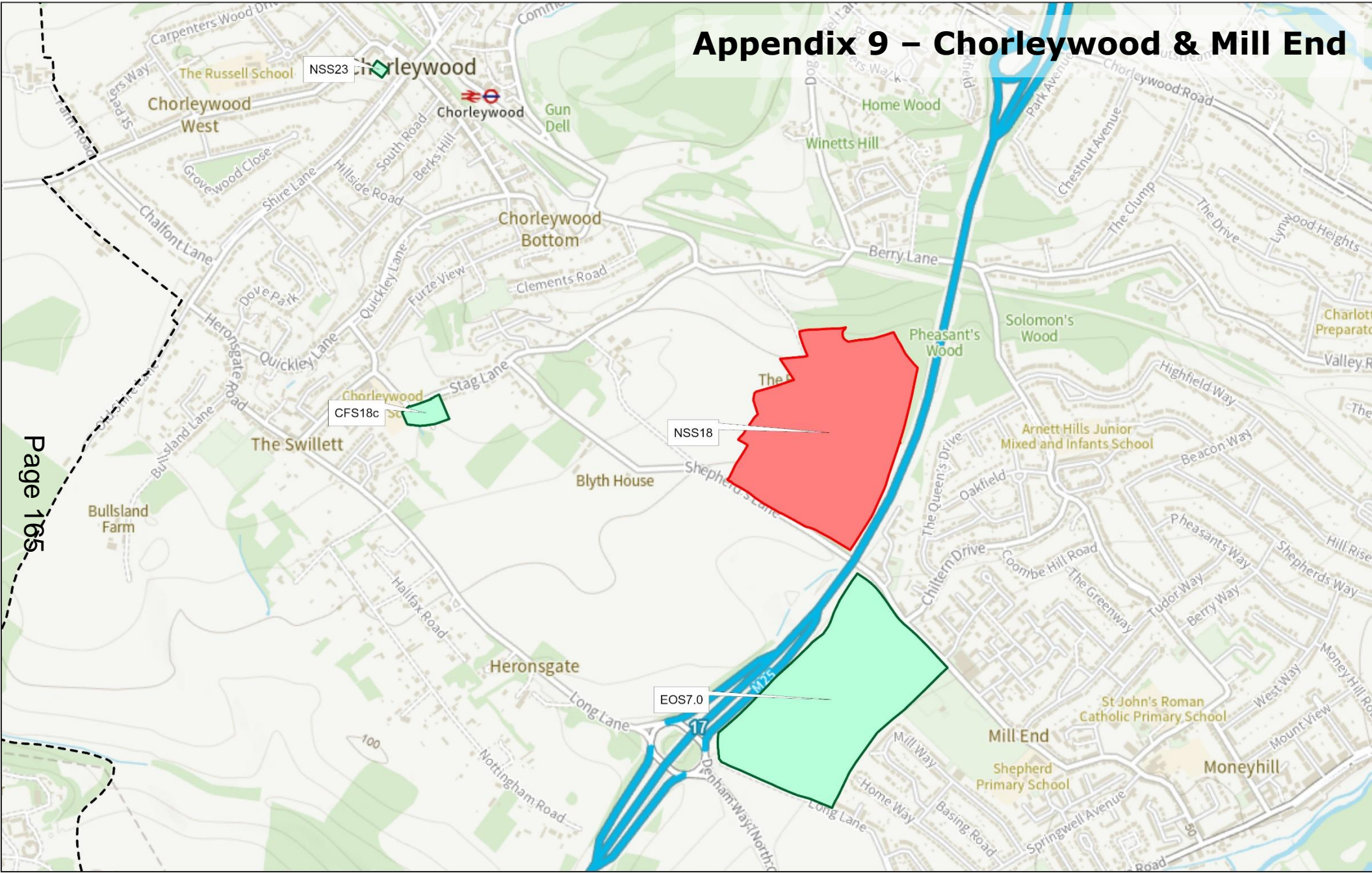
## Appendix 6 – Summary of Strategic Sites / Main Issues Raised – General Public

