THREE RIVERS DISTRICT COUNCIL

Three Rivers House
Northway
Rickmansworth
Herts WD3 1RL

LOCAL PLAN SUB-COMMITTEE

VIRTUAL MEETING

NOTICE AND AGENDA

For a virtual/remote meeting to be held on Tuesday, 16 July 2024 at 7.00 pm

Members of the Local Plan Sub-Committee:-

Councillors:

Stephen Giles-Medhurst (Chair)
Christopher Alley
Oliver Cooper
Stephen Cox
Steve Drury
Louise Price (Vice-Chair)
Philip Hearn
Chris Mitchell
Sarah Nelmes
Andrew Scarth

Joanne Wagstaffe, Chief Executive
Monday, 8 July 2024

"The Local Authorities and Police and Crime Panels Coronavirus) (Flexibility of Local Authority and Police and Crime Panel Meetings) (England and Wales) Regulations 2020 made under the Coronavirus Act 2020 enable Council / Committee meetings to be held in a virtual format and enables remote attendance.

The meeting will start at 7.30pm and will be virtual / remote, in that they will be conducted at no specific location and all participants are at various locations, communicating via audio and online.

The Council welcomes contributions from Members of the public to its discussion on agenda items at Planning Committee meetings. Contributions will be limited to one person speaking for and one against each item for not more than three minutes. Please note that in the event of registering your interest to speak on an agenda item but not taking up that right because the item is deferred, you will automatically be given the right to speak on the item at that next meeting of the Committee. Details of the procedure are provided below:

Members of the public wishing to speak will be entitled to register and identify which application(s) they wish to speak on from the published agenda for the remote meeting. Those who wish to register to speak must do so by notifying the Committee team by e-mail (CommitteeTeam@threerivers.gov.uk) 48 hours before the meeting. The first 2 people to register on any application (1 for and 1 against) will be sent a link so that they can join the meeting to exercise that right. This will also allow the Committee Team to prepare the speaker sheet in advance of the remote meeting to forward to the Chair of the meeting.

In accordance with The Openness of Local Government Bodies Regulations 2014 any matters considered under Part 1 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 Act and the laws of libel and defamation.

Please note that the meeting is being held virtually. The business of the meeting will be live streamed.

1. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

2. MINUTES (Pages 3 - 8)

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 Chairman to rule on the admission of such items.

4. DECLARATION OF INTERESTS

To receive any declaration of interests.

5. LOCAL PLAN REGULATION 18 PART FOUR CONSULTATION SUMMARY, NON-HOUSING SITES & BEDMOND VILLAGE GROWTH OPTIONS (Pages 9 - 214)

This report provides a summary of the Regulation 18 consultation on the Council's low housing growth option, seeks Member agreement of the growth option to be pursued for the Regulation 19 Publication of the Local Plan, seeks Member approval of a range of potential non-housing allocations and agreement of approach to Bedmond village.

6. OTHER BUSINESS - If approved under item 3 above.

General Enquiries: Please contact the Committee Team at
committeeteam@threerivers.gov.uk

THREE RIVERS DISTRICT COUNCIL

At a meeting of the Local Plan Sub-Committee held in the Penn Chamber, Three Rivers House, Rickmansworth, on Thursday, 24 August 2023 from 7.00 - 9.45 pm

Present: Councillors Councillor Stephen Giles-Medhurst, Councillor Matthew Bedford,

Sara Bedford (In place of Phil Williams), Oliver Cooper, Stephen Cox, Steve Drury, Rue Grewal, Philip Hearn, Chris Lloyd and Narinder Sian (In place of Chris Mitchell)

Also in Attendance:

Raj Khiroya, Abbas Merali, Louise Price and Ciaran Reed

Officers in Attendance:

Marko Kalik, Head of Planning Policy & Conservation
Judy Smith, Planning Officer
Sarah Haythorpe, Principal Committee Manager

External in Attendance:

LPSC18/23 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillors Phil Williams and Chris Mitchell who were substituted by Councillors Sara Bedford and Narinder Sian, respectively.

LPSC19/23 MINUTES

The minutes of the Local Plan Sub-Committee meeting held on 3 August 2023 were deferred to the next meeting of the Sub-Committee.

LPSC20/23 NOTICE OF OTHER BUSINESS

There were no items of Other Business.

LPSC21/23 DECLARATION OF INTERESTS

There were no Declarations of Interest.

LPSC22/23 LOCAL PLAN – MODERATE-HIGH HARM AND HIGH HARM STRATEGIC GREEN BELT SITES AND NEWLY SUBMITTED SITES

The Sub-Committee had before them, a report setting out the Regulation 18 strategic sites of circa 500 dwellings or more that fell 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 outweighed the harm to the Green Belt of removing the site for development. The approach followed the approach agreed at the 13 June 2023 Local Plan Sub-Committee meeting.

The report also considered a strategic site that fell into low to moderate harm; one smaller low-to-moderate Green Belt harm site that required some additional work by officers; as well as a C2 care home site that fell into moderate-high Green Belt harm. At the same meeting of the Local Plan Sub--Committee on 13 June 2023, it was agreed that no sites that fell within areas of extremely high Green Belt harm would be considered acceptable, even if they were strategic in nature.

Several new sites were submitted because of the Regulation 18 Additional Sites for Potential Allocation consultation which had taken place earlier in the year, and two sites that had been submitted through the brownfield call for sites exercise.

The sites had been assessed and were discussed in the report.

It was recommended that the Local Plan Sub-Committee –

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

Before considering the report, the Chair, seconded by Councillor Bedford, moved an amendment to the recommendations set out in the report, as follows –

<u>Amended Recommendations</u>

It was recommended that the Local Plan Sub-Committee –

1. Note the contents of the report.
2. Note the contents of the presentation.
3. Consider the sites as set out in the presentation against the criteria set out in this report and slides.

Having outlined the reasons for the amended recommendations the Chair stated that two requests had been received to address the Sub-Committee and that he had agreed to the requests.

<u>Representations</u>

The Sub-Committee heard representations –

1. By a local resident regarding land between Adams House and Five Oaks, London Road, which had not been recommended for consultation (Appendix 2 of the Report: Sites Not Recommended SHELAAS, Page 11); and
2. Mr John Bishop of the Three Rivers Joint Residents Association who spoke in support of the amended recommendations.

Having heard the representations, the Chair invited Marko Kalik, Head of Planning Policy & Conservation, to present the report. During his presentation, Members of

the Sub-Committee raised various issues and concerns and, where appropriate, Mr Kalik responded accordingly. The issues and concerns raised by Members, and Mr Kalik's responses were, as follows.

a) Any comments by Hertfordshire County Council regarding the amended site plan for NSS6 North Cott, East Lane and Bedmond, would form part of the next round of consultation.

b) A sustainability appraisal assessing the extent to which the Local Plan ("the Plan") contributed to sustainable development had been prepared and sustainability appraisals, which had yet to be carried out for new sites included in the Plan, would be submitted to the Policy and Resources Committee.

c) There was a proposal for elderly accommodation between Adams House and Five Oaks. However, the lack of sustainable transport links made this site unsuitable for development. The promoter had compared the site to another site adjacent to the Batchworth Golf Course site which was for a Care Home. It was understood by officers that Care Homes often provided their own shuttle service for residents. Therefore, the transport links between the two sites were not comparable.

d) Despite the proposal, in accordance with the Local Housing Needs Assessment, that a care home be provided on the site adjacent to the Batchworth Golf Course site, the lack of suitable transport links did not make this an appropriate site for a care home.

   As it was proposed that this would be a C2 care home, there was not the same requirement for public transport links.

   [There followed a discussion on the suitability of this site as a location for a care home; the requirements of residents in a C2 care home for public transport links; a proposal that detailed consideration of the suitability of the site was a matter for a planning application; an observation that other care homes in less sustainable locations provided transport for the residents; and that this was not a planning application as noted by Hertfordshire County Council in its observations about the site].

e) Regarding the proposal for 1,500 dwellings on the Maple Cross site, it would be necessary to ask the site promoter regarding the proposed allocation of houses between the low-moderate (green) site and the moderate (yellow) site, as indicated in the Plan in the report.

   It was noted that, of the 850 dwellings that could be provided on the low-to-moderate harm (yellow and green on the Plan), could be further reduced to deliver the necessary on-site infrastructure provision.

   Hornhill Road, which would be the main access, was a busy road with a lot of parked cars and a narrow lane leading away from Maple Cross, making this an unsuitable site for 850 homes.

   Without more information, including information regarding the benefits of developing on the site, the proposal to develop the site would not meet the legally required standard of exceptional circumstances.

   [Officers subsequently advised that exceptional circumstances were a policy, rather than a legal, requirement, and the (possibly unrealistic) benefits of delivering the site were agreed at the meeting].

   The Council presently had 136 homeless applications, 65 households in temporary accommodation, and hundreds of persons on the housing waiting

list. Therefore, as the Sub-Committee was considering which sites should be included in the Local Plan consultation, the only way developers could be persuaded to build affordable housing would be to include this within larger development schemes.

Representations by Local Ward Councillors

The Sub-Committee heard representations by Councillors Louise Price and Raj Khiroya, Chorleywood South and Maple Cross.

Representation by the County Councillor

The Sub-Committee heard a representation by Councillor Paula Hiscocks, Rickmansworth West.

The Chair then invited Members of the Sub-Committee to respond to the representations. Having heard the responses to the representations, Mr Kalik, at the invitation of the Chair, provided clarification on the requirements of the National Planning Policy Framework (NPPF) in the present process.

f) The reduction in the number of proposed dwellings for the Shepherds Lane site was welcomed as was the infrastructure provision would provide residents with desperately needed services as well as affordable homes. In addition, there would be a biodiversity benefit because of the development.

If exceptional circumstances were to apply, the Council should be seeking significantly more than 45% affordable housing to be provided and should put the onus on the developer to establish the exceptional circumstances.

Denham Parish Council, as a statutory consultee, had opposed the development on the basis that it was unreasonable to put so many large developments in one area. Further, the proposed development did not provide the necessary infrastructure or employment opportunities for this area.

The Local Government Association's (LGA's) Planning Advisory Service (PAS) had advised that Three Rivers District Council had the highest percentage of affordable housing, including affordable housing that was rented. Therefore, a provision for 45% affordable housing was more likely to be achieved than if the Council waited for a planning application and the 45% figure was challenged by the developer on the grounds of viability.

The exit onto shepherds Lane was a small, busy road and the additional traffic that would be generated by the development would add significant extra traffic.

[The Chair noted that there had been no objection to the proposal by the Highways Authority on the grounds of accessibility and that it would be for the developer to address issues of accessibility at the Planning stage].

Representation by the County Councillor

The Sub-Committee heard a representation by Councillor Paula Hiscocks, Rickmansworth West, expressing concerns about the proposals.

g) Regarding the Hill Farm Stag Lane proposals, the Chair stated that, although he was not a Ward Councillor, he was willing to hear a representation by Councillor Cieran Reed, Chorleywood North and Sarratt.

Representation By Councillor Cieran Reed, Chorleywood North and Sarratt.

The Sub-Committee heard a representation by Councillor Cieran Reed expressing concerns about access to the site.

h) Given the poor state of the Chorleywood Telephone Exchange, Shire Lane, site, it was proposed that this was an appropriate site for development and that, if possible, consideration should also be given to ways in which the surrounding area, which was also in a poor state, could be improved.

Having concluded his presentation, Mr Kalik summarised the standard method target and the officer recommended target of 450 dwellings per annum. He noted that there was a risk associated with the lower housing approach and it might be that the Planning Inspector would request the Council to find additional sites or instruct the Council to include specific sites. It was also possible that the Planning Inspector might find that the Plan did not meet the NPPF in terms of housing need and, therefore, reject the Plan.

In addition, the NPPF required neighbouring authorities to meet any unmet need by Three Rivers District Council. Therefore, there was a possibility that those authorities could object to the Plan on the grounds that the Council had not met its "duty to cooperate" requirements.

The Chair then opened the debate on the motion to amend the recommendations set out in the report.

Council Cooper spoke at length opposing the amended recommendation, as set out in the motion by the Chair and seconded by Councillor Bedford.

Councillor Cooper, seconded by Councillor Hearn, proposed the following amendment to the motion:

<u>Amendment</u>

That all parts of the following developments be removed from the consultation –

1. Maple Cross;
2. Shepherds Lane

Having debated the amendment, the Chair then put the amendment to a vote, the results of which were, as follows.

For the Amendment:	4
Against:	7
Abstentions:	0

The Chair announced that the amendment was lost.

<u>Original Motion</u>

The Chair put his original motion, seconded by Councillor Bedford, to a vote, the results of which were, as follows.

For the Motion:	7
Against:	4
Abstentions:	0

The Chair announced that the motion was carried.

As there was no Other Business, the Chair thanked everyone for their attendance and closed the meeting.

CHAIRMAN

Three Rivers District Council

Local Plan Sub-Committee Report

16 July 2024

THREE RIVERS DISTRICT COUNCIL

PART I

LOCAL PLAN – 'LOW HOUSING GROWTH' CONSULTATION SUMMARY, HOUSING GROWTH OPTIONS, POTENTIAL NON-HOUSING ALLOCATIONS AND POTENTIAL BEDMOND ALLOCATIONS
(DoF)

1 Summary

1.1 This report provides a summary of the Regulation 18 consultation on the Council's low housing growth option, seeks Member agreement of the growth option to be pursued for the Regulation 19 Publication of the Local Plan, seeks Member approval of a range of potential non-housing allocations and agreement of approach to Bedmond village.

2 Introduction

2.1 From 27 October to 10 December 2023 the Council consulted on a low housing growth option. This concluded its Regulation 18 stage consultations. We are now working towards the Regulation 19 'Publication' stage of Local Plan preparation.

2.2 The approach to the low housing growth option includes sites that were agreed for consultation in the 2021 Sites for Potential Allocation and 2023 Additional Sites for Potential Allocation 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.

2.3 A summary of the low housing growth consultation is included in Appendix 1 to this report, with a more detailed summary of statutory consultee comments at Appendix 2.

2.4 In 2021 we consulted on our Preferred Policy Options and Potential Site Allocations in the form of a full draft Local Plan. This round of Regulation 18 consultation aimed to meet the Government's standard method target, however did not quite meet the target in full. Officers consider this consultation to have been on our high growth option.

2.5 A potential moderate growth option was considered at the 24 August 2023 Local Plan Sub-Committee meeting. This option included strategic sites, of circa 500 dwellings or more, that fall within areas of 'moderate-high' and 'high' Green Belt harm where the benefits of these sites in terms of sustainability, access to services and infrastructure provision potentially outweigh the harm to the Green Belt.

2.6 As we work towards our Regulation 19 consultation, Officers seek Member agreement on the growth option to take forwards in the final draft version of the plan. Officers will then work to finalising the final pieces of evidence work based on the agreed growth option.

2.7 The last two rounds of Regulation 18 consultations, both conducted in 2023, focused purely on housing growth. The potential site allocations consulted on in the Part 2 Regulation 18 consultation in 2021 also contained potential allocations

for uses other than housing. Officers are seeking approval from Members for these sites.

3 Background

3.1 The first piece of evidence work completed relating to housing need for the new Local Plan was the South West Hertfordshire Strategic Housing Market Assessment (SHMA, 2016). This set out the Objectively Assessed Need (OAN) for the area. This predated the Government's standard method for calculating housing need and was a locally devised methodology following the guidance at the time.

3.2 The SHMA concluded that the OAN for housing in Three Rivers for the period of 2013-2036 was 514 dwellings per annum. This was a significant increase to the Council's existing target of 180 dwellings per annum set out in the Core Strategy (2011).

3.3 Recognising that the OAN is the starting point when seeking to establish an appropriate housing requirement for the area, officers contemplated wider policy objectives where relevant. Such considerations included the delivery of affordable housing, the potential to enable growth of the local economy and strategic constraints such as Green Belt.

3.4 This work fed into our first round of Regulation 18 consultation known as Issues & Options (2017). In terms of housing need the consultation considered three growth options. These were 'Low Growth' of 411 dwellings per annum (20% below OAN), 'Moderate Growth' of 514 dwellings per annum (OAN) and 'High Growth' of 617 dwellings per annum (20% above OAN). 18% of respondents supported the low growth option, 41% supported moderate growth and 41% supported high growth. It should be noted that there was a low response rate to this consultation, which is common at this stage in plan-making.

3.5 In 2018 the Government introduced the standard method for calculating housing need, taking away the power for local authorities to calculate their own housing need. The standard method identifies a minimum annual housing need figure. This produced a minimum annual housing need figure of 615 dwellings per annum for Three Rivers. In other words, we were being forced into the 'High Growth' option.

3.6 The Local Housing Needs Assessment (2020), an updated version of the 2016 SHMA, applied the standard method in the study with the minimum housing need figure now at 630 dwellings per annum. The study concluded that there were no exceptional circumstances that justified using an alternative method for calculating housing need.

3.7 The Council also produced a number of other evidence base studies that explored other development needs for the area beyond housing. These included the Economic Study (2019) which considered the District's employment needs; the Retail & Leisure Study (2018) which assessed retail and leisure needs across the District; the Gypsy & Traveller Accommodation Assessment (2017) which analysed current and future need for Gypsy, Traveller and Travelling Show People; and the Open Space, Sport and Recreation Study (2019) which assessed open space provision in the area, its condition, distribution and overall quality. These studies formed the basis for potential allocations and setting policies relating to development other than housing.

<u>Regulation 18: Preferred Policy Options and Sites for Potential Allocation (2021)</u>

3.8 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.

3.9 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.

3.10 This total was considered the closest the Council could come to meeting the standard method target at the time. All the remaining housing sites were considered to be either unsuitable or unavailable for development.

3.11 This consultation also sought views on potential sites in uses other than housing. These included sites for gypsies and travellers and travelling showpeople, employment, Warner Bros. Studios, town centres and retail, open space, education, Langleybury and the Grove, and Maple Lodge Wastewater Treatment Works.

Regulation 18: Additional Sites for Potential Allocation (2023)

3.12 As a result of the Regulation 18 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.

3.13 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 to further Regulation 18 consultation considering different levels of growth.

Regulation 18: Lower Housing Growth Option (2023)

3.14 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.

3.15 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 this year.

3.16 An updated NPPF was published in December 2023 clearly setting out that the standard method is not mandatory and only an advisory starting point. Adding that in exceptional circumstances it may be appropriate to use an alternative method to the standard method. It should however be noted that the NPPF still states, in the context of delivering homes, the aim of local authorities should be to "meet as much of an area's identified housing need as possible".

3.17 This potentially provides greater flexibility to plan for fewer (or more!) homes than the standard method indicates. Notwithstanding these changes, the requirement to provide a robust justification for why deviation from the standard method figure is deemed essential still exists. This is likely to be closely scrutinised at examination.