	<ul style="list-style-type: none"> <li>• Objections to overdevelopment, the cumulative impact of developments in this area would, radically alter the nature of the area while placing intolerable pressure on local amenities.</li> <li>• <b>02144-02386_Keep Watford Rural petition-</b> object to loss of community facilities/amenity for existing residents, to availability of alternative brownfield sites for this type of development, environmental impact (e.g. on wildlife, biodiversity, noise, pollution, flooding, water supply/sewage, traffic), and does not meet National Policy criteria for loss of Green Belt.</li> <li>• Objections to the loss of wildlife and biodiversity, loss of open space and countryside (Colne Valley Regional Park).</li> <li>• Objections to sites proximity to the school and effect on children’s health.</li> <li>• Objections to the impact of increased traffic in residential areas in Mill End, where roads are very narrow. Increased risk of air pollution levels being exceeded e.g., the Air Quality Management Area (AQMA) in Chorleywood, has historically exceeded levels of NO2 and PM10.</li> <li>• Objections to insufficient infrastructure to support this development in terms of access roads and public services.</li> <li>• Objections to significant flood risk to the properties backing onto the site in Mill Way, Whitfield Way, Home Way and Long Lane.</li> <li>• Objections to new school. There is also absolutely no requirement for a further primary school in the area.</li> <li>• Herts Wildlife Monitors / Herts &amp; Middx Badger Group – Objections to protected species on this site.</li> </ul>
<p><b>Site CFS18b Hill Farm, Stag Lane</b></p>	
<p><b>For</b></p>	<ul style="list-style-type: none"> <li>• Support only the farmyard area as being appropriate for development.</li> <li>• Support housing allocation esp. first homes.</li> <li>• Supports site for a mixture of flats and houses, as it is near all the required amenities.</li> <li>• Herts Wildlife Monitors – no issues</li> </ul>
<p><b>Against</b></p>	<ul style="list-style-type: none"> <li>• Objects to loss of Green Belt as does not meet national policy for loss of Green Belt. Quotes paragraph 137 of NPPF (reasonable options to be considered before exceptional circumstances exist to justify changes to the Green Belt) that Green Belt release should be considered as a last resort.</li> <li>• Brownfield sites should be used instead.</li> <li>• Objections to the failure to consider the effect on the Heronsgate Conservation Area.</li> <li>• Herts &amp; Middx Badger Group – Objections to protected species on part of site, we would be objecting in part to this site</li> <li>• Objections to lack of other Infrastructure. e.g., schools to meet additional demands of the future population.</li> <li>• Concerns about road safety, capacity, and resident’s parking- the cumulative impact of sites CW9, CW24, and CW25.</li> <li>• Chorleywood Neighbourhood Plan contains provisions to prevent any adverse impact to views in and out of Conservation Areas and limits on the number of storeys that development can include. It is also a requirement that developments of this size be able to demonstrate that safe routes for pedestrians and cyclists in order for planning permission to be granted.</li> <li>• Questions density of proposed allocation.</li> </ul>

## Appendix 6 – Summary of Strategic Sites / Main Issues Raised – General Public

<b>Site EOS12.2 Land to the west and south of Maple Cross</b>	
<b>For</b>	<ul style="list-style-type: none"> <li>• Support despite Green Belt the area is essentially already contaminated by the huge HS2 works. The site has good access onto an existing main road with good visibility. The plan makes provision for increasing local services required by a development of this size.</li> <li>• Supports the need for housing.</li> </ul>
<b>Against</b>	<ul style="list-style-type: none"> <li>• Objects to loss of Green Belt as does not meet national policy.</li> <li>• Objects to no assessment being made of the Green Belt function of this site.</li> <li>• Residents use the area for open space (especially since Covid)</li> <li>• <b>Bucks Councillors – EOS.12.2 West and South Maple Cross and EOS.12.3 North Chalfont Lane.</b> Your plan shows large scale housing on these two sites amounting to 1676 dwellings and a 90-bed care home. Both of these sites are in the Green Belt and we do not believe that special circumstances exist to build on these sites. They satisfy purposes outlined in the NPPF and act as a buffer to retain the separation of Chalfont St Peter and indeed Buckinghamshire from its boundary with Three Rivers and Hertfordshire.</li> <li>• Objections to the Local Plans disproportionate bias towards building houses in Maple Cross. The 1500+ houses proposed for this site would mean the population of Maple Cross is likely to increase by over 100%.</li> <li>• Objects to lack of infrastructure, water/ sewerage, local infrastructure cannot cope with this increase in dwellings, the increase in traffic will add to the already high pollution in Maple Cross.</li> <li>• Concerned about the impact on wildlife/ biodiversity</li> <li>• Chilterns Conservation Board. EOS12.2 and 12.3 – Maple Cross. Both these sites are significant greenfield sites that have the potential to be highly visible from the AONB at Newland Park outside of the district boundaries. A visual impact assessment should be sought as part of the justification for including these sites in the plan</li> <li>• Herts Wildlife Monitors – EOS12.2 – we have no concerns regarding the large part of the site which lies to the west of Maple Cross (which runs alongside the M25) but we do have concerns regarding the site south of Maple Cross (this includes the area shown as an indent within the LP) due to protected species so we would be objecting to this part of the development/site.</li> <li>• Herts &amp; Middx Badger Group – EOS12.2 no issues regarding the large part of the site west of Maple Cross (running alongside the motorway) but issues regarding the site south of Maple Cross (including the indented section) due to protected species so we would be objecting to this part of the development/site.</li> </ul>

# Appendix 9 – Chorleywood & Mill End

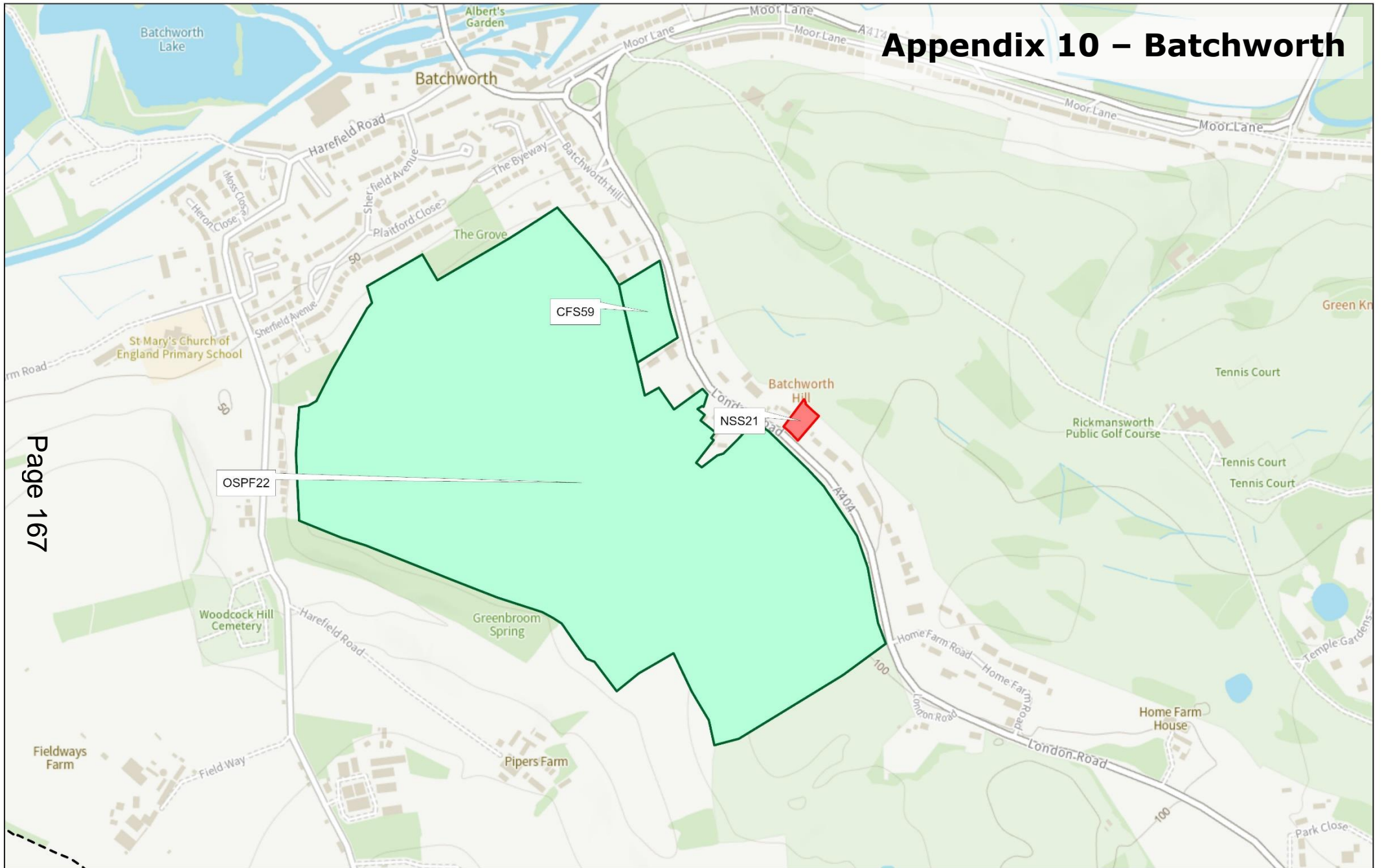


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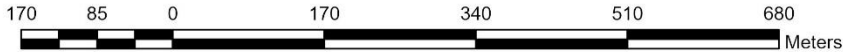