3.18 The ability for local authorities to use an alternative approach to the standard method where there are exceptional circumstances that can be justified has been retained. The examples provided of exceptional circumstances are 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.

3.19 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 focused on lower housing numbers than had been consulted on in the previous round of Regulation 18 consultation.

3.20 Officers were tasked with considering the best approach to calculating an appropriate lower housing target. As noted above, officers do not feel that pursuing an alternative method to the standard method would be an appropriate course of action as it could lead to the plan being found unsound at examination.

3.21 Having ruled out an alternative calculation to the standard method Officers considered a constraints based approach to housing growth. Using the Stage 2 Green Belt Review evidence base document.

<u>Green Belt as a constraint</u>

3.22 All the policy, physical, and environmental constraints relating to potential sites have been considered through the Strategic Housing and Employment Land Availability Assessment (SHELAA). Although Green Belt has been referred to in the SHELAA site assessments, the decisions on approach to the Green Belt are for the Council to make as part of the plan making process and go beyond the remit of the technical SHELAA site assessments.

3.23 For the Part 2 Regulation 18 consultation in 2021 A particular approach to Green Belt release was adopted in order to try and meet the standard method housing target.

3.24 Prior to the publication of the updated NPPF in December 2023 it was expected that LPAs would review their Green Belt in order to meet the standard method target. This was despite no such requirement being explicitly set out in the NPPF. No Local Plans were successful at examination arguing a lower housing target based purely on Green Belt constraints.

3.25 The updated NPPF (2023) clearly states that:

"O*nce established, there is no requirement for Green Belt boundaries to be reviewed or changed when plans are being prepared or updated. Authorities may choose to review and alter Green Belt boundaries where exceptional circumstances are fully evidenced and justified, in which case proposals for changes should be made only through the plan making process*." (paragraph 145)

3.26 We haven't yet seen this tested at examination and it should be noted that the overall thrust of the NPPF is meeting development needs for an area. The

framework needs to be considered as a whole so we will be scrutinised as to whether we are doing all we can to meet need. That said, Officers believe that the above NPPF paragraph and footnote 7 in the framework, which states that Green belt is a policy that may provide reason for restricting the overall scale of development in the plan area (paragraph 11), provide the opportunity to consider a potentially lower level of growth based on District's Green Belt constraint.

3.27 The Council has undertaken Green Belt Reviews as part of its evidence work for the Local Plan. As previously reported to the Local Plan Sub-Committee the Green Belt Review does not in itself draw conclusions as to where land should be released to accommodate development, but identifies the relative variations in the harm to the Green Belt and that planning judgement is required to establish whether the sustainability benefits of Green Belt release and the associated development outweigh the harm to the Green Belt.

3.28 The level of harm that Officers used in recommending sites within the 2021 Regulation 18 Part 2 Sites for Potential Allocation document is summarised below:

Harm Rating*	7 point scale ranging from very high to very low harm
Very High	Not considered acceptable for residential development
High	Development may be considered acceptable for strategic sites, in very sustainable locations, that deliver infrastructure and considerable community benefits
Moderate-High	Development may be considered acceptable for strategic sites in sustainable locations that deliver infrastructure and community benefits.
Moderate	All sites considered
Low-Moderate	All sites considered
Low	All sites considered

3.29 The previous approach was based on the assumption that the Council could demonstrate the exceptional circumstances for Green Belt release on the basis of overall housing need. This is no longer the case, however there may be other factors that could be considered to constitute exceptional circumstances such as the acute and pressing need for affordable homes in the District and housing for the elderly.

3.30 The LHNA sets out the need for affordable housing for rent on its own is 364 dwellings per annum which is 57% of the current standard method target. On top of that the Government requires a minimum of 25% of affordable housing to be delivered as First Homes. The Draft Affordable Housing Policy reported to the Local Plan Sub Committee in March 2022 sets a target of 40% of housing delivered to be affordable. Without going into the Green Belt we wouldn't be able to deliver even a 10th of the LHNA target.

3.31 The Council has prioritised development in the urban area and on brownfield land, whereas sites in the Green Belt have been the last option. Looking at delivering housing only on non-Green Belt sites we wouldn't be able to deliver much over 1,000 dwellings in total, plus around 880 dwellings expected to come forward as windfall. This small scale of growth is considered by officers to be detrimental to the District. It would result in practically no infrastructure being delivered as this is funded from development through CIL and Section 106. It will reduce the competitiveness of the labour market. Finally, it would significantly exacerbate the declining levels of affordability in the District. Officers have therefore concluded that there are exceptional circumstances for Green Belt release.

3.32 Officers therefore recommended that some Green Belt release is required but this should be focused on the areas that would result in the least harm to the Green Belt. To protect the most valuable areas of Green Belt we used the Stage 2 Green Belt Review as the basis for deciding which sites should remain as potential sites for allocation. The proposed threshold included any suitable sites that fell into parcels that have a harm level of 'moderate' or lower. Sites that fell into a harm level of 'moderate-high' or above were considered to cause an unacceptably high level of harm to the Green Belt if they were to be removed for development.

3.33 Sites in areas of 'moderate harm' or less together with a windfall allowance and brownfield sites totalled 4,852 dwellings. Which translates to 270 dwellings per annum. This level of growth was considered too low by Officers who felt that the benefits of strategic sites that may fall into areas of higher harm should be considered.

3.34 The key reason for officers considering 270 dwellings per annum being too low was because it will leave the Council too far from meeting its overall housing need, affordable housing need, and specialist accommodation needs. Some of this deficit could be met through the delivery of strategic sites. We need to attempt to meet as much of our affordable housing need as possible whilst minimising the impact on the Green Belt and strategic sites providing at least 40% affordable housing would help in this regard.

Strategic Sites in the Green Belt

3.35 There is no set number of dwellings that constitute a strategic site, however officers consider circa 500 dwellings to be an appropriate threshold as these are the dwelling numbers where we can begin to expect more on site infrastructure provision. Strategic sites are of a scale where they can deliver more benefits than the same number of dwellings being delivered through multiple smaller sites.

3.36 The additional benefits that can be provided by strategic sites may outweigh the harm to the Green Belt of removing that land for development. Details of specific strategic sites were reported to the 24 August 2024 Local Plan Sub-Committee meeting. The decision by Members at this meeting was to not include any sites (other than brownfield sites in the Green Belt) that fell within area of above 'moderate harm'.

3.37 The Council consulted on its Low Housing Growth Option from October to December 2023. The consultation included questions relating to our approach to housing growth and whether we should be attempting to meet the standard method. It also sought comments on the sites providing the 4,852 dwellings across the plan period.

4 Details

Regulation 18 Part 4 Low Housing Growth Consultation Summary

4.1 A detailed summary of the consultation can be viewed in Appendices 1 and 2 to this report. A few of the key points from the summary report will be covered in the forthcoming paragraphs.

4.2 A total of 17,036 responses were received from 957 respondents. Respondents included residents, statutory and non-statutory consultees and other interested groups and organisations.

4.3 In terms of demographics, there was a large generational disparity between respondents. Well over half of all public responses came from those born prior to 1970 and as few as 21 respondents came from those born after 1990. It is clear that further efforts need to be made to encourage young people to comment given that they may have differing viewpoints and priorities. We will continue to endeavour to engage more young people and other hard to reach groups going forwards.

4.4 The summary report sets out the main points raised by statutory consultees and how these relate to the sites in the consultation. In terms of responding to our approach to growth the statutory consultees mainly focused on the effects of this growth and site specific issues and remained neutral to the question of our approach.

4.5 The public responses have been broken down into key themes that recurred across the majority of sites.

4.6 The vast majority of public respondents agree with the Council's proposed stance of not complying with the Government's Standard Method. In total, 789 (91.6%) respondents agreed with this approach whilst 72 (8.4%) did not. Similarly, the vast majority of public respondents agreed that the Council's preferred 'Low Growth and Green Belt Restraint' option is the best growth strategy for the district. 767 (90.3%) of respondents agreed with this approach whilst 82 (9.7%) did not.

4.7 It should be noted that although these figures show strong public support for the Council's approach to housing growth, Regulation 18 Local Plan consultations are not a vote. We are required to prepare a plan in accordance with legislation and national policy. The plan must be justified by a robust evidence base and acceptable in technical planning terms. This will be scrutinised at the examination in public by the Planning Inspector.

4.8 For example, the Inspector will note public support for our approach to growth using Green Belt as a constraint, however he will weigh this up against other requirements in the framework, the level of unmet need as a result of this approach, Duty to Cooperate requirements and the technical statutory consultee responses.

Regulation 19 Housing Growth

4.9 Following the Regulation 18 Low Housing Growth consultation, Officers are working on a new housing trajectory setting out the dwelling numbers and phasing of development in preparation for the Regulation 19 Publication of the Local Plan. We are also working on the final evidence base studies such as the Infrastructure Delivery Plan and Whole Plan Viability Assessment. Prior to

completing this work we need to agree the Growth Option we will be taking forward into Regulation 19.

4.10 The Part 4 Regulation 18 Low Housing Growth document considered three growth options prior to setting out its preferred low growth option. As stated in the background section to this report the Council consulted on growth options as part of its Issues and Options consultation in 2017. This used the Objectively Assessed Need figure (prior to the introduction of the standard method) of 514 dwellings per annum. The Issues and Options consultation considered three growth options. These were 'Low Growth' of 411 dwellings per annum (20% below OAN), 'Moderate Growth' of 514 dwellings per annum (OAN) and 'High Growth' of 617 dwellings per annum (20% above OAN).

4.11 The standard method target of 637 dwellings per annum was considered to be the 'High Growth' option and this more or less aligns with the 'High Growth' option consulted on in the Issues and Options. Officers also considered whether a higher growth option that goes beyond the standard method would be appropriate, however as we were unable to meet the standard method target in full through the Regulation 18 Part Two and Part Three consultations this option was not pursued.

4.12 The approach set out in the Part 4 consultation was considered the 'Low Growth' option and resulted in 270 dwellings per annum across the 18 year plan period. This 'Low Growth' option was reached by using the Green Belt constraint led approach set out in this in the background section to this report where the most valuable areas of Green Belt remain protected but some lower harm areas of Green Belt are proposed to be released in order to help meet the development needs of the area as much as possible.

4.13 At the Local Plan Sub-Committee on the 24 August 2023 Officers recommended 415 dwellings per annum including some strategic sites in higher areas of Green Belt harm, and this was considered the 'Moderate Growth' approach and is midway between the standard method 'High Growth' option and the Council's preferred 'Low Growth' option. Members agreed the preferred low growth option as it will result in protecting the most valuable areas of Green Belt from development. Whereas the Moderate and High Growth options were considered to result in unacceptable harm to the Green Belt.

4.14 Officers are still working on final dwelling numbers and there will be changes to the figures as a few sites may come out following the consultation and a few may potentially come back in subject to Member decisions at future Local Plan Sub-Committee meetings. Some dwelling capacities may be revised as we consider the developable area of sites, as there will need to be an assumption that parts of the sites won't be developed to allow for green infrastructure and biodiversity net gain.

4.15 Although we do not have exact dwelling numbers available at this stage, we can make assumptions of roughly what each growth option will look like. The standard method target would now result in 640 dwellings a year, so we know the high growth option. The moderate growth option equated to 450 dwellings per annum so we can assume the figure would still be similar whereas the low growth option consulted on last year equated to 270 dwellings per annum and again we can assume the figure would still be in this range.

4.16 Officers still believe that the moderate growth option is the best option going forwards. 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.

4.17 Officers consider that the benefits delivered by suitable strategic sites in sustainable locations outweigh the higher levels of harm to the Green Belt. These benefits include onsite infrastructure provision such as schools, healthcare facilities, community facilities etc.; potentially higher levels of sustainability; provision of affordable housing and specialist accommodation.

4.18 The moderate growth option comes with some risk associated with it, and the low growth option would increase this risk. The Inspector at examination in public may consider that we are failing to meet the development needs for the area. This could result in us failing the Duty to Cooperate as neighbouring authorities could object to our approach as the NPPF sets out that they need to plan for unmet needs of neighbouring authorities. This is considered unlikely as we are in ongoing discussions with our neighbouring authorities and expect to have Statements of Common Ground prepared and signed prior to submission of the Local Plan. Once past the Duty to Cooperate discussions the Inspector will consider the plan holistically, and potentially throw it out if they consider it unsound. A major contributor to this could be failing to meet the development needs for the area. Alternatively, the Inspector could pause the examination and ask us to do additional work to find more sites, delaying the plan and costing the Council financially as was the case with Welwyn Hatfield.

4.19 Delays to the Local Plan leaves the Council at risk of speculative applications being successful at appeal, as until we have an adopted plan with an agreed housing need figure and allocated sites we won't have a 5 Year Housing Land Supply in place. These speculative sites will not necessarily be in the most sustainable locations, but as seen with the recent appeal in Sarratt Inspectors may consider a failure to meet housing need outweighs other considerations such as Green Belt. As such, Officers consider it preferable to allocate strategic sites in the most sustainable locations whilst securing infrastructure benefits on the site as part of a moderate growth option.

4.20 As stated earlier in this report, the recent changes to the NPPF haven't yet been tested at examination. It is difficult to predict how the Inspector would interpret the changes at examination, however officers believe that the changes in policy wording will likely make little material difference.

<u>Non-housing allocations</u>

Employment

4.21 In addition to providing a significant increase in the quantum of new housing delivered, the economic development of the District needs to be considered. This includes meeting the projected need for a range of employment uses including office uses, industry and warehousing uses, public and community uses, leisure and tourism uses and main town centre uses.

4.22 Three Rivers has a thriving economy which has been growing at a strong rate supported by falling levels of unemployment. It has a strong creative industries sector (at Warner Brothers Studios and Langleybury) and a high concentration of knowledge-based industries, growth of these sectors should be encouraged.

4.23 The South West Herts Economic Study (2019) identified a need of 30,100 sqm office floorspace, however this has since been met by existing commitments at Croxley Park which delivered 36,363 sqm so there will in fact be an oversupply of 6,263 sqm. The Economic Study Update (2024) is currently being finalised, but we do not expect this position to change significantly. If there are any unexpected changes in the Economic Study Update these will be reported back to the Local Plan Sub-Committee in due course.

4.24 Although there will be an oversupply in office space during the plan period, the South West Herts Economic Study recommends that any loss of employment space be resisted due to low vacancy rates and increasing labour supply.

4.25 The Economic Study (2019) also identified a need for 28,800 sqm industrial and warehousing floorspace, however existing commitments will result in losses of 11,145 sqm floorspace so the requirement for these uses increases to 39,945 sqm which equates to 10ha employment land. As stated above the Economic Study Update (2024) is yet to be finalised. Early indications are that the requirement for industrial and warehousing space may be reduced from the 10ha requirement. As such, we may not need to plan for as much industrial and warehousing land as we did in 2021.

4.26 In the Regulation 18 Part 2 Sites for Potential Allocation document the existing employment allocations from the adopted Site Allocations Local Development Document (2014) were retained, adding small extensions to the Croxley Park employment area. We are not proposing any changes to this as our existing employment areas still need to be retained and protected.

4.27 In March 2024 the modified Article 4 Direction issued by the secretary of State came into force covering these employment sites and our town and district centres. This added the requirement for planning permission to be sought by applicants where permitted development rights otherwise would have applied, further protecting our employment areas.

4.28 An additional area covered by the Article 4 Direction is Leavesden Park employment area. Although this was not one of the previous employment allocations in the extant Local Plan, it was included in the Article 4 Direction. The evidence work in preparing the Article 4 Direction provides justification for protecting Leavesden Park for employment uses which is in line with the Economic Study findings stating that existing employment uses should be protected. Officers recommend that Leavesden Park is allocated as an additional employment area in the Local Plan. It should be noted that this allocation isn't proposing any new development, rather it is safeguarding existing employment uses.

4.29 The Part 2 Sites for Potential Allocation document included a new site at Lynsters Farm in Maple Cross that was proposed for industrial and warehousing uses. This site is 10.7 ha and would have met the 10ha requirement set out in paragraph 4.25 of this report. As we expect this figure to come down and Lynsters Farm is a large Green Belt site we propose removing this allocation. Officers will consider including only the brownfield element of the site or look at alternative locations and will report this to a future Local Plan Sub-Committee once the Economic Study update is completed and we have a more accurate idea of need.

4.30 The proposed employment allocation policy is in Appendix 3.

Warner Bros. Studios

4.31 The 2021 Part 2 Sites for Potential allocation document included an allocation for Warner Bros Studios at Leavesden. It was considered that the importance of the Warner Bros. Studios at Leavesden (WBSL) for the local and national economy and meant future operations of the Studios were safeguarded and that the pressures from the housing industry should not put the Studios at risk. The existing Leavesden Studios Operations allocation[1] was extended to include open land to the West and North West of the Backlot as part of the new Local Plan.

4.32 Paragraph 87 of the National Planning Policy Framework advises that planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, *creative* or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.

4.33 WBSL is a base for Warner Bros. productions but the quality and size of its facilities means it is able to host productions for other film studios and for the production of other TV shows that require the same kind of facility as film.

4.34 WBSL is a major employer with over 600 permanent full-time equivalent staff at the Studios and the Studio Tour while film productions can bring in up to 2,500 people to work at the Studios on these days. This makes WBSL one of the largest private-sector employers in South West Hertfordshire.

4.35 The Studio Tour has become a nationally important tourist attraction with over 1.8 million visitors a year.

4.36 The South West Herts Economic Study Update (2019) considered the requirement for land to support employment and economic activity across the functional economic market area (FEMA) which comprises Three Rivers, Dacorum, Hertsmere, St Albans and Watford.

4.37 It concluded that there is likely to be significant growth in demand for studio space over the next 15 years and that WBSL is therefore a key asset for South West Herts and key to the future growth of creative industries in the FEMA. Warner Bros has already invested significantly in Leavesden Studios and has further plans to expand.

4.38 As such, the Study recommends that as the WBSL is one of only a few locations in the UK where large scale film and TV productions can be made, is a key asset to the local and national economy and to the future growth of the creative industries in the area, the site should be expanded and developed.

4.39 In order not to compromise the ability of Leavesden Studios to contribute to the local and national economy, both as a local employer and as a centre to contribute to the economic growth of the District over the Local Plan period it is essential that land is allocated to allow the expansion of the studios and that a policy is in place to ensure that the land is safeguarded for that use.

4.40 Since the 2021 allocation some of the proposed allocation has already been built out, but the remainder of the site is recommended by Officers to remain as an allocation in the Regulation 19 document.

4.41 The updated draft Warner Bros. Studio allocation can be viewed in Appendix 4.

[1]As allocated in the Site Allocations LDD 2014

Town Centres and Retail

4.42 The South West Hertfordshire Authorities (Three Rivers, Dacorum, Hertsmere, St Albans and Watford councils) commissioned a joint Retail and Leisure[1] Study. This evidence base study provides the Councils with an objective assessment of retail and leisure development needs and a clear understanding of retail and leisure provision.

4.43 The South West Hertfordshire Retail & Leisure Study (2018) shows that Three Rivers has a relatively low market share across the South West Herts area. This reflects the findings of the previous studies undertaken in 2009 and 2012.

4.44 The Study provides recommendations on the provision for new retail floorspace over the Local Plan period to 2036, based on the growth population scenario of an additional 630 dwellings per year. The study identifies that there is likely to be a relatively small undersupply of convenience and comparison goods.

4.45 As we are no longer attempting to meet the 630 dwellings per annum (now 640 dpa) standard method target it will no longer be the case that there is an undersupply of convenience and comparison goods.

4.46 The Regulation 18 Part 2 Sites for Potential Allocation document identified town centre, district centre and local centres to be focused on town centre and retail uses giving priority to the shopping frontages. It should be noted that the Article 4 Direction covering our employment areas also covers the town and District centres.

4.47 Officers are not proposing any changes to the Town Centres & Retail Allocations as they consider that these uses need to be protected in order to ensure the vitality of our high streets.

4.48 The retained draft retail allocations can be viewed in Appendix 5.

Gypsies, Travellers and Travelling Showpeople

4.49 An update to the Traveller Needs Assessment was undertaken in light of the changes to the definition of Travellers for planning purposes set out in the 'Planning policy for traveller sites' (PPTS) published in August 2015. The change to the definition essentially meant that where gypsies and travellers had permanently ceased a nomadic way of life they were no longer included in the provisions of the policy.

4.50 The updated assessment is now out of date with the definition having reverted to its pre-2015 version. An update to the Gypsy and Traveller Accommodation Assessment is underway, the results of which will be reported to a future meeting of the Local Plan Sub-Committee.

Education

4.51 The Council is in ongoing discussions with Hertfordshire County Council regarding the District's education needs. Further engagement will come through work on the Infrastructure Delivery Plan which is currently underway.

4.52 From these discussions County has informed officers of identified need in Carpenders Park which will deal with local need but also help with need from Watford and to a lesser extent Hertsmere. County own a site in Carpenders Park which was a proposed secondary school allocation in the Regulation 18 Part 2 consultation. Officers recommend that this site remains a proposed allocation in

the Regulation 19 Document despite falling into an area of 'very high' Green Belt harm. Officers consider the need for education is such that it outweighs the harm to the Green Belt and constitutes exceptional circumstances for the revision of Green Belt boundaries.

4.53 The Regulation 18 Part 2 consultation also included the existing primary school allocation at Woodside Road. This allocation from the extant Local Plan has not yet been built out so Officers propose for this to be carried through to the Regulation 19 consultation.

4.54 County have also identified a need for a secondary school in the Abbots Langley / Kings Langley area to address need from Three Rivers and Dacorum. To date no suitable site has been found for a school in the area so we are unable to allocate a site at this stage. Should County propose a new site this will be reported to the Local Plan Sub-Committee in due course.

4.55 Additional need for new school places resulting from new development in the Local Plan will be considered in the Infrastructure Delivery Plan and will be delivered through developer contributions with potential for on-site provision on larger strategic sites of circa 500 dwellings or more.

4.56 The proposed education allocation policy is in Appendix 6.

Open Space

4.57 The Open Space, Sport & Recreation Study (OSSR) determines the provision and quality of existing facilities, identifies any surplus or deficiencies of provision, and establishes the likely future needs. The Open Space Assessment formed part of this study considering the following typologies: parks and gardens, natural and semi-natural green spaces, amenity green space, provision for children and young people, allotments, cemeteries and church yards.

4.58 It is important to note that only sites that are publicly accessible are included in the study (i.e. private sites or land, which people cannot access are not included).

4.59 In accordance with best practice recommendations, a size threshold of 0.2 hectares is applied to the inclusion of some typologies within the study. Sites of a smaller size, particularly for the typologies of amenity greenspace and natural and semi-natural greenspace tend to have a different role. Often this is for visual purposes (e.g. small incremental grassed areas such as highway verges) and is therefore considered as offering less recreational use in comparison to other forms of open space.

4.60 The Regulation 18 Part 2 Sites for Potential Allocation document proposed that existing open space allocations should remain as such whilst proposing two new open space allocations as parts of sites CFS28 and OSPF6 at Warner Bros. Studios in Leavesden. These can be viewed in Appendix 4.

4.61 Future Open Space provision will be considered against the Open Space, Play Space, Sport and Recreation policy in the emerging plan. This sets out that future development proposals will be required to contribute to new provision of open space and children's play space where justified by the scale of development. Site-specific comments on the potential housing sites in the plan will identify where a potential housing site would be required to contribute to open space and play space provision.

4.62 The location of new future provision of open space and play space depends on a District Council decision on housing site allocations and on planning permissions that may be granted both for windfall sites and future allocation sites (where such provision is required). As the designation of any new open and play spaces through future development proposals is uncertain, it is intended for any new open spaces and play spaces to be allocated as public open space and be included in the Policies Map at the nearest appropriate and possible time.

4.63 The open space allocation policy can be viewed at Appendix 7, with a PDF map of the District and open space allocations at Appendix 8 for ease of zooming in.

Maple Lodge Wastewater Treatment Works

4.64 Maple Lodge Wastewater Treatment Works was allocated as a 'significant infrastructure site in the Green Belt' in the extant Local Plan and the allocation was carried over into the Regulation18 Part 2 document. However, this technical definition no longer exists.

4.65 In their consultation responses Thames Water requested the site be removed from the Green Belt. Officers believe the site makes no contribution to the purposes of the Green Belt and as a significant piece of infrastructure should not be restricted by Green Belt policy. As such, Officers are proposing to remove the site from the Green Belt, no other changes are proposed.

4.66 The Maple Lodge Wastewater Treatment Works allocation can be viewed in Appendix 9.

<u>Villages in the Green Belt</u>

4.67 The NPPF states that:

- Where it is necessary to restrict development in a village primarily because of the important contribution which the open character of the village makes to the openness of the Green Belt it should be included in the Green Belt and

- Where the character of the village needs to be protected for other reasons then measures such as Development Management Policies should be used and the village should be excluded from the Green Belt.

4.68 This means that villages should only be included in the Green Belt if the open character of the village makes an important contribution to the openness of the Green Belt and those that do not should be 'inset'.

4.69 Therefore, an analysis of settlements within the Green Belt is required by the NPPF to determine whether there remains a case for keeping them 'washed over' by the Green Belt, by virtue of their contribution to Green Belt purposes in respect of helping to maintain openness. It is also important to undertake this exercise as part of the broader review of Green Belt purposes, where the settlements can be put into their wider context.

4.70 Where it is determined that it remains necessary to restrict development in a village primarily because of the important contribution to the openness of the Green Belt, the village will retain its Green Belt designation. Any planning applications within these villages would therefore continue to be considered against national Green Belt policies and development is therefore strictly controlled, which helps to ensure that the contribution these villages make to the

openness of the Green Belt is maintained rather than being slowly eroded over time.

4.71 Where it is determined that it is not necessary to restrict development in a village primarily because of the important contribution to the Green Belt, then a new boundary is drawn around the village. The village would therefore be referred to as being 'inset'.

4.72 The restrictions set by national Green Belt policy, would therefore not apply in these villages, as new buildings here are not considered to harm the openness of the Green Belt. Therefore, any extensions and replacement buildings would fall outside the scope of the Green Belt policy.

4.73 The Stage 1 Green Belt Review was a strategic review of Green Belt purposes. It is complemented by an exploration of the character and role of villages within the Green Belt, drawing conclusions on the suitability for the continued and potential in-setting of villages within the Green Belt, as required by paragraph 140 of the NPPF.

4.74 The Stage 1 Green Belt Review reviewed the 'washed over' villages of Heronsgate, Sarratt and Bedmond (using the settlement boundaries as defined in the Core Strategy 2011) against Green Belt purposes. The findings were that Heronsgate and Sarratt were judged to have sufficient openness to make a positive contribution to Green Belt purposes, but in the case of Bedmond it was concluded that the compact form, density and variable relationship with the Green Belt of Bedmond prompts a case for the village to be 'inset'.

4.75 The inset boundary of Bedmond was consulted on as part of the Regulation 18 Part 2 Sites for Potential Allocation document in 2021. In addition to this, three housing sites were proposed for allocation at the edge of the 'inset' village core. Following the submission of additional sites during the 2021 consultation. The Additional Sites for Potential Allocation replaced two of the Bedmond sites with preferred two sites that were considered more suitable. It was considered that merely adding the two new sites would have led to a cumulative impact that would have been inappropriate in terms of housing numbers for a village location.

4.76 As a result of our approach to Green Belt constraint, site CFS56 (Church Hill Road) was removed as it fell into an area above moderate Green Belt harm. Officers are now proposing that CFS10 (Land between Millhouse Lane and Bell Lane) from the 2021 consultation is brought back into the plan as it was removed on the basis of cumulative effect and with another site having been removed this would no longer be the case.

4.77 The map of the potential Bedmond sites and 'inset' area can viewed at Appendix 10. The SHELAA forms for the three potential Bedmond site allocations are in appendices 13 to 15.

5 Options and Reasons for Recommendations

5.1 The recommended approach set out in this report would result in a moderate level of growth resulting in circa 450 dwellings per annum. The high growth option of circa 637 dwellings per annum would result in large amounts of Green Belt release and would lead to unacceptable harm to the Green Belt. The low growth option of circa 270 dwellings per annum would result in us failing to meet other needs beyond merely the quantum of housing, especially the need for affordable housing.

5.2 The moderate growth approach balances the development needs of the area with protecting the Green Belt, for this reason officers recommend this option.

6 Policy/Budget Reference and Implications

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

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

None specific.

8 Financial Implications

None specific.

9 Legal Implications

9.1 None specific.

10 Risk and Health & Safety Implications

10.1 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.

10.2 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' a 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

10.3 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.

Likelihood (Very Likely → Remote)				
	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
	Impact: Low → Unacceptable			

Impact Score	Likelihood Score
4 (Catastrophic)	4 (Very Likely (≥80%))
3 (Critical)	3 (Likely (21-79%))
2 (Significant)	2 (Unlikely (6-20%))
1 (Marginal)	1 (Remote (≤5%))

10.4 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.

11 Recommendation

11.1 That the Local Plan Sub Committee:

11.2 Note the contents of this report;

11.3 Agree the moderate housing growth option 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 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;

11.4 Agree the non-housing allocations as set out in this report;

11.5 Agree the insetting of Bedmond within the Green Belt; and

11.6 Agree site CFS10 as a site for potential allocation in addition to the two Bedmond sites included in the Regulation 18 Part 4 Lower Housing Growth Option.

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

Background Papers

National Planning Policy Framework (2023)
Planning Practice Guidance
Core Strategy (2011)
Site Allocations LDD (2014)
Local Housing Needs Assessment (2020)
Economic Study (2019)
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)
Regulation 18 Part 4: Lower Housing Growth Option (2023)
Potential Sites consultation (2018)
Regulation 18 Issues & Options consultation (2017)
Levelling-up and Regeneration Act: reforms to national planning policy (2023)
Strategic Housing & Employment Land Availability Assessment (2020)
Strategic Housing & Employment Land Availability Assessment Addendum (2023)
Urban Capacity Study (2020)

Appendices

Appendix 1 – Local Plan Regulation 18 Part 4 Consultation Summary
Appendix 2 – Detailed Statutory Consultee Summaries
Appendix 3 – Proposed Employment Allocations
Appendix 4 – Proposed Warner Bros. Studios Allocation
Appendix 5 – Proposed Town Centres and Retail Allocations
Appendix 6 – Proposed Education Allocations
Appendix 7 – Proposed Open Space Allocations
Appendix 8 – Open Space Allocations Map
Appendix 9 – Proposed Maple Lodge Wastewater Treatment Works Allocation
Appendix 10 – Proposed Bedmond Insetting in the Green Belt
Appendix 11 – Statutory Consultee Responses to non-housing allocations
Appendix 12 – Summary of Public responses for non-housing allocations
Appendix 13 – SHELAA form site NSS6a - North Cott, East Lane
Appendix 14 – SHELAA form site NSS2 - 56 High Street Bedmond
Appendix 15 - SHELAA form site CFS10 Land between Millhouse Lane and Bell Lane

THREE RIVERS
DISTRICT COUNCIL

Local Plan

Summary of the “Three Rivers’ Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land (Part 4) Regulation 18 Consultation

June 2024

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2. Previous Regulation 18 Consultations

3. Part 4 Regulation 18 Consultation (October – December 2023)

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Appendix 1 – Summary of Statutory Consultee Comments

1.0 Introduction

1.1 Three Rivers District Council (TRDC) is preparing a new Local Plan, which will eventually replace the current Core Strategy (2011), Development Management Policies LDD (2013) and Site Allocations LDD (2014).

1.2 In October 2023, TRDC undertook the "Three Rivers' Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land" (Part 4) Regulation 18 consultation.

1.3 This statement summarises the Part 4 consultation including how we consulted, who was invited to make representations, the comments that were received and the concerns raised, all of which have influenced the preparation of the emerging Local Plan.

2.0 Previous Regulation 18 Consultations

2.1 Prior to the part 4 consultation, TRDC undertook three Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18) consultations, as detailed below:

- Local Plan 'Issues & Options and Call for Sites Consultation Document', July 2017
- Local Plan "Preferred Policy Options" (Part 1) and "Sites for Potential Allocation (Part 2)" Document, June 2021
- Local Plan "Additional Sites for Potential Allocation" (Part 3), January 2023

3.0 Three Rivers' Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land" (Part 4) Regulation 18 consultation.

3.1 The consultation methods adopted by the Council were in accordance with the Councils Statement of Community Involvement, (June 2021).

3.2 The consultation ran from Friday 27 October 2023 for a period of six weeks, ending on Sunday 10 December 2023. Emails were sent to almost 1600 people and organisations registered on the local plan consultation database, including statutory consultees, site owners and developers, and members of the public. The consultation was advertised in the Watford Observer and online through the Three Rivers District Council website and social media. Leaflets were also delivered to households across the district to inform residents about the consultation and encourage them to respond. For the first time in the process of making the new Local Plan, the Have Your Say platform was used, and the majority of responses were received through this form. A small number of letter and email comments were also received.

3.3 A total of 17,036 formal responses were received from 957 respondents (26 Statutory Consultees, 31 Landowners/Developers and 900 general public) through the part 4 consultation. Respondents included residents, statutory and non-statutory consultees and other interested groups and organisations. 1153 responses were received by post or email and 15,883 responses were received through the online consultation form.

3.4 Public Respondents

3.5 Within the Have Your Say platform, public respondents were asked a series of optional questions to help to understand the demographic makeup of respondents. It is important to note that representations sent via email and letters did not contain demographic information.

3.5.1 The 'about me' section (see Figure 1 below) indicated that a large majority of respondents using the Have Your Say platform were residents in the Three Rivers District. A large amount were also those that own a property in Three Rivers while there were a smaller number of those who own a business, worked or were a student in the area.

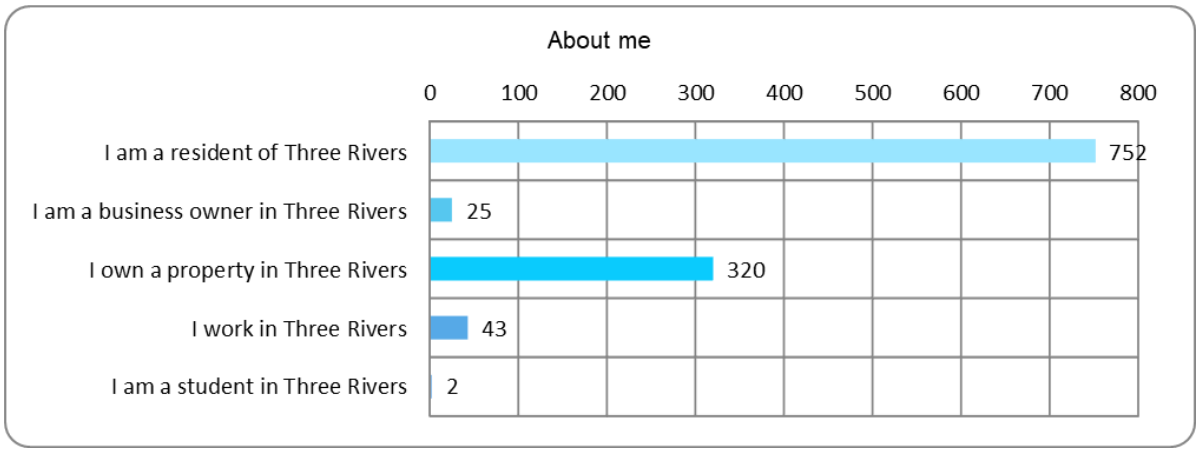

Figure 1. Summary of "about me" section within the Have Your Say platform

3.5.2 In terms of age, respondents (from Have Your Say) by decade born shows a large generational disparity between respondents (see Figure 2 below). Well over half of all public responses (from Have Your Say) came from those born prior to 1970 and as few as 21 came from those born from 1990 onwards. The largest group was those born between 1950 and 1959 with a total of 240. It is evident from Figure 2 that there has been a lack of engagement from young people and further efforts need to be made to encourage young people to comment, given that they may have differing viewpoints and priorities.

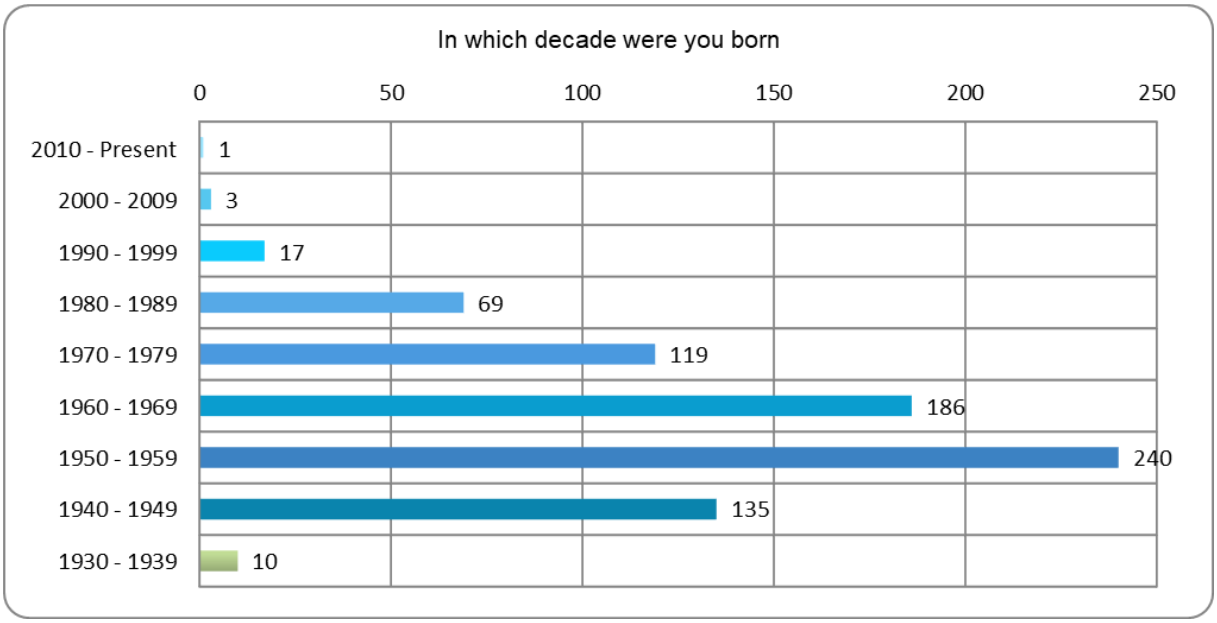

Figure 2. Summary of the decades in which the Have Your Say respondents were born

3.5.3 In terms of gender, the majority of respondents identified as a man, while there were 133 fewer responses from those who identified as a woman (see Figure 3 below).

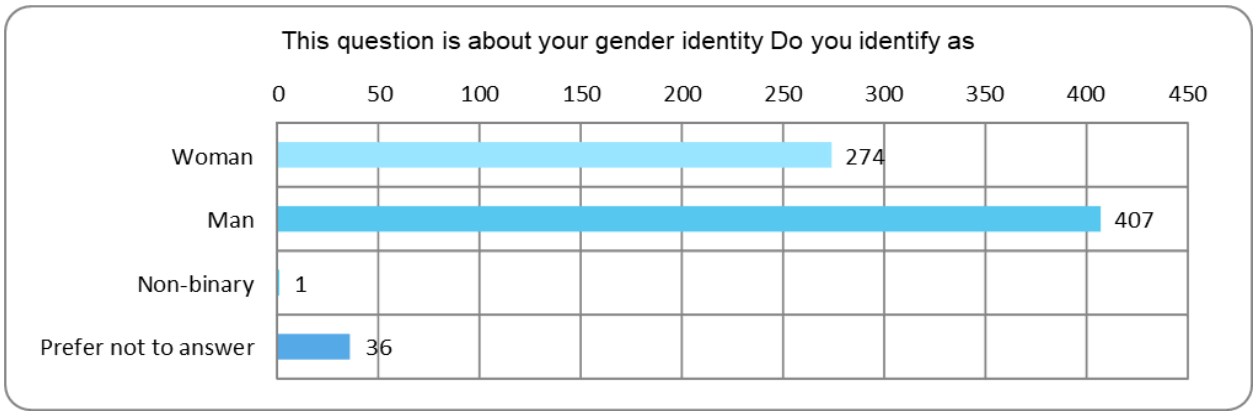

Figure 3. Summary of the gender identity of the Have Your Say respondents

3.5.4 In terms of ethnicity (see Figure 4 below), a large majority of respondents described themselves as White-British. The next largest ethnicity was those who described themselves as Asian or Asian British-Indian with a total of 46 respondents. This generally aligns with the ethnic breakdown of the district, which is predominantly White (77.1%) followed by the second largest ethnicity group "Asian British" (15.2%)[1]. However, it must be noted that minimal representations were received from other ethnic minority groups such as Chinese and Black/Black British.

[1] https://cdn.threerivers.gov.uk/files/2023/12/b46b2810-9f22-11ee-b0f6-2594c895ecd8-Equality%2C%20Diversity%20and%20Inclusion%20Policy%202023-26.pdf

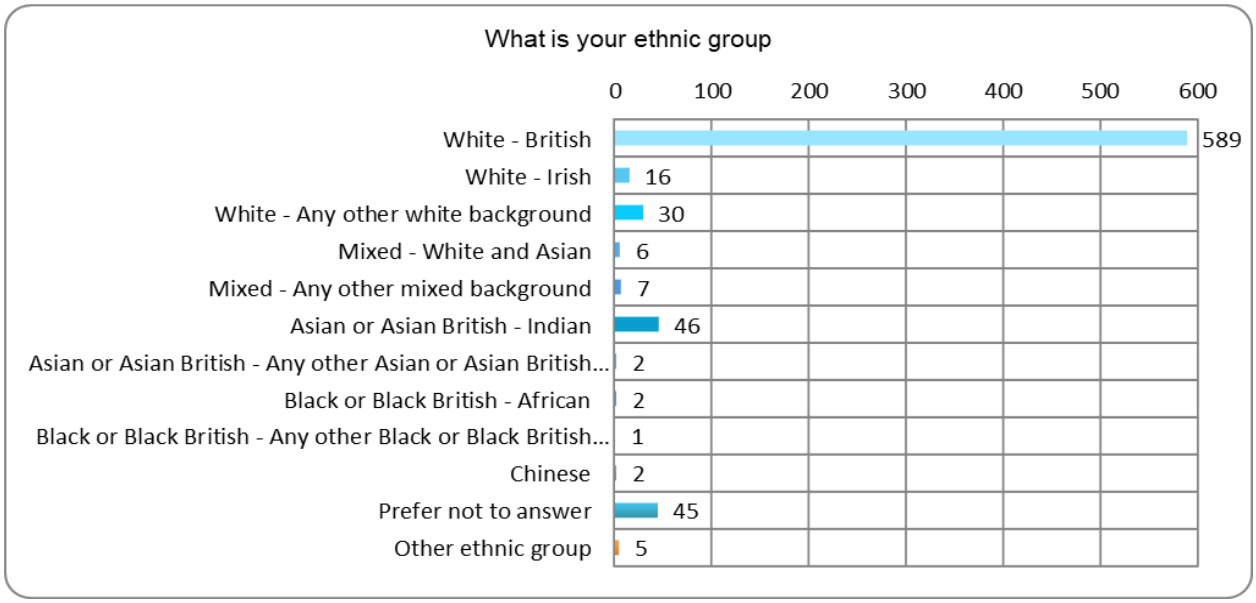

Figure 4. Summary of the ethnicity of the Have Your Say respondents

3.5.5 Have Your Say respondents were also asked what the beginning of their postcode was to ascertain which specific areas in the district responses were coming from. Additionally, to be accepted letters and emails had to include the address of the respondent. As set out in Figure 5 below, the area with the largest number of responses was Croxley Green, with a total of 241. Chorleywood, Rickmansworth and Carpenders Park also provided a high number of responses with 149, 103 and 77 respectively. A total of 20 responses originated from outside of the district.

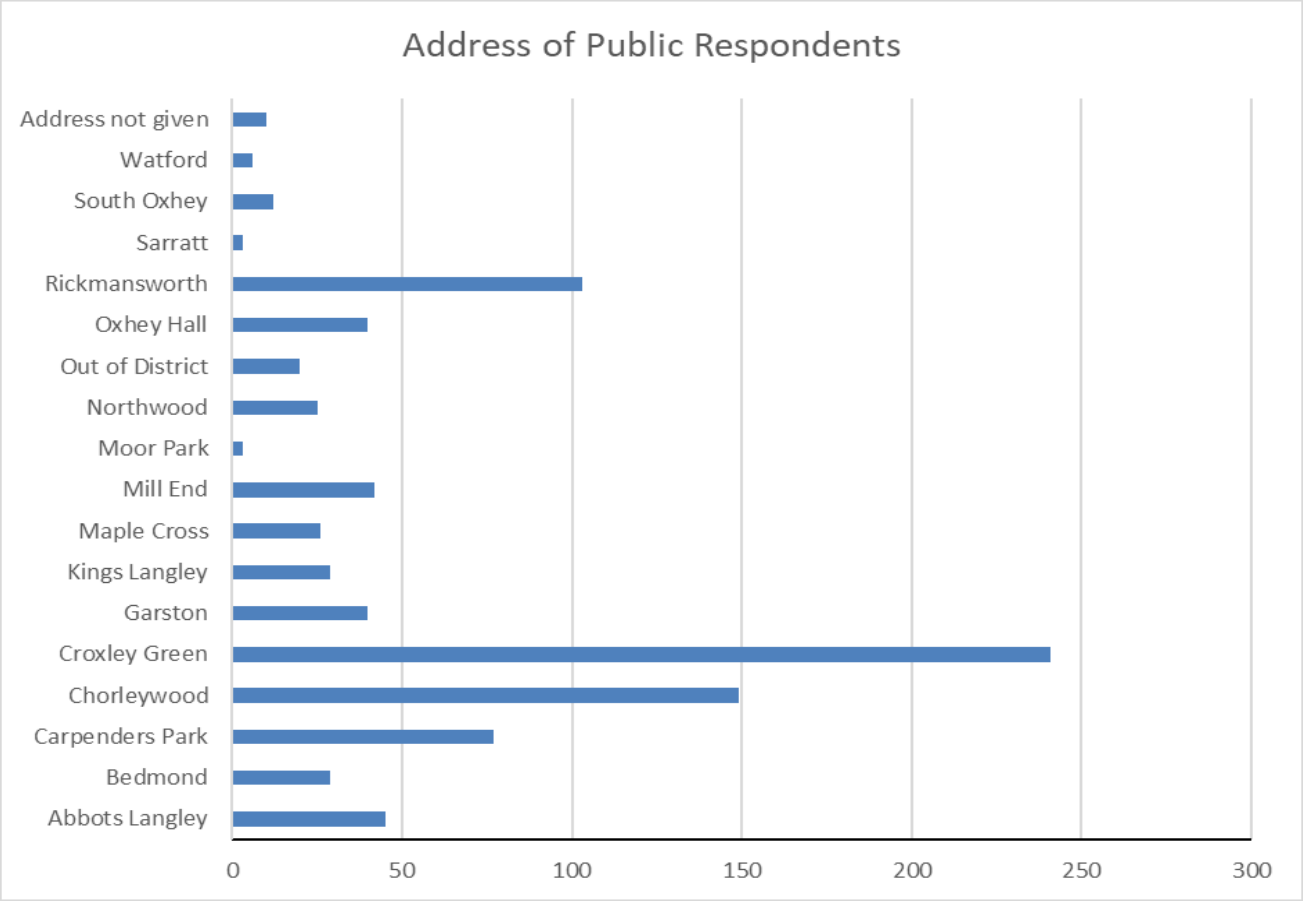

Figure 5. Summary of addresses of all public respondents (Have Your Say platform, emails and letters combined)

3.6 <u>Statutory Consultee Responses</u>

3.6.1 The statutory consultee's responses related to their areas of expertise and identified mitigation measures to be considered as part of new developments.

3.6.2 With regards to services operators including National Grid, National Gas, Affinity Water and Thames Water, these statutory consultees remained neutral or generally did not provide comments for questions 1-6. However, Thames Water did set out that as a result of the low growth approach, overall, the reduced levels of development would have a lesser impact on the sewerage network and capacity at sewage treatment works, although localised network upgrades are likely to be required. Affinity Water stated that "*the pressures at the critical points in the network due to the new developments are such that major reinforcements in the network in the Three River District Council area will be required. This normally means new pipelines although in some cases new pumping stations will also be required. There is sufficient water supply in the region".* Affinity Water also highlighted growth in nearby neighbouring authorities which would increase demand further.

3.6.2.1 Services operators including Affinity Water and Thames Water provided site specific comments. Affinity Water listed sites within different categories including those within "Groundwater Source Protection Zones", "significant mains apparatus within site", "significant mains apparatus in the vicinity of site boundaries" and "existing sites with current distribution mains" and provided guidance for each category. Thames Water

also provided comments for each site listed within the part 4 consultation. Overall, Thames Water set out they “do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability” for all of the sites, including the two strategic sites.

3.6.3 Six neighbouring authorities provided comments on the Part 4 Regulation 18 consultation including Watford Borough Council, Dacorum Borough Council, Buckinghamshire Council, St Albans District Council, Hertsmere Borough Council and Harrow Council.

3.6.3.1 Harrow Council was the only neighbouring authority to generally agree with Three Rivers’ non-compliance with the Standard Method and low growth approach, concluding that the “London Borough of Harrow no longer hold an objection to this aspect of the plan” (release of Green Belt, particularly sites near the shared boundary).

3.6.3.2 Whilst Watford Borough Council, Dacorum Borough Council, St Albans District Council and Hertsmere Borough Council did not outright answer “no” to questions 1-4, they raised concerns regarding TRDC’s non-compliance with the Standard Method figure, that neighbouring authorities would likely not be able to meet any unmet need and the potential un-soundness of the plan as a result of the proposed housing figures. It was advised that a robust justification and evidence would be required for the low growth approach. The importance of further Duty to Co-operate work was also emphasised. Watford Borough Council also provided site specific comments for the following proposed sites, a summary of which can be seen below:

H6 Hill Farm Industrial Estate Leavesden:

No objections to residential development, however, raised concerns about a shortfall of industrial land in Watford with only 25% of its need being met through site allocations and that the loss of TRDC industrial land will not positively contribute to resolving this shortfall. Welcome protection and allocation of land for industrial use.

CFS4 Land at Warren Court, Woodside Road:

Whilst the site is not presently used for allotments, there may be a shortfall for allotments in North Watford. Would welcome dialogue regarding meeting shared objectives.

NSS10 Land at Mill Place, Hunton Bridge:

Important to integrate the canal setting into the design of any future development.

CFS61 Cinnamond House:

Would like Three Rivers to consider if there are implications for site CFS61 and delivery of Watford to Croxley Link (W2CL) and referred to site MU18 in the Watford Local Plan which safeguarded an area of land to support a mass rapid transport interchange/station.

3.6.3.3 Buckinghamshire Council specifically answered “no” to question 1 referring to potential consequences of LPA’s not meeting the level of housing growth set out by

the Standard Method and set out that there is no scope for Buckinghamshire to meet any unmet need. With regards to potential sites, Buckinghamshire Council stated that **EOS12.4 Land West and South of Maple Cross** is not an appropriate development site, citing potential transport impacts. They requested that Buckinghamshire Council is involved in preparation of transport evidence at the site.

3.6.4 Three Parish Councils from within Three Rivers provided comments including Chorleywood Parish Council, Croxley Green Parish Council and Watford Rural Parish Council. A further three Parish Councils from outside of the district also provided comments to the part 4 consultation including Nash Mills Parish Council, Denham Parish Council and Chalfont St Peter Parish Council. All six of the Parish Councils agreed with TRDC not complying with the Standard Method calculation and the low growth approach. The justification for this included referencing the NPPF, that the Standard Method is not an appropriate way to calculate housing need, that the approach would protect the Green Belt and reduce stress on local infrastructure and services.

3.6.4.1 With regards to comments on specific sites, Chorleywood Parish Council provided comments on **CFS16 Land at Chorleywood Station** (neither agrees or disagrees that this site is an appropriate development site, however raised concerns), **CFS18c Hill Farm, Stag Lane** (agree that the site is an appropriate development site, however raise concerns). Some of the concerns for the sites included:

- Request a Master Plan and site layout plans prior to allocation within the plan
- Concerns about impact on character and Conservation Area
- Concerns about potential loss of station car parking
- Concerns about impact of railway on new residents
- Access, parking and highway safety concerns
- Concerns regarding potential loss of Public Right of Way and request buffer.
- Concerns about impacts to wildlife
- Concerns about whether the location is sustainable, particularly in relation to pedestrians and cyclists
- A defensible boundary of Green Belt should be retained
- Need further investigation with regards to sewerage capacity
- Concerns regarding density
- Infrastructure concerns

3.6.4.2 Chorleywood Parish Council also provide comments for **NSS23 Chorleywood Telephone Exchange, ACFS1 Heath House Rickmansworth Road, CW9 Garages at Copmans Wick** and **P4a Quickwood Close Garages.** The Parish Council did not raise objections to these sites.

3.6.4.3 Croxley Green Parish Council stated that the following sites were appropriates sites for development; **CFS 20 Land at Croxley Station, CG16 Garages Owen's Way, CG47 Garages off Grove Crescent, H9 33 Baldwins Lane** and **CFS61 Cinnamond House**. However, concerns were raised for these sites including:

- Concerns relating to parking and loss of station parking
- Concerns regarding density and height
- Suggested infrastructure improvements such as a medical centre
- Requires open space provision
- Concerns about loss of garages as a vital resource for the community

3.6.4.4 Croxley Green Parish Council objected to site CG65 British Red Cross for the following reasons:

- Objects in strongest possible terms
- It is a community asset at the heart of the community
- TRDC's own Indoor Leisure Needs Assessment states that the projected growth in housing development is likely to lead to the need for additional spaces for indoor activity

3.6.4.5 Watford Rural Parish agreed that **BR20 Northwick Day Centre, CFS12 Kebbell House and H24 The Fairway** are appropriate development sites.

3.6.4.6 Watford Rural Parish objected to sites **AS13 Garages at Blackford Road, AS31 Garages at Woodhall Lane, and PCS16 Vivian Gardens.** Concerns included:

- Loss of parking at garage sites, access issues and impact on highway safety
- Loss of privacy and impact on neighbouring amenity
- Over development and impact on character
- Impact on wildlife and trees

3.6.4.7 Chalfont St Peter Parish Council objected to site **EOS12.4 Land west and south of Maple Cross** citing that the site is not sustainable, access and highway safety concerns and the impact on the Green Belt.

3.6.4.8 Denham Parish Council objected to sites **EOS7.0 Land to the south of Shepherds Lane and east of the M25** and **EOS12.4 Land west and south of Maple Cross** citing traffic and infrastructure concerns.

3.6.5 Hertfordshire County Council Growth and Infrastructure and other County Council departments provided their comments during the Part 4 consultation. A summary can be seen below. With regards to questions 1-4, HCC stated that they are "*concerned that the land for homes allocated in this consultation draft is too low. The local planning authority should satisfy itself that it is planning for the appropriate number of new homes that are needed in its administrative boundary, on the basis of national policy requirements, a robust technical evidence base and best-practice".*

<u>Adult Care Services:</u>

Suggested a general requirement for provision of older persons housing. Adult Care Services (ACS) provided some site specific comments. For medium sized sites, ACS suggested "*that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable*". For larger sites such as **EOS7.0 Land to the south of Shepherds Lane and east of the M25** and **EOS12.4 Land west and south of Maple Cross**, ACS "*recommends the inclusion of one extra-care facility comprising of 70-80 self-contained units*".

<u>Children Services:</u>

Suggested that the larger sites including **EOS7.0 Land to the south of Shepherds Lane and east of the M25** and **EOS12.4 Land west and south of Maple Cross** should provide up to 2FE of new primary phase provision on site.

Public Health:

The County Council would be keen to engage on public health related policies.

Hertfordshire Fire and Rescue Services:

HFRS current capacity is sufficient.

Promote in-built fire suppression systems within new development.

Transport:

Did not object to any of the sites, however, access concerns were raised for some sites including **AB18 Garages Parsonage Close, AB32 Yard off Tibbs Hill Road, NSS66a North Cott East Lane, CFS18c Hill Farm, CFS3 Land adjacent to Fraser Crescent and Woodside Road, CFS6 Land at Mansion House Equestrian Centre, PCS21 Land at Love Lane** with HCC requesting a compliant access strategy to be agree with the highway authority or remedial works to be undertaken.

For site **CFS65 Land North of Bucknalls Lane**, HCC Transport set out the following:

"As stated in the previous representation it is not clear how the proposed site-specific requirement for an access from the A405 can align with plan policy, and would be resisted by the highway authority on a range of policy and technical grounds.

Any policy specifying modal links should be with the agreement of the highway authority.

A plan compliant access strategy for the site should be agreed prior to inclusion in the plan.

The Active and Safer Travel Team suggested that high quality active travel links should be provided to enable access within the recommended accessibility criteria of 400m to the closest bus services currently run along A405".

For the larger sites including **EOS7.0 Land to the south of Shepherds Lane, east of the M25 EOS12.4 Land west and south of Maple Cross and CFS3 Land adjacent to Fraser Crescent and Woodside Road,** Hertfordshire County Council suggest that a bus strategy for the site will need to be developed and that the quantum of development proposed should enable some degree of service improvement.

Ecology:

Did not identify any “fundamental ecological constraints” within any of the proposed sites. Provided advice where appropriate to specific sites on BNG and ecological enhancements.

Historic Environment:

Did not raise an objection to any of the proposed sites, however, where relevant provided site specific comments advising archaeological assessments or planning conditions.

LLFA:

The LLFA provided site specific comments providing guidance on flood risk and whether flood risk assessments would be necessary and provided guidance on drainage solutions where necessary.

With regards to site **CFS61 Cinnamond House,** the LLFA stated “*we do not think this site is appropriate for development unless it can pass the sequential test and suitable mitigation provided for the substantial surface water flood risk on site. This is likely to require a significant amount of attenuation which may reduce the quantum of housing*”.

Waste and Minerals:

Did not object to any of the sites. Site specific comments including advising Site Waste Management Plans, opportunistic extraction and submission of a mineral resource assessment where appropriate.

3.6.6 Infrastructure providers including the HWE ICB, National Highways and TFL provided comments. A summary of their comments can be seen below:

HWE ICB:

HWE ICB raised the following concerns:

- That the low growth approach may delay the Local Plan and impacts of this on service provision
- Disappointing that identified sites have largely shifted away from the most sustainable locations within the district to small and larger sites in settlements lower down the settlement hierarchy.
- Potential cumulative impacts of small sites with lack of developer contributions

HWE ICB stated that they would apply for developer contributions for a number of medium-scale sites. For larger sites, HWE ICB requested the provision of an on-site medical facility, including **EOS7.0 Land to the south of Shepherds Lane and east of the M25** and **EOS12.4 Land west and south of Maple Cross**.

National Highways:

Remained impartial on the low growth approach.

Set out that they will require an assessment of the cumulative impacts of the non-consented development proposals within the plan and that the level of development would not affect the safe and reliable operation of the strategic road network.

National Highways advised that the larger sites would have to provide a transport assessment and sustainability reviews at a planning application stage.

TFL:

Provided no comments on TRDC's approach or any site-specific comments. Stated that as a landowner for some proposed sites, Places for London will send a separate response representing TfL's interests.

3.6.7 Other statutory consultees which provided comments included Historic England, Canal and River Trust, Environment Agency and Natural England. A summary of their comments can be seen below:

Historic England:

Did not object to any of the proposed sites, however, where relevant, provided advice on specific sites including requesting the submission of a Heritage Impact Assessment prior to the Regulation 19 consultation or to include recommendations of Heritage Impact Assessments within policy wording.

Canal and River Trust:

The Canal and River Trust did not object to the principle of any of the proposed sites, however, provided site specific comments where relevant and the need to fully consider potential impacts on the canal corridor (character and water quality etc) and infrastructure.

Environment Agency:

The Environment Agency did not object to the principle of any of the proposed sites, however, did provide site specific comments where necessary, including at sites **ACFS8b Flower House 2-3 Station Road, H22a Depot Stockers Farm Road** and **CFS12 Kebbell House and Land to Rear of Delta Gain**. Their comments provided guidance including the establishment of buffer zones and watercourse improvements.

Natural England:

Provided advice for developments of 100+ dwellings within the Zone of Influence of Chilterns Beechwoods Special Area of Conservation (SAC).

Provided advice that some sites could fall within a possible future boundary variation to the Chilterns AONB. The sites include:

- **AB18 Garage Courts Parsonage Close**
- **NSS2 56 High Street, Bedmond**
- **NSS6a North Cott East Lane**
- **NSS10 Land at Mill Place, Hunton Bridge**
- **CFS59 Land on London Road**

3.7 Landowner/ Promoter Responses

3.7.1 The majority of landowner/promoter responses did not agree with Q1 relating to TRDC not complying with the Standard Method. Similarly, the majority of landowner/promoter responses did not agree with Q3 relating to TRDC's low growth approach. It must be noted that most of the landowner/promoter responses were from representatives of sites which had been rejected from the Local Plan process, particularly due to the Council's Green Belt approach. Most of these responses pushed their own sites for allocation, however, a number of consistent themes were raised which are set out below.

3.7.2 Several consistent themes and arguments were raised within the landowner/promoter responses:

- The Council's approach is not justified, effective or consistent with national policy, including requirement to meet objectively assessed need.

- Having reviewed the scope of the brownfield sites, the Council has enough evidence to support the exceptional circumstances needed to justify changes to the Green Belt boundary in the district.

- The current Green Belt Review is not sufficiently detailed or precise to justify the Council's position. It relies on the assessment of large parcels of land, rather than specific sites. A more fine-grained approach is needed.

- There is a pressing need for housing within the District, particularly affordable housing.

- Concerns raised over social, economic and environmental impacts of lower growth housing figure.

- The benefits of the high growth option are recognised within the Sustainability Appraisal Working Note.

- Shortage of supply in the district has impacted affordability.

- Concerns that the level of shortfall compared to the Standard Method would make the plan unsound.

- The low growth approach would not meet the needs of surrounding authorities and could impact upon duty to co-operate requirements.

- Reference to TRDC's HDT score of 46%.

- Reference to TRDC's 1.9 year Housing Land Supply and history of under delivery of housing.

3.7.3 The following sites received objections from other landowners/promoters.

- **CFS65 Land North of Bucknalls Lane** – Concerns raised due to location near waste facility.

- **CFS16 Land At Chorleywood Station** – Concerns that the site is constrained by the existing railway, the requirement to retain parking provision and protected trees, and concerns were raised over viability and ability to accommodate 190 dwellings.

- **EOS12.4 Land West and South of Maple Cross** - Concerns were raised with regards to flooding, the site being within a source protection zone and concerns about deliverability and build-out rates.

- **EOS7.0 Land to the South of Shepherds Lane and East of the M25** – Concerns about the site being location within source protection zone.

- **CFS40a Land at Park Road** - Concerns about deliverability and viability of the site, TPO's and capacity limits.

- **CFS20 Land at Croxley Station** – Concerns relating to dwelling capacity and that the loss of the timberyard should be considered.

- **CG65 British Red Cross** – Hertfordshire County Council (in a landowner capacity) had concerns regarding impact on access and parking for library.

- **CFS61 Cinnamond House** – Concerns that the site is located within a source protection zone and flooding concerns.

3.8 <u>Public Responses</u>

3.9 A large majority of public respondents (including responses received from Have Your Say platform, emails and letters) agree with the Council's proposed stance of not complying with the Government's Standard Method (see Figure 6 below). In total, 789 respondents agreed with this approach whilst 72 did not.

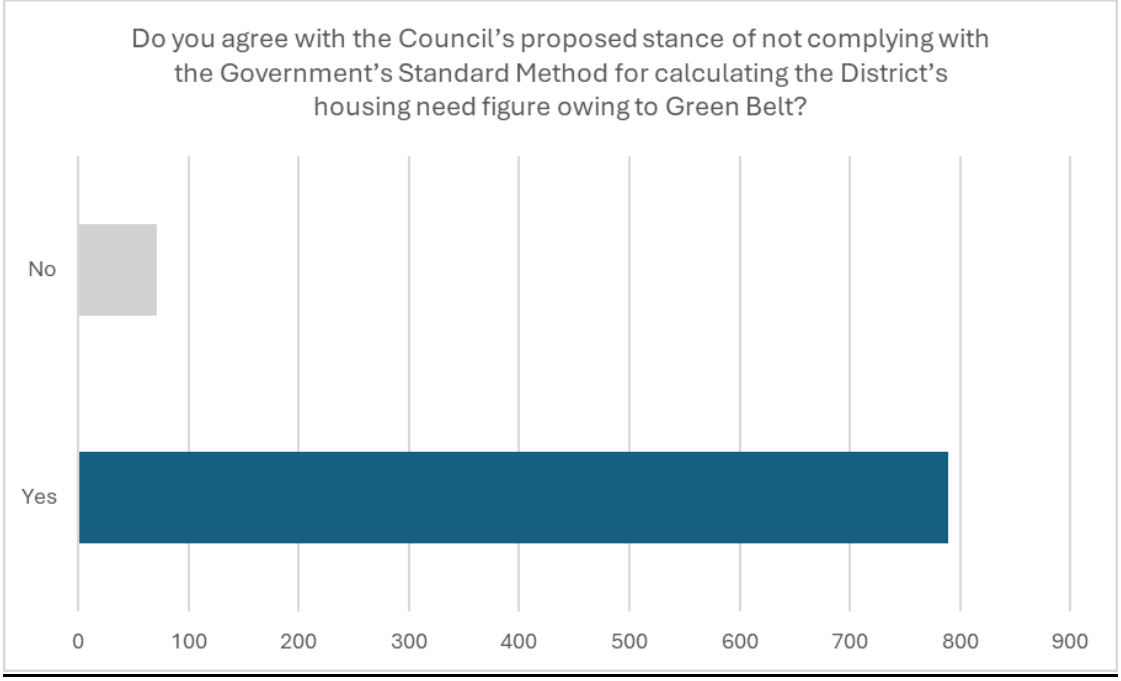

Figure 6. Summary of all public respondent's answers to Question 1

3.10 A similarly large majority of public respondents agreed that the Council's preferred 'Low Growth and Green Belt Restraint' option is the best growth strategy for the district (see Figure 7 below) In total, 767 respondents agreed with this approach whilst 82 did not.

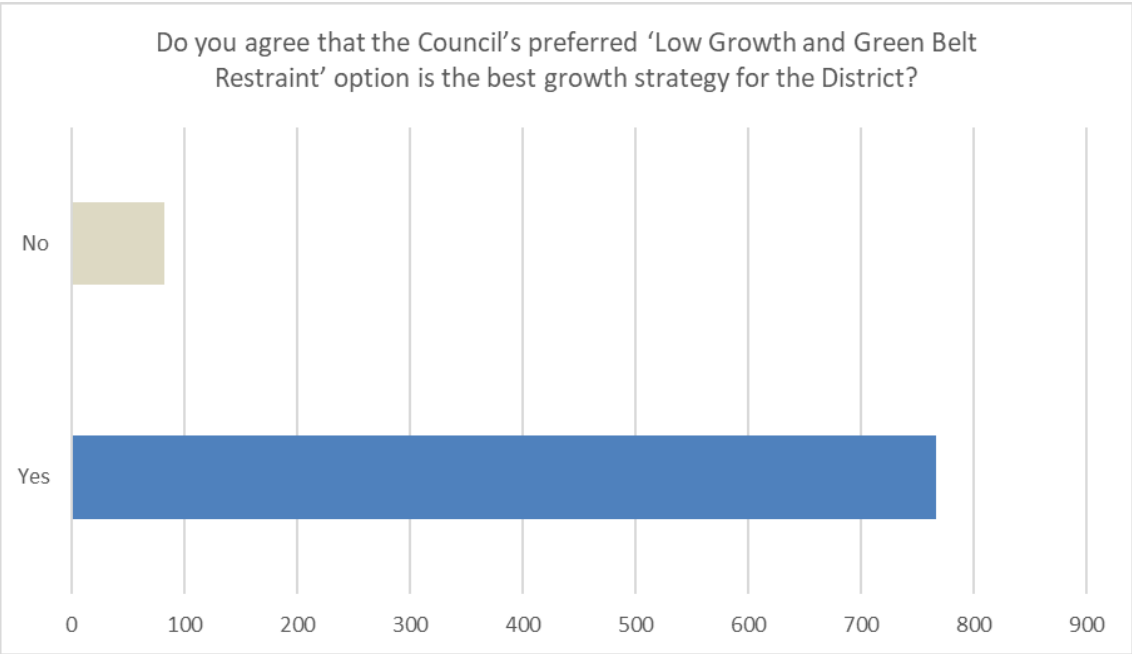

Figure 7. Summary of all public respondent's answers to Question 3.

3.11 <u>Key Themes Within Public Responses:</u>

3.11.1 A number of key themes were identified through the public responses to the consultation, as set out below.

3.11.2 **Green Belt**

The vast majority of public respondents were in favour of protecting the Green Belt to some degree. Whilst many acknowledged that some Green Belt release may be necessary, many respondents were against any form of Green Belt release.

Many indirect impacts of Green Belt release were mentioned including the loss of open space (and how this may impact on mental health), impact on wildlife, impact on character and loss of greenfield land.

3.11.3 **Infrastructure**

Many public respondents expressed concerns more generally about the inadequacy of existing infrastructure and the impact of new development on the existing infrastructure and services including putting a strain on doctors and schools. For the larger sites, some of these comments were more site specific. There were also questions as to whether infrastructure would be delivered as part of new developments.

3.11.4 **Transport**

Many respondents expressed concerns over access, parking and highway issues, traffic pollution and increased congestion arising from new development. Additionally, these comments were attributed to most sites during the site specific comments.

3.11.5 **Affordable Housing**

Many public respondents referenced the need to provide affordable housing and suggested that some of the sites be used for social housing, particularly garage sites.

3.11.6 **Flooding**

The risk of flooding, particularly surface water flooding was raised by many of the public respondents for many of the sites.

3.11.7 **Character**

The potential impact of development on the character of an area and the potential impact of development on heritage assets such as conservation areas and Listed Buildings were raised as concerns by many public respondents. Additionally, for many sites, the indicative dwelling capacity was referred to, often stating that the site was being over developed.

3.11.8 **Impact on Current/Future Occupiers**

The potential impact of development on existing residents was raised by respondents for sites that were located close to existing properties, including loss of light and

privacy concerns. Concerns were also raised for the future occupiers of development within sites located close to infrastructure such as the M25, railway lines or waste facilities, with air, light and noise being regularly referred to.

3.11.9 **Evidence Base/ Standard Method**

Many public respondents criticised the Standard Method stating that it used out of date population projections. Respondents identified the need for parts of the evidence base following the 2021 census, Brexit, the Covid pandemic and out of date studies such as the Local Housing Needs Assessment and the South-west Hertfordshire Employment Land Study.

3.12 The majority of sites received more “yes” responses to whether they are considered an appropriate development site than “no” responses. However, two sites received more “no” responses than “yes”, as seen below:

CG65 British Red Cross:

Public consultees: Yes: 212, No: 223

Main Concerns:

- Loss of a local community centre
- Impact on infrastructure (including schools and health facilities)

EOS7.0 Land to the south of Shepherds Lane and east of the M25:

Public consultees: Yes: 157, No: 163

Main Concerns:

- Road infrastructure, congestion and access from Shepherds Lane
- Loss of Green Belt
- Loss of public open green space
- Impact upon biodiversity and wildlife
- Proximity to the M25 impacting health and noise pollution
- Drainage infrastructure and potential of flooding

3.13 Additionally, numerous sites had a large percentage of “no” responses with regards to whether they were an appropriate development site. A summary of these sites can be seen below:

CFS4 Land At Warren Court

Public consultees: Yes: 156, No: 100

Main Concerns:

- School and Health infrastructure
- Road infrastructure and congestion
- Loss of Green belt
- Impact upon biodiversity and wildlife
- Proximity to protected trees

CFS3: Land adjacent to Fraser Crescent and Woodside Road

Public consultees: Yes: 133, No: 121

Main Concerns:

- Proximity to Grade II listed buildings
- Loss of Green Belt
- Impact upon biodiversity and wildlife
- Road infrastructure and congestion
- School infrastructure
- Damage to the rural character of the area

CFS6: Land at Mansion House Equestrian Centre

Public consultees: Yes: 129, No: 118

Main Concerns:

- Impact on wildlife and biodiversity with the area containing category 1 and 2 habitats
- Road infrastructure, access and congestion
- Loss of Green Belt
- Loss of equestrian centre

PCS21: Land at Love Lane

Public consultees: Yes: 132, No: 118

Main Concerns:

- Loss of Green Belt
- Impact upon biodiversity and wildlife
- Road infrastructure, access and congestion

- School and health infrastructure
- Potential loss of a public right of way

CFS65: Land north of Bucknalls Lane

Public consultees: Yes: 157, No: 105

Main Concerns:

- Road infrastructure, congestion and access through Bucknalls Lane
- Loss of Green Belt
- Impact upon biodiversity and wildlife
- Proximity to Recycling Centre
- School infrastructure
- Proximity to the motorway impacting health and noise pollution
- Presence of protected trees

CFS16: Land at Chorleywood Station

Public consultees: Yes: 231, No: 157

Main Concerns:

- Road infrastructure and access through Chorleywood Common
- Loss of parking for the station and the local area
- Rural character of the village
- Impact upon wildlife and biodiversity
- Presence of protected trees
- Impact on sewage infrastructure

CFS18c: Hill Farm, Stag Lane

Public consultees: Yes: 182, No: 157

Main Concerns:

- Road infrastructure, congestion and access from Stag Lane

- Proximity to amenities
- Loss of Green Belt
- Impact upon wildlife and biodiversity
- Potential loss of a Public right of way

EOS12.4: Land west and south of Maple Cross

Public consultees: Yes: 168, No 121

Main Concerns:

- Loss of Green Belt
- Impact upon wildlife and biodiversity
- Loss of public open green space
- School and health infrastructure
- Road infrastructure and congestion
- Proximity to the motorway impacting health and noise pollution

3.14 Appendix 1 – Sites Not Proposed for Development (Q's 5-6)

3.14.1 A large majority of public responses were in favour of the sites listed within Appendix 1 (not being proposed for development). Many found this approach to be sensible and proportional with protection of the Green Belt and its uses as the main contributing factor to this view. Other general concerns relating to these sites related to infrastructure, in particular road and school provision. Specific sites that were mentioned in relation to questions 5 and 6 included sites **CFS10**, **CFS56**, **ACFS9e** and **NSS6** in Bedmond and larger sites **CFS26c**, **CFS26e** and **NSS20** in Kings Langley. The main objections to these sites were harm to the Green Belt as well as their respective impact on the character of the local area. A minority of public respondents were not in favour of the sites listed within Appendix 1. The main reason for this concern was the need for housing in the district, particularly affordable housing.

3.14.2 Comparatively, a large majority of responses from promoters were not in favour of the sites listed in Appendix 1. Promoters generally specified their own sites in this reasoning. Criticism of the Green Belt review was common with multiple responses noting that harm to the Green Belt was judged with regard to the harm caused by releasing the entire parcel that a site is situated within, rather than assessing harm at a site-specific or more granular level. Other general criticism included the need for housing and services within the district.

3.14.3 Statutory consultees were largely in favour of the sites detailed in Appendix 1. Neighbouring authorities and local Parish Councils commented that the removal of these sites helps to prevent neighbouring urban areas from merging into one another

and protecting the Green Belt. Watford Borough Council and Watford Rural Parish Council both commended the removal of sites within Carpenders Park due to their impact on urban sprawl between Watford and Carpenders Park. It was generally noted that Three Rivers District Council provided a clear rationale as to why the excluded sites were not considered.

3.15 Comments on the Sustainability Appraisal Accompanying the Consultation

3.15.1 Responses from the public were largely negative with regards to the Sustainability Appraisal. Concerns were raised over the methodology of the appraisal in terms of the impacts on and provision of infrastructure. Many responses did not consider that full extent of impacts on road, water, services and parking had been taken into consideration. Specific sites mentioned in regard to these concerns included **EOS12.4 Land west and south of Maple Cross** and **CFS16 Land at Chorleywood Station**. Within the assessment summary it was noted that all options scored similarly in terms of their environmental impact with questions asked over the validity of this. A specific concern was raised in regard to site **CFS3 Land adjacent to Fraser Crescent and Woodside Road** of which is noted in the appraisal to be served by a regular bus route. Respondents stated that this bus route is no longer in operation. Further concerns were raised as to whether the justification of the lower growth housing option was compelling enough.

3.15.2 A small number of public respondents responded positively to the Sustainability Appraisal stating that it is useful, comprehensive and that the consideration of sustainability within any proposal is of great importance.

3.15.3 Similarly, responses from promoter consultees were largely negative in regard to the Sustainability Appraisal. General concerns were raised in relation to the vagueness and subjectivity of the appraisal. Many responses stated that it provided an inadequate assessment of the consequences of a lower growth option and its impacts upon health and wellbeing in comparison to higher growth options. Much like the public consultees some responses commented on the similarity in environmental impact for each of the options but questioned the Council's decision in following the lower growth option when housing impact was rated much more favourably in regard to the higher growth options.

3.15.4 Statutory consultees provided mixed responses regarding the Sustainability Appraisal. Many, including the Environment Agency, welcomed and were happy with its findings. Some concerns were raised in terms of its comprehensiveness. Watford Borough Council questioned if the appraisal had considered the cumulative impacts of development in the district as a whole. Other responses questioned specific sections of the appraisal with Historic England raising concerns related to the Heritage Assessment for many sites being assessed as '?' and therefore questioned if historic environment considerations had been meaningfully taken into account. Chalfont St Peter Parish Council specified site IOS12.4 as being wrongly assessed as sustainable while it does not have the required facilities nearby. Further concerns were raised in relation to building regulations and energy efficiency which is not detailed within the appraisal.

3.15.5 The responses relating specially to the Sustainability Appraisal were sent to TRL Limited, who issued the Sustainability Appraisal, to review further.

4.0 Potential Updates Following the Part 4 Regulation 18 Consultation

4.1 The planning policy team have collated all of the public, statutory consultee and landowner/promoter responses, with each individual response responded to by policy officers. The policy team will review the public, statutory consultee and landowner/promoter responses and our responses to these and use this information to update wording of policies, SHELAA forms, evidence documents and any other pieces of information relevant to the decision-making process.

4.2 Following the part 4 Regulation 18 consultation, the policy team are also in the process of undertaking meetings with promoters of the sites included within the part 4 Regulation 18 consultation document and including reviewing sites removed prior to the part 4 consultation.

4.3 A summary of some of the key potential updates following the part 4 Regulation 18 Consultation can be seen below:

- Following the reduction of the scale of site **EOS12.4 Land west and south of Maple Cross**, including a reduction of the indicative dwelling capacity to 850, further dwelling capacity reduction may be required to take into account infrastructure requirements on-site. Additionally, whilst the Transport Team at Hertfordshire County Council have advised that a bus strategy for the site will need to be developed and that the quantum of development proposed should enable some degree of service improvement, the developers have concerns that following the reduction in dwelling capacity, whether bus service improvements are viable.

- Following discussions with TFL's development company (Places For London), who raised viability concerns about providing like-for-like parking provision at the station sites, policy wording may need to be updated to request that "at a planning application stage a parking survey to establish the future level of parking on site taking into account rail traveller needs whilst opportunities for sustainable transport modes should be maximised and prioritised to allow for alternative forms of transport to the private car shall be submitted" rather than like-for-like parking provision being provided.

- HCC Transport raised significant concerns with relation to site **CFS65 Land North of Bucknalls Lane** with regards to how the proposed site-specific requirement for an access from the A405 can align with plan policy, and would be resisted by the highway authority on a range of policy and technical grounds. However, it must be noted that since these comments the developer has stated that they have had positive discussions with Herts County Council's transport team with regards to resolving the access concerns.

- With regards to site **CFS61 Cinnamond House,** the LLFA stated "*we do not think this site is appropriate for development unless it can pass the sequential test and suitable mitigation provided for the substantial surface water flood risk on site. This is likely to require a significant amount of attenuation which may reduce the quantum of housing*". The local authority and developer will have further discussions with the LLFA with regards to their concerns.

4.3 The following sites are no longer available for development (as a site allocation):

- **H18 Royal British Legion** (the site is still operational and the promoter has withdrawn interest)
- **P39 The Queens Drive Garages** (planning application permitted)

4.4 The following sites may now be added to the pool of appropriate development sites:

- **CFS72 Land off Solesbridge Lane**
- **CFS66 Land at London Road**
- **CFS10 Land Between Millhouse Lane and Bell Lane, Bedmond**

4.5 It is important to note that following further discussions with developers, further sites may be added (for example, if previous concerns such as access can be resolved) or removed (for example, due to recent planning consents) from the pool of potential sites and as such the overall housing figures are subject to change.

SC_P4_00001_National Gas		
General Comments		**General Comments – Officer Response**
	[Summary of comments. Full PDF available on request] National Gas Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Gas Transmission National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. Utilities Design Guidance The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure. National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around underground gas transmission pipelines and other National Gas Transmission assets. National Gas Transmission is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Gas Transmission assets. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Gas Transmission wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Gas Transmission on any Development Plan Document (DPD) or site-specific proposals that could affect National Gas Transmission's assets.	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as National Gas as part of its Duty to Co-operate.
SC_P4_00002_Historic England		
Q9 & 10 AB26: Do you agree that site AB26 is an appropriate development site? Please explain your answer.		**Officer Response AB26**
Neutral	[Summary of comments. Full PDF available on request] The is situated adjacent to the Abbots Langley Conservation Area and Grade II listed 'Breakspear College' (LEN 1296407). Our recommendation: We recommend stipulating in policy that a heritage impact assessment is required before determining any application for the site, as the effects are currently uncertain.	Comments noted. The LPA will discuss Historic England's request for a HIA to be submitted at a planning application stage with the developer.
Q17 & 18 H3: Do you agree that site H3 is an appropriate development site? Please explain your answer.		**Officer Response H3**
Neutral	[Summary of comments. Full PDF available on request] The site is situated within the Abbots Langley Conservation Area and is adjacent to several listed buildings, including the Grade I listed 'Church of St Lawrence the Martyr' (LEN 1296433), and the Grade II listed 'Abbot's House' (LEN 1296402), '23 (LEN 1100882), High Street' and '25, High Street' (LEN 1100883). While we acknowledge that the site is already allocated in the 2014 adopted Local Plan, it would benefit from a detailed heritage impact assessment to identify any necessary mitigation and enhancement measures. These findings could then be incorporated into the updated policy for the site.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.

	Our recommendation: We recommend conducting a Heritage Impact Assessment (HIA) prior to Regulation 19. This assessment would help identify any essential mitigation and enhancement measures, which can then be incorporated into the policy.	
Q23 & 24 NSS14: Do you agree that site NSS14 is an appropriate development site? Please explain your answer.		**Officer Response NSS14**
Neutral	[Summary of comments. Full PDF available on request] The site is located within the Abbots Langley Conservation Area, adjacent to several listed buildings, including the Grade I listed 'Church of St Lawrence the Martyr' (LEN 1296433) and Grade II listed 'The War Memorial about 40 metres east-north-east of Church of St Lawrence' (LEN 1173042). Considering the evident sensitivity of the site, it is surprising that it has not been assessed within the Council's High-Level Heritage Impact Assessment. Without this evidence, it is not possible to determine the suitability of the site for allocation and, if deemed suitable, to determine the number of dwellings it could accommodate while appropriately considering and responding to the historic environment. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.
Q27 & 28 CFS3: Do you agree that site CFS3 is an appropriate development site? Please explain your answer.		**Officer Response CFS3**
Neutral	[Summary of comments. Full PDF available on request] The site is located adjacent to the Grade II listed 'Garston Manor' (LEN 1173003) and 'Ice House about 70 metres northwest of Garston Manor' (LEN 1100917). We support the conclusions of the High-Level Heritage Impact Assessment, which recommends that a heritage impact assessment is necessary to identify the effects on the heritage assets associated with developing this allocation. We believe this assessment should be conducted in advance of Regulation 19 so that it can identify any necessary mitigation and enhancement measures, which might affect the capacity of the site. These findings could then be incorporated into the updated policy for the site. Our recommendation: Effects are uncertain. A Heritage Impact Assessment (HIA) should be conducted before Regulation 19 to confirm the site's suitability for allocation, assess its capacity, and identify any necessary mitigation measures (including appropriate measures on the eastern side of the area, as mentioned in the High Level Heritage Impact Assessment) and enhancement measures to be incorporated into the policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.
Q29 & 30 CFS6: Do you agree that site CFS6 is an appropriate development site? Please explain your answer.		**Officer Response CFS6**
Neutral	[Summary of comments. Full PDF available on request] The site is located adjacent to the Abbots Langley Conservation Area, and Grade II* 'Tithe Barn about 20 metres north east of Parsonage Farm' (LEN 1100908), and Grade II listed 'Mansion House Farmhouse' (LEN 1348213). We support the conclusions of the High-Level Heritage Impact Assessment, which recommends that a heritage impact assessment is necessary to identify the effects on the heritage assets associated with developing this allocation. We believe this assessment should be conducted in advance of Regulation 19 so that it can identify any necessary mitigation and enhancement measures, which might affect the capacity of the site. These findings could then be incorporated into the updated policy for the site.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer

	Our recommendation: Effects are uncertain. A Heritage Impact Assessment (HIA) should be conducted before Regulation 19 to confirm the site's suitability for allocation, assess its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into the policy.	
Q31 & 32 PCS21: Do you agree that site PCS21 is an appropriate development site? Please explain your answer.		**Officer Response PCS21**
Neutral	[Summary of comments. Full PDF available on request] In common with CFS6, the site is located adjacent to the Abbots Langley Conservation Area, and Grade II listed 'Mansion House Farmhouse' (LEN 1348213). We support the conclusions of the High-Level Heritage Impact Assessment, which recommends that a heritage impact assessment is necessary to identify the effects on the heritage assets associated with developing this allocation. We believe this assessment should be conducted in advance of Regulation 19 so that it can identify any necessary mitigation and enhancement measures, which might affect the capacity of the site. These findings could then be incorporated into the updated policy for the site. On this point the Council's Sustainability Appraisal concludes uncertain effects. Our recommendation: Effects are uncertain. A Heritage Impact Assessment (HIA) should be conducted before Regulation 19 to confirm the site's suitability for allocation, assess its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into the policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.
Q35 & 36 NSS2: Do you agree that site NSS2 is an appropriate development site? Please explain your answer.		**Officer Response NSS2**
Neutral	[Summary of comments. Full PDF available on request] The site is located immediately adjacent to the Grade II listed '56, High Street' (LEN 1100886) '52, High Street' (LEN 1348202), and '44, 46 And 48 (Poacher's Cottage), High Street' (LEN 1100885). Unfortunately, we have been unable to locate the assessment for this site within the High-Level Heritage Impact Assessment for Bedmond. Given the potential sensitivity of the site, we recommend undertaking a detailed heritage impact assessment now, ahead of Regulation 19, to confirm the suitability of the site, assess its extent and capacity, and establish any development criteria that may be needed to mitigate potential harm. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.
Q39& 40 NSS10: Do you agree that site NSS10 is an appropriate development site? Please explain your answer.		**Officer Response NSS10**
Neutral	[Summary of comments. Full PDF available on request] This site is situated to the south of the Hunton Bridge Conservation Area and several listed buildings, including the Grade II* 'The King's Lodge' (LEN 1100913) and the Grade II structures 'K6 telephone kiosk near junction of Bridge Road and Old Mill Road, Hunton Bridge' (LEN 1347866) and 'The King's Head Public House' (LEN 1348217). Unfortunately, we have been unable to locate the assessment for this site within the High-Level Heritage Impact Assessment for Kings Langley. Given the potential sensitivity of the site, we recommend undertaking a heritage impact assessment now, ahead of Regulation 19, to confirm the suitability of the site, assess its extent and capacity, and establish any development criteria that may be needed to mitigate potential harm. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer

	identify any necessary mitigation and enhancement measures to be incorporated into policy.	
Q41 & 42 ACFS8b: Do you agree that site ACFS8b is an appropriate development site? Please explain your answer.		**Officer Response ACFS8b**
Neutral	[Summary of comments. Full PDF available on request] The site is situated to the east of the 'Little London moated site and surrounding earthwork enclosures, King's Langley' Scheduled Monument (LEN 1010911). According to the Place Services 'High Level Heritage Impact Assessment, February 2022, "Any development of this site will require discussion with Historic England to identify the nature and extent of development that may be possible on the site. A Heritage Impact Assessment will be required." Given the potential sensitivity of the site, we recommend undertaking a detailed heritage impact assessment now, ahead of Regulation 19, to confirm the suitability of the site, assess its extent and capacity, and establish any development criteria that may be needed to mitigate potential harm. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.
Q43 & 44 H7: Do you agree that site H7 is an appropriate development site? Please explain your answer.		**Officer Response H7**
Neutral	[Summary of comments. Full PDF available on request] The site is situated adjacent to the Grade II listed 'Old Farm Cottages' (LEN 1296346), 'Stables To Langleybury House (Flats 7 To 10 Inclusive)' (LEN 1100889), 'Aisled Barn At Langleybury Home Farm About 45 Metres South West Of Langleybury House' (LEN 1348205), and the Grade II* 'Langleybury House & Film Centre' (LEN 1173157Considering the evident sensitivity of the site, it is surprising that it has not been assessed within the Council's High-Level Heritage Impact Assessment. While we acknowledge that the site is already allocated in the 2014 adopted Local Plan, it would benefit from a heritage impact assessment to identify any necessary mitigation and enhancement measures. These findings could then be incorporated into the updated policy for the site. Our recommendation: We recommend conducting a Heritage Impact Assessment (HIA) prior to Regulation 19. This assessment would help identify any essential mitigation and enhancement measures, which can then be incorporated into the policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer
Q45 & 46 CFS16: Do you agree that site CFS16 is an appropriate development site? Please explain your answer.		**Officer Response CFS16**
Neutral	[Summary of comments. Full PDF available on request] The site is located adjacent to the Chorleywood Common Conservation Area, and two Grade II listed buildings: '5,6 and 7, Chorleywood Bottom' (LEN 1100898) and 'K8 kiosk at Chorleywood Station' (LEN 1485091). The Place Services 'High Level Heritage Impact Assessment, February 2022,' concludes that, "Detailed discussion with the Conservation Officer at the pre-application stage to define the level of development that would be acceptable is essential. A heritage impact assessment will be required." The clear inference here is that necessary mitigation measures could affect the number of dwellings that can be accommodated sustainably on the site. On this basis, we strongly recommend that a detailed heritage impact assessment is undertaken now, ahead of Regulation 19, to confirm the site's suitability, assess its extent and capacity, and establish any development criteria that may be needed to mitigate potential harm. As drafted, the proposed dwelling capacity of 190 is not currently justified. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) must be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.

Q51 & 52 ACFS1: Do you agree that site ACFS1 is an appropriate development site? Please explain your answer.		**Officer Response ACFS1**
Neutral	[Summary of comments. Full PDF available on request] The site is located within the Chorleywood Common Conservation Area, and adjacent to a number of listed buildings, including the Grade II* 'Christchurch', and Grade II 'The Court with east and west lodges', 'K6 telephone kiosk outside Garden Gate public house', and 'Well House at the Manor House'. We support the conclusions of the High-Level Heritage Impact Assessment, which suggests that a detailed heritage impact assessment will be required looking at both the immediate heritage assets but also those further afield such as Applewood Farm. We believe this assessment should be conducted in advance of Regulation 19 so that it can identify any necessary mitigation and enhancement measures (including height of new build), which might affect the capacity of the site. These findings could then be incorporated into the updated policy for the site. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.
Q55 & 56 EOS12.4: Do you agree that site EOS12.4 is an appropriate development site? Please explain your answer.		**Officer Response EOS12.4**
Neutral	[Summary of comments. Full PDF available on request] Site EOS12.4 appears to correspond to High Level Heritage Impact Assessment sites CFS34 (Land South of Hornhill Road and Woodland Road) and CFS34A (Land South of Hornhill Road and Woodland Road, Maple Cross - Larger Site). The site is situated within the broader setting of the Grade II listed 'Church of St Thomas of Canterbury' (LEN 1173848), approximately 500 meters to the southeast. The Council's High-Level Heritage Impact Assessment notes that the Church is a prominent landmark in the area, with its tower visible from a considerable distance. Currently, the church is viewed within an open agrarian landscape, which will be impacted by the change from rural field to urban development. The assessment concludes that careful design has the potential to limit harm, especially on the eastern side of the development. Given the evident sensitivity of the site, we believe that a detailed heritage impact assessment should be conducted before Regulation 19. This assessment can identify any necessary mitigation and enhancement measures. These findings could then be seamlessly incorporated into the updated policy for the site Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's comments, including the request to submit a HIA prior to Regulation 19 Submission.
Q73 & 74 CFS59: Do you agree that site CFS59 is an appropriate development site? Please explain your answer.		**Officer Response CFS59**
Neutral	[Summary of comments. Full PDF available on request] The site is located adjacent to the Grade II* 'Moor Park' (LEN 1000251) Registered Park and Garden – an 18th-century landscape park and pleasure grounds laid out by Lancelot (Capability) Brown, circa 1753. The 'High-Level Heritage Impact Assessment,' February 2022, notes that the majority of the Registered Park and Garden (RPG), including the western edge closest to the proposed allocation, is used as a golf course. It goes on to state that no harm to these designated heritage assets is anticipated if the building heights/mass of any new development reference the existing character of London Road. We agree and request that these recommendations be incorporated into the site-specific policy for this site.	Comments noted. The LPA will discuss Historic England's comments, including incorporating the 'High-Level Heritage Impact Assessment' recommendations into site-specific policy wording/development criteria.

	Our recommendation: Incorporate the 'High-Level Heritage Impact Assessment' recommendations into site-specific policy wording/development criteria.	
Q75 & 76 CFS40a: Do you agree that site CFS40a is an appropriate development site? Please explain your answer.		**Officer Response CFS40a**
Neutral	[Summary of comments. Full PDF available on request] The site is located adjacent to the Rickmansworth Town Centre Conservation Area, and a number of listed buildings, including the Grade II listed ' St Joan of Arcs Convent High School' (LEN 1100848) and 'War Memorial Statue' (LEN 1348251) to the south of the railway line, and the Grade II listed 'Roman Catholic Church of Our Lady Help of Christians and St Augustine's Hall' (LEN 1430603). The Council's High-Level Heritage Impact Assessment notes that the Church (LEN 1430603) has direct views of the northern side of railway line and that any development in this area must take into account the setting of the church and its associated views. The assessment concludes that any application must be accompanied by a detailed heritage impact assessment. We agree that a detailed heritage impact assessment is required. However, we believe that it should be undertaken ahead of Regulation 19, so that it can inform necessary mitigation and enhancement measures to be incorporated into policy. Our recommendation: A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's comments, including the request to submit a HIA prior to Regulation 19 Submission.
Q79 & 80 H18: Do you agree that site H18 is an appropriate development site? Please explain your answer.		**Officer Response H18**
Neutral	[Summary of comments. Full PDF available on request] The site is located within the Rickmansworth Town Centre Conservation Area. Our recommendation: Our recommendation is to conduct a Heritage Impact Assessment (HIA) to identify and incorporate any necessary mitigation and enhancement measures into the policy if required.	Comments noted. The LPA will discuss Historic England's comments, including the request to submit a HIA prior to Regulation 19 Submission.
Q93 & 94 CFS61: Do you agree that site CFS61 is an appropriate development site? Please explain your answer.		**Officer Response CFS61**
Neutral	[Summary of comments. Full PDF available on request] The site is located adjacent to two Grade II listed buildings: 'Cassio Bridge Lock number 78' (LEN 1100841) and 'Cassio Bridge Lock House' (LEN 1348238). The Council's High-Level Heritage Impact Assessment concludes that these designated heritage assets will not be affected by the development of CFS61 since views from these assets are blocked by the railway embankment. However, it notes that the impact of development will depend on the proposed construction height. Based on this assessment, we recommend that a detailed heritage impact assessment be conducted now, ahead of Regulation 19 so that it can inform any necessary mitigation and enhancement measures to be incorporated into policy. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) ahead of Regulation 19 would be beneficial to identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's comments, including the request to submit a HIA prior to Regulation 19 Submission.
Q107 SA: Do you have any comments on the Sustainability Appraisal working note accompanying this consultation.		**Officer Response SA & General Comments**
	[Summary of comments. Full PDF available on request] In support of its proposed sites, the Council has published its 'Sustainability Appraisal Working Note' (October 2023) and 'High Level Heritage Impact Assessment' (February 2022), which we welcome. Appendix C of the SA Working Note provides assessments for each of the sites proposed for allocation in the Local Plan Part 4 Regulation 18	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as Historic England and Herts County Council as part of its Duty to Co-operate.

	consultation. These assessments include an objective for the historic environment. However, many of the sites included within the High-Level Heritage Impact Assessmentare assessed in the SA as '?' (i.e. uncertain effects) or as 'x' (negative effects) in terms of their impact on the historic environment. This raises uncertainty about how historic environment considerations (i.e. the conclusions of the HIA) have meaningfully influenced the overall site assessment and selection process. Indeed, the prevalence of '?' scores in the SA suggests that the understanding of the impacts on the historic environment for the Council proposed allocated sites may not be sufficient to justify their inclusion and capacity.	
General Comments		
	[Summary of comments. Full PDF available on request] Historic England strongly advises that the local authority conservation teams and archaeological advisors be closely involved throughout the preparation of the assessment of this Plan. They are best placed to advise on local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER - formerly Sites and Monuments Record); how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. Finally, we should like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment. Should you have any questions regarding the comments provided, please feel free to contact me. In the meantime, we look forward to continuing to work with you and your colleagues.	
SC_P4_00003_Transport For London		
Q45 & 46 CFS16: Do you agree that site CFS16 is an appropriate development site? Please explain your answer.		**Officer Response CFS16**
Neutral	[Summary of comments. Full PDF available on request] Thank you for consulting Transport for London (TfL) on the Regulation 18 Additional Lower Housing Growth Option. We note that CFS16 – Land at Chorleywood station and CFS20 – Land at Croxley station have been allocated as development sites. We do not wish to comment on these site allocations from a transport policy or operational perspective as they are being promoted by Places for London who will send a separate response representing TfL's interests in these sites as a landowner and developer.	Comments noted.
Q83 & 84 CFS20: Do you agree that site CFS20 is an appropriate development site? Please explain your answer.		**Officer Response CFS20**
Neutral	[Summary of comments. Full PDF available on request] Thank you for consulting Transport for London (TfL) on the Regulation 18 Additional Lower Housing Growth Option. We note that CFS16 – Land at Chorleywood station and CFS20 – Land at Croxley station have been allocated as development sites. We do not wish to comment on these site allocations from a transport policy or operational perspective as they are being promoted by Places for London who will send a separate response representing TfL's interests in these sites as a landowner and developer.	Comments noted.
SC_P4_00005_Affinity Water		
Q15 & 16 AB39: Do you agree that site AB39 is an appropriate development site? Please explain your answer.		**Officer Response AB39**
Neutral	[Summary of comments. Full PDF available on request]	Comments noted.

	When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	
Q21 & 22 H6: Do you agree that site H6 is an appropriate development site? Please explain your answer.		**Officer Response H6**
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed. For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites identified for new development with significant critical mains apparatus within their boundaries, where it will be essential that these are taken into consideration in the early stages of new developments.	Comments noted. During Discussions with the developer, the LPA will make the developer aware of Affinity Water's comments and the proximity of the site to Affinity Water apparatus.
Q25 & 26 CFS4: Do you agree that site CFS4 is an appropriate development site? Please explain your answer.		**Officer Response CFS4**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q27 & 28 CFS3: Do you agree that site CFS3 is an appropriate development site? Please explain your answer.		**Officer Response CFS3**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q29 & 30 CFS6: Do you agree that site CFS6 is an appropriate development site? Please explain your answer.		**Officer Response CFS6**
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed.	Comments noted. During Discussions with the developer, the LPA will make the developer aware of Affinity Water's comments and the proximity of the site to Affinity Water apparatus.

	For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites which have infrastructure in the vicinity of site boundaries, which development plans will need to take account of [Full comments in PDF] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	
Q31 & 32 PCS21: Do you agree that site PCS21 is an appropriate development site? Please explain your answer.		**Officer Response PCS21**
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed. For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites identified for new development with significant critical mains apparatus within their boundaries, where it will be essential that these are taken into consideration in the early stages of new developments. [Full comments in PDF] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted. During Discussions with the developer, the LPA will make the developer aware of Affinity Water's comments and the proximity of the site to Affinity Water apparatus.
Q33 & 34 CFS65: Do you agree that site CFS65 is an appropriate development site? Please explain your answer.		**Officer Response CFS65**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q35 & 36 NSS2: Do you agree that site NSS2 is an appropriate development site? Please explain your answer.		**Officer Response NSS2**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.

Q37 & 38 NSS6a: Do you agree that site NSS6a is an appropriate development site? Please explain your answer.		Officer Response NSS6a
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q39 & 40 NSS10: Do you agree that site NSS10 is an appropriate development site? Please explain your answer.		**Officer Response NSS10**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q41 & 42 ACFS8b: Do you agree that site ACFS8b is an appropriate development site? Please explain your answer.		**Officer Response ACFS8b**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q49 & 50 CFS18c: Do you agree that site CFS18c is an appropriate development site? Please explain your answer.		**Officer Response CFS18c**
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed. For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites identified for new development with significant critical mains apparatus within their boundaries, where it will be essential that these are taken into consideration in the early stages of new developments.	Comments noted. During Discussions with the developer, the LPA will make the developer aware of Affinity Water's comments and the proximity of the site to Affinity Water apparatus.
Q55 & 56 EOS12.4: Do you agree that site EOS12.4 is an appropriate development site? Please explain your answer.		**Officer Response EOS12.4**
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these	Comments noted. The LPA will discuss Affinity Water's comments with the developer.

	individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed. For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites identified for new development with significant critical mains apparatus within their boundaries, where it will be essential that these are taken into consideration in the early stages of new developments. When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	
Q57 & 58 MC11: Do you agree that site MC11 is an appropriate development site? Please explain your answer.		**Officer Response MC11**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration. [Full comments in PDF] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q58 & 60 EOS 7.0: Do you agree that site EOS7.0 is an appropriate development site? Please explain your answer.		**Officer Response EOS7.0**
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed. For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites identified for new development with significant critical mains apparatus within their boundaries, where it will be essential that these are taken into consideration in the early stages of new developments. When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted. The LPA will discuss Affinity Water's comments with the developer.

Q61 & 62 P4a: Do you agree that site P4a is an appropriate development site? Please explain your answer.		Officer Response P4a
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q63 & 64 P33: Do you agree that site P33 is an appropriate development site? Please explain your answer.		**Officer Response P33**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q65 & 66 P38: Do you agree that site P38 is an appropriate development site? Please explain your answer.		**Officer Response P38**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q67 & 68 P39: Do you agree that site P39 is an appropriate development site? Please explain your answer.		**Officer Response P39**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q69 & 70 RW31: Do you agree that site RW31 is an appropriate development site? Please explain your answer.		**Officer Response RW31**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q71 & 72 H15: Do you agree that site H16 is an appropriate development site? Please explain your answer.		**Officer Response H15**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q73 & 74 CFS59: Do you agree that site CFS59 is an appropriate development site? Please explain your answer.		**Officer Response CFS59**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.

Q75& 76 CFS40a: Do you agree that site CFS40a is an appropriate development site? Please explain your answer.		Officer Response CFS40a
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q79 & 80 H18: Do you agree that site H18 is an appropriate development site? Please explain your answer.		**Officer Response H18**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q81 & 82 H22a: Do you agree that site H22a is an appropriate development site? Please explain your answer.		**Officer Response H22a**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q87 & 88 CG47: Do you agree that site CG47 is an appropriate development site. Please explain your answer.		**Officer Response CG47**
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed. For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites identified for new development with significant critical mains apparatus within their boundaries, where it will be essential that these are taken into consideration in the early stages of new developments.	Comments noted. The LPA will discuss Affinity Water's comments with the developer, including potential proximity of the site to apparatus.
Q95 & 96 CFS12: Do you agree that site CFS12 is an appropriate development site. Please explain your answer.		**Officer Response CFS12**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments Noted.
Q103 & 104 PCS16: Do you agree that site PCS16 is an appropriate development site. Please explain your answer.		**Officer Response PCS16**

Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q105 & 106 H24: do you agree that site H24 is an appropriate development site. Please explain your answer.		**Officer Response H24**
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
General Comments		**Officer Response General Comments**
	[Summary of comments. Full PDF available on request] We welcome the opportunity to engage with planning authorities on plan and policy document development. In addition, we welcome the opportunity to engage as early as is practicable with the planning application process.	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as Affinity Water as part of its Duty to Co-operate.
SC_P4_00006_National Grid		
General Comments		**Officer Response General Comments**
	[Full PDF available on request]	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as National Grid as part of its Duty to Co-operate.
SC_P4_00012_Dacorum Borough Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Neutral	[Summary of comments. Full PDF available on request] Note it is important that any such approach is fully justified in light of the most up to date national policy and guidance. This should include a robust review of how constraints have been taken into account alongside other material considerations.	Comments noted. The standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints, including Green Belt, drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		**Officer Response Low Growth Option**
Neutral	[Summary of comments. Full PDF available on request] We note it is important that any such approach is fully justified in light of the most up to date national policy and guidance. This should	Comments noted. The standard method figures should be taken forwards as providing an appropriate

	include a robust review of how constraints have been taken into account alongside other material considerations. Through the Duty to Cooperate, it is important that growth in Kings Langley and the wider area is considered holistically across administrative boundaries and that the necessary infrastructure is planned for appropriately. We welcome continuing the discussions with you on matters of strategic importance such as housing, employment and related topics. I would suggest that we seek to arrange further meetings to discuss cross-boundary issues and progress with our respective plan-making.	assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints, including Green Belt, drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target. Three Rivers will continue undertaking Duty to Cooperate meetings with Dacorum Borough Council and other relevant authorities.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		**Officer Response Sites not taken forward**
Neutral	[Summary of comments. Full PDF available on request] We broadly welcome the suggested changes to the strategy for growth at Kings Langley. In particular we welcome confirmation that sites CFS26c, NSS20 and CFS26e are recommended to be deleted.	Comments noted.
General Comments		**Officer Response General Comments**
	[Summary of comments. Full PDF available on request] Through the Duty to Cooperate, it is important that growth in Kings Langley and the wider area is considered holistically across administrative boundaries and that the necessary infrastructure is planned for appropriately. I hope that you find the above response constructive in taking forward your emerging Local Plan. We welcome continuing the discussions with you on matters of strategic importance such as housing, employment and related topics. I would suggest that we seek to arrange further meetings to discuss cross-boundary issues and progress with our respective plan-making.	Comments noted. The LPA will continue to undertake discussions with neighbouring Local Authorities such as Dacorum Borough Council as part of its Duty to Co-operate.
SC_P4_00014_Thames Water		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Neutral	[Full PDF available on request] No relevant comments.	Comments noted.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		**Officer Response Low Growth Option**
Neutral	[Summary of comments. Full PDF available on request] Overall the reduced levels of development would have a lesser impact on the sewerage network and capacity at our sewage treatment works although localised network upgrades are likely to be required and will need to be delivered ahead of the occupation of development. We are keen to work closely with the council to understand the level of development that will come forward in the district through the new Local Plan so that this information can be used to inform future growth plans.	Comments noted. The Council will review the site specific comments from Thames Water and liaise with site promoters with regards to Thames Waters' comments or requested actions. The Council will continue to liaise with Thames Water.
Q7 & 8 AB18: Do you agree that site AB18 is an appropriate development site? Please explain your answer.		**Officer Response AB18**

Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q11 & 12 AB31: Do you agree that site AB31 is an appropriate development site? Please explain your answer.		**Officer Response AB31**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q13 & 14 AB32: Do you agree that the site AB32 is an appropriate development site? Please explain your answer.		**Officer Response AB32**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q15 & 16 AB39: Do you agree that the site AB39 is an appropriate development site? Please explain your answer.		**Officer Response AB39**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q17 & 18: Do you agree that the site H3 is an appropriate development site? Please explain your answer.		**Officer Response H3**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q19 & 20: Do you agree that the site H4 is an appropriate development site? Please explain your answer.		**Officer Response H4**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q21 & 22: Do you agree that the site H6 is an appropriate development site? Please explain your answer.		**Officer Response H6**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q23 & 24: Do you agree that the site NSS14 is an appropriate development site? Please explain your answer.		**Officer Response NSS14**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q25 & 26: Do you agree that the site CFS4 is an appropriate development site? Please explain your answer.		**Officer Response CFS4**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q27 & 28: Do you agree that the site CFS3 is an appropriate development site? Please explain your answer.		**Officer Response CFS3**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q29 & 30: Do you agree that the site CFS6 is an appropriate development site? Please explain your answer.		**Officer Response CFS6**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q31 & 32: Do you agree that the site PCS21 is an appropriate development site? Please explain your answer.		**Officer Response PCS21**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q33 & 34: Do you agree that the site CFS65 is an appropriate development site? Please explain your answer.		**Officer Response CFS65**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed	Comments noted. The LPA will discuss phasing with the applicant and make them aware of

	development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	consultee comments during discussions.
Q35 & 36: Do you agree that the site NSS2 is an appropriate development site? Please explain your answer.		**Officer Response NSS2**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q37 & 38: Do you agree that the site NSS6a is an appropriate development site? Please explain your answer.		**Officer Response NSS6a**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q39 & 40: Do you agree that the site NSS10 is an appropriate development site? Please explain your answer.		**Officer Response NSS10**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q41 & 42: Do you agree that the site ACFS8b is an appropriate development site? Please explain your answer.		**Officer Response ACFS8b**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.

Q43 & 44: Do you agree that the site H7 is an appropriate development site? Please explain your answer.		Officer Response H7
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q45 & 46: Do you agree that the site CFS16 is an appropriate development site? Please explain your answer.		**Officer Response CFS16**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q47 & 48: Do you agree that the site CW9 is an appropriate development site? Please explain your answer.		**Officer Response CW9**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q49 & 50: Do you agree that the site CFS18c is an appropriate development site? Please explain your answer.		**Officer Response CFS18c**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q51 & 52: Do you agree that the site ACFS1 is an appropriate development site? Please explain your answer.		**Officer Response ACFS1**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q53 & 54: Do you agree that the site NSS23 is an appropriate development site? Please explain your answer.		**Officer Response NSS23**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q55 & 56: Do you agree that the site EOS12.4 is an appropriate development site? Please explain your answer.		**Officer Response EOS12.4**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q57 & 58: Do you agree that the site NSS23 is an appropriate development site? Please explain your answer.		**Officer Response NSS23**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q59 & 60: Do you agree that the site EOS7.0 is an appropriate development site? Please explain your answer.		**Officer Response EOS7.0**
	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q61 & 62: Do you agree that the site P4a is an appropriate development site? Please explain your answer.		**Officer Response P4a**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q63 & 64: Do you agree that the site P33 is an appropriate development site? Please explain your answer.		**Officer Response P33**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q65 & 66: Do you agree that the site P38 is an appropriate development site? Please explain your answer.		**Officer Response P38**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q67 & 68: Do you agree that the site P39 is an appropriate development site? Please explain your answer.		**Officer Response P39**

Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q69 & 70: Do you agree that the site RW31 is an appropriate development site? Please explain your answer.		**Officer Response RW31**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q71 & 72: Do you agree that the site H15 is an appropriate development site? Please explain your answer.		**Officer Response H15**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer	Comments noted.

	network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q73 & 74: Do you agree that the site CFS59 is an appropriate development site? Please explain your answer.		**Officer Response CFS59**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q75 & 76: Do you agree that the site CFS40a is an appropriate development site? Please explain your answer.		**Officer Response CFS40a**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q77 & 78: Do you agree that the site H17 is an appropriate development site? Please explain your answer.		**Officer Response H17**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q79 & 80: Do you agree that the site H18 is an appropriate development site? Please explain your answer.		**Officer Response H18**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q81 & 82: Do you agree that the site H22a is an appropriate development site? Please explain your answer.		**Officer Response H22a**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q83 & 84: Do you agree that the site CFS20 is an appropriate development site? Please explain your answer.		**Officer Response CFS20**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q85 & 86: Do you agree that the site CG16 is an appropriate development site? Please explain your answer.		**Officer Response CG16**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q87 & 88: Do you agree that the site CG47 is an appropriate development site? Please explain your answer.		**Officer Response CG47**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q89 & 90: Do you agree that the site CG65 is an appropriate development site? Please explain your answer.		**Officer Response CG65**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q91 & 92: Do you agree that the site H9 is an appropriate development site? Please explain your answer.		**Officer Response H9**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q93 & 94: Do you agree that the site CFS61 is an appropriate development site? Please explain your answer.		**Officer Response CFS61**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q95 & 96: Do you agree that the site CFS12 is an appropriate development site? Please explain your answer.		**Officer Response CFS12**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q97 & 98: Do you agree that the site AS13 is an appropriate development site? Please explain your answer.		**Officer Response AS13**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q99 & 100: Do you agree that the site AS31 is an appropriate development site? Please explain your answer.		**Officer Response AS31**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.

Q101 & 102: Do you agree that the site BR20 is an appropriate development site? Please explain your answer.		Officer Response BR20
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q103 & 104: Do you agree that the site PCS16 is an appropriate development site? Please explain your answer.		**Officer Response PCS16**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q105 & 106: Do you agree that the site H24 is an appropriate development site? Please explain your answer.		**Officer Response H24**
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
General Comments		**Officer Response General Comments**
	[Summary of comments. Full PDF available on request] Overall the reduced levels of development would have a lesser impact on the sewerage network and capacity at our sewage treatment works although localised network upgrades are likely to be required and will need to be delivered ahead of the occupation of development. We are keen to work closely with the council to understand the level of development that will come forward in the district through the new Local Plan so that this information can be used to inform future growth plans.	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as Thames Water as part of its Duty to Co-operate.
SC_P4_00018_HWE Integrated Care Board		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Neutral	[Summary of comments. Full PDF available on request] The Three Rivers Regulation 18 Part 4 consultation proposes a reduced housing target of 4,852 homes, which is a substantially reduced figure from the Government's target of 11,466 new homes. It is noted that the 11,466 target uses the Government's current standard method for calculating local housing need, however the position of Three Rivers District Council is the Government's standard method is too high and based on 2014 household projections. Whilst the Government intends to review the approach for calculating local housing needs, following the release of the next household projections data based on the 2021 Census, the timetable for this is unknown. As a health infrastructure provider, any delay in reaching an adopted Local Plan and/or subsequentchanges to the proposed housing targets, will have an impact on the NHS' long term health planningand pipeline projects. In some cases, there may be circumstances where previously identified health infrastructure projects no longer spatially meet the new distribution of housing growth, and/or the quantum of need. Similarly, NHS priorities may have also changed. Given the draft Local Plan is being taken forward 'at risk', the potential uncertainty over whether the draft Local Plan meets the test of legal soundness is of concern to the NHS HWE ICB given the HWE ICB and system partners have assessed long-term health plans in the context of higher growth and now in the context of lower housing targets.	Comments noted. With regards to the use of the standard method figure, it is considered that the standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target. It is acknowledged that uncertainty or delays with the adoption of the Local Plan could cause implications for HWE ICB as the health infrastructure provider.

Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Neutral	[Summary of comments. Full PDF available on request] In relation to the proposed lower growth strategy, and in the light of the NHS' ambition to deliver joined-up care for people who rely on multiple different services, growth located within more accessible locations will offer a number of sustainable modes of travel to access NHS services for patients, visitors and staff alike. It is however disappointing that identified sites have largely shifted away from the most sustainable locations within the district to small and larger sites in settlements lower down the settlement hierarchy. The HWE ICB is supportive of a growth strategy which identifies and prioritises development sites on previously developed land first which can provide access to a greater range of services and facilities. Development on brownfield sites, particularly within accessible locations can also bring forward higher densities. These more connected sites, with sustainable active travel choices, are likely to be healthier to live in and can contribute to climate targets. Further, within more connected settlements, there may be opportunities for the NHS to explore repurposing NHS buildings. The majority of brownfield sites identified within the draft Plan are small, with the lowest identified being 6 dwellings. The cumulative impact of these small sites on existing NHS services is of concern to the NHS due to the difficulties for the NHS to mitigate these impacts and successfully secure developer contributions from individual developments. The HWE ICB and system partners therefore seek assurances that the Council will support heath developer contributions sought from the NHS to mitigate the health impacts arising from the cumulative impact of small site allocations and would welcome discussions with the Council on the role of CIL in securing necessary funding.	Comments noted. As set out in the Regulation 18 consultation document, the Council "will seek to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land." An Urban Capacity Study has been undertaken to identify available and suitable sites. Additionally, with regards to the Green Belt, our approach is avoid sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review. It is acknowledged that this approach has reduced the number of potential sites compared to previous Regulation 18 Consultations, particulalry larger sites, as well as reducing the scale of the retained strategic sites. The LPA will continue to undertake discussions with relevant bodies such as HWE ICB as part of the Duty to Co-operate.
Q27 & 28: Do you agree that the site CFS3 is an appropriate development site? Please explain your answer.		**Officer Response CFS3**
Neutral	[Summary of comments. Full PDF available on request] This site allocation will have a significant impact on GP practices in Abbots Langley. Vine House Surgery is currently working on a long-term premises plan to enable them to maintain continuity of services for their existing patient population as well as future growth. The HWE ICB will seek a financial contribution as previously explained under the section 'Recent investments and Planned Primary Care Infrastructure'.	Comments noted. During discussions with the developer, the LPA will discuss HWE's comments regarding financial contributions.
Q29 & 30: Do you agree that the site CFS6 is an appropriate development site? Please explain your answer.		**Officer Response CFS6**
Neutral	[Summary of comments. Full PDF available on request] This site allocation will have a significant impact on GP practices in Abbots Langley. Vine House Surgery is currently working on a long-term premises plan to enable them to maintain continuity of services for their existing patient population as well as future growth. The HWE ICB will seek a financial contribution as previously explained under the section 'Recent investments and Planned Primary Care Infrastructure'.	Comments noted. During discussions with the developer, the LPA will discuss HWE's comments regarding financial contributions.
Q33 & 34: Do you agree that the site CFS65 is an appropriate development site? Please explain your answer.		**Officer Response CFS65**
Neutral	[Summary of comments. Full PDF available on request] This site allocation is located close to Watford and will mainly impact on GP practices outside the Three Rivers, predominantly in the Garston area. One of the two practices, Garston Medical Centre is operating in very constrained conditions. A project has been approved for the extension and refurbishment of the practice, however, due to the viability issues, this project is currently on hold. The HWE ICB would therefore apply for developer contributions on any new development that would impact on this surgery.	Comments Noted. The LPA will discuss potential financial contributions with the developer.

Q45 & 46: Do you agree that the site CFS16 is an appropriate development site? Please explain your answer.		Officer Response CFS16
Neutral	[Summary of comments. Full PDF available on request] This site allocation will have a significant impact on the GP practices in Chorleywood. Given that one of the surgeries is a branch of the Gade House practice in Rickmansworth which, as explained above, is currently working on their long-term premises plan, the HWE ICB will be seeking a financial contribution towards this project as previously explained under the section 'Recent investments and Planned Primary Care Infrastructure"	Comments noted. During discussions with the developer, the LPA will discuss HWE's comments regarding financial contributions.
Q55 & 56: Do you agree that the site EOS12.4 is an appropriate development site? Please explain your answer.		**Officer Response EOS12.4**
Neutral	[Summary of comments. Full PDF available on request] An assessment of existing primary care capacity within the PCNs affected, as covered later in this response, shows all PCNs are constrained and their ability to accept new patients is limited, even taking into consideration current GP pipeline projects. This assessment shows there will be a need for new medical facilities which could only be accommodated within sites Maple Cross EOS12.4 and Mill End - EOS7.0. The HWE ICB therefore requests that health infrastructure is provided, in the form of on-site provision for a new medical centre. Without on-site health provision, this major development will have a significant impact on the two GP practices in Rickmansworth. Given that one of the practices, Gade House Surgery is currently working on a long-term premises plan, the HWE ICB would like to reserve an option for an on-site facility for EOS12.4 Maple Cross. This may take a form of a branch surgery or a relocation to provide for their existing patient population as well as future growth.	Comments noted. The LPA will discuss HWE's comments with the developer, including the request for on-site provision of a medical facility to be provided.
Q59 & 60: Do you agree that the site EOS7.0 is an appropriate development site? Please explain your answer.		**Officer Response EOS7.0**
Neutral	[Summary of comments. Full PDF available on request] An assessment of existing primary care capacity within the PCNs affected, as covered later in this response, shows all PCNs are constrained and their ability to accept new patients is limited, even taking into consideration current GP pipeline projects. This assessment shows there will be a need for new medical facilities which could only be accommodated within sites Maple Cross EOS12.4 and Mill End - EOS7.0. The HWE ICB therefore requests that health infrastructure is provided, in the form of on-site provision for a new medical centre for the following preferred sites:	Comments noted. The LPA will discuss HWE's comments with the developer, including the request for on-site provision of a medical facility to be provided.
Q75 & 76: Do you agree that the site CFS40a is an appropriate development site? Please explain your answer.		**Officer Response CFS40a**
Neutral	[Summary of comments. Full PDF available on request] This site allocation will have an impact on the GP practices in Rickmansworth. Similar to CFS16 above, the HWE ICB will be seeking a financial contribution towards the Gade House Surgery project.	Comments Noted. The LPA will discuss HWE's comments with the developer regarding financial contributions
Q83 & 84: Do you agree that the site CFS20 is an appropriate development site? Please explain your answer.		**Officer Response CFS20**
Neutral	[Summary of comments. Full PDF available on request] This major development will have a significant impact on GP practices in Croxley Green, especially the New Road Surgery. As explained above, and dependent on the appeal decision, there is currently a proposal for a new branch surgery in Sarratt, which would alleviate pressures on their main surgery in Croxley Green. Notwithstanding this, there is still a need to relocate the practices' main surgery from a cramped converted residential building to a purpose-built premises. As such the HWE ICB would seek a financial contribution towards a new premises solution for the New Road Surgery.	Comments noted. The LPA will discuss HWE's comments with the developer including the potential need for financial contributions.

Q93 & 94: Do you agree that the site CFS61 is an appropriate development site? Please explain your answer.		Officer Response CFS61
Neutral	[Summary of comments. Full PDF available on request] This site allocation is expected to impact on the Bridgewater House Surgery and the two practices in Croxley Green. For this reason, HWE ICB would be seeking a financial contribution towards a new premises solution for the New Road Practice as previously explained under the section 'Recent investments and Planned Primary Care Infrastructure'.	Comments noted. The LPA will discuss HWE's comments with the developer including the potential need for financial contributions.
General Comments		**Officer Response General Comments**
	[Summary of comments. Full PDF available on request] Given the role of the Local Plan and its policies to facilitate improvements to health infrastructure and provide a mechanism to improve people's health, the draft Regulation 19 should make reference to this joint, collaborative work and the above-mentioned strategic priorities. The HWE ICB would welcome engagement with the next iteration of the Infrastructure Delivery Plan (IDP), to ensure that the HWE ICB's strategic infrastructure priorities are integrated into the drafting of health infrastructure requirements to support c4,852 new homes. The Local Plan and IDP will need to address the cumulative impact of the smaller developments proposed in the draft Plan, as well as cross-boundary infrastructure and funding sources. It is noted this consultation focusses on housing growth and associated infrastructure and does not include the draft policies of the Plan. The Local Plan Sub-Committee Meetings and Reports referenced in the consultation document have not been reviewed in full against representations made by the NHS at previous Regulation 18 consultation stages. The HWE ICB will await the Regulation 19 consultation and will fully review the draft policies then.	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as Thames Water as part of its Duty to Co-operate. Infrastructure requirements will be identified in the Infrastructure Delivery Plan. It is noted that the HWE ICB will provide policy specific comments as part of the Regulation 19 Consultation.
SC_P4_00019_Watford Borough Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Neutral	[Summary of comments. Full PDF available on request] Watford Borough Council adopted its Local Plan in 2022 with an annual housing requirement of 784 dwellings. It is recognised that Three Rivers is different in character to Watford in terms of the challenges and opportunities facing future development in our respective areas. However, we wish to highlight the importance of demonstrating the exceptional circumstances that are required to justify not achieving a higher level of housing delivery across the plan period. Watford shares its Housing Market Area with Three Rivers, in conjunction with the other South West Hertfordshire authorities of Dacorum, Hertsmere and St Albans. Therefore, the implications the proposed housing figures, as set out in the consultation document, may have for neighbouring districts such as Watford will need to be determined. Watford has a very challenging housing requirement, including a windfall allowance of 148 dwellings per year from 2024/25, compared to the figure of 22 dwellings per year across the plan period as proposed. Watford Borough Council would like to clarify that the borough does not have capacity to meet additional unmet housing need from Three Rivers. During the Examination of the Watford Local Plan, several cross-boundary issues were discussed. These include the provision of education facilities and industrial land, neither of which can be met within Watford's administrative boundaries. The consultation is	Comments noted. It is also considered that the character of Watford Borough Council and Three Rivers District Council are different, including the challenges and opportunities facing future development in our respective areas. It is considered that the standard method figure should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target. As part of ongoing meetings with neighbouring Local Authorities, there will be discussions regarding possible

	focussed on housing sites, however, we would seek reassurance that the revised housing figure and proposed sites do not compromise future discussions and provision of these facilities where opportunities may exist.	implications of the proposed housing figure Comments noted with regards to Watford Borough Council not being able to meet unmet need from Three Rivers District Council The draft local plan is considering the provision of education facilities and industrial land and discussions are ongoing with relevant consultees and stakeholders
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		**Officer Response Low Growth Option**
Neutral	[Summary of comments. Full PDF available on request] Watford Borough Council supports the brownfield first approach set out. However, with the scale of growth proposed, consideration should be given to how this may affect growth pressure within existing built up areas where these are considered to be sustainable locations over the plan period. More specifically, how the Sustainability Appraisal has considered if the reduced housing figures would result in greater intensification of built up areas and the implications of this in the context of the cumulative impacts of development and the application of the Local Plan, and the policies within, as a whole.	Comments noted. The Regulation 18 consultation document states that the Council "will seek to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land." An Urban Capacity Study has been undertaken to identify available and suitable sites. With regards to potential intensifictaion of built up areas as a result of the low growth approach, this will be taken into consideration during the Local Plan Process.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		**Officer Response Sites not taken forward**
Yes	[Summary of comments. Full PDF available on request] Watford Borough Council agrees with the removal of sites CFS13 and CFS14 as development of this land, either individually or collectively, would compromise the separation of Watford (Watford Heath area) and Carpenders Park. This is one of the defined functions of Green Belt defined in the National Planning Policy Framework and concerns have been raised through earlier consultations on the Three Rivers Local Plan.	Comments noted.
Q21 & 22: Do you agree that the site H6 is an appropriate development site?		**Officer Response H6**
Neutral	[Summary of comments. Full PDF available on request] The site is close to Watford's administrative boundary, however, Watford Borough Council have no concerns to raise in the context of residential development given the location of the site. There is however a significant shortfall of industrial land in Watford with only 25% of its need being met through adopted site allocations. Despite the small size of the site (0.13 hectares), the loss of industrial land will not make a positive contribution to resolving the issue. The Council would welcome opportunities for Three Rivers to support Watford through the protection and allocation of land for industrial use where this would benefit the borough and South West Herts more broadly.	Comments noted. Three Rivers will continue to liaise with neighbouring local authorities such as Watford Borough Council on cross-boundary issues, for example via Duty to Cooperate meetings.
Q25 & 26: Do you agree that the site CFS4 is an appropriate development site?		**Officer Response CFS4**
Neutral	[Summary of comments. Full PDF available on request] The site is located approximately 300m from Watford administrative boundary. It is not used for allotments at present, however, proposed growth in the area may generate a need for allotments.	Comments noted. Three Rivers will continue to liaise with neighbouring local authorities such as Watford Borough Council on cross-boundary

	Watford borough Council is currently undertaking a needs assessment of allotment provision in the borough. Should there be an identified shortfall in north Watford which would reside within the catchment of the site, we would welcome dialogue about this site and if there is an opportunity the meet shared objectives.	issues, for example via Duty to Cooperate meetings.
Q93 & 94: Do you agree that the site CFS61 is an appropriate development site?		**Officer Response CFS61**
Neutral	[Summary of comments. Full PDF available on request] The Council would draw attention to the Watford to Croxley Link (W2CL) which is an important transport corridor being progressed between Watford and Ascot Road just south of this site. While this will improve connectivity for residents of the site when delivered, the Council would like Three Rivers to consider if there are implications for site CFS61 and delivery of W2CL. In addition, adopted site allocation MU18 in the Watford Local Plan, located south east of the site, includes development considerations that will safeguard an appropriate amount of land to support a mass rapid transport interchange/station which, once delivered, will improve the sustainability of the location.	Comments noted. With regards to potential further works to the Metropolitan line, representations from TFl and Herts County Council will be taken into consideration.
Q107 SA: Do you have any comments on the Sustainability Appraisal working note accompanying this consultation.		**Officer Response SA & General Comments**
	[Summary of comments. Full PDF available on request] Watford Borough Council supports the brownfield first approach set out. However, with the scale of growth proposed, consideration should be given to how this may affect growth pressure within existing built up areas where these are considered to be sustainable locations over the plan period. More specifically, how the Sustainability Appraisal has considered if the reduced housing figures would result in greater intensification of built up areas and the implications of this in the context of the cumulative impacts of development and the application of the Local Plan, and the policies within, as