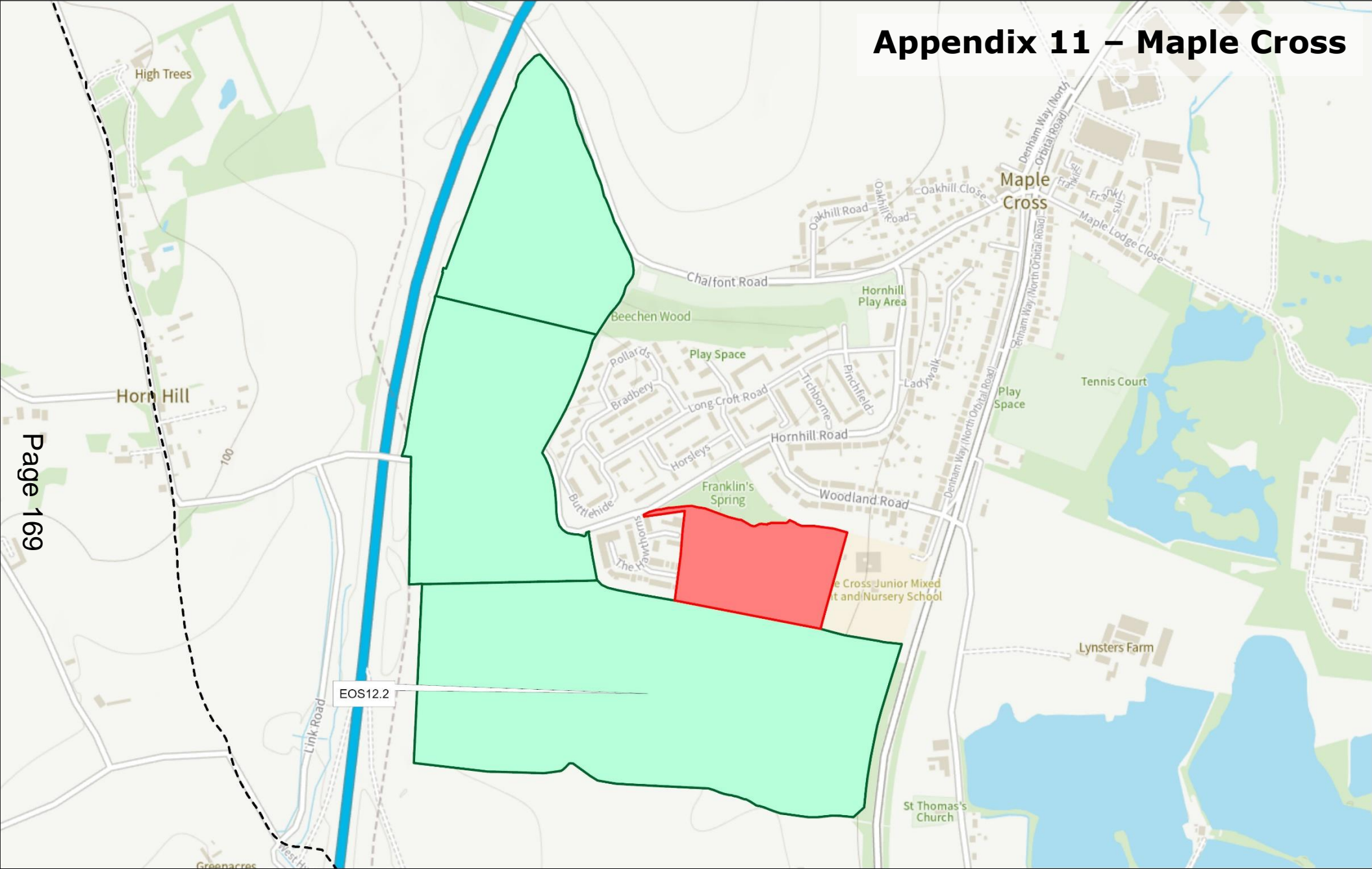
# Appendix 10 – Batchworth



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# Appendix 11 – Maple Cross



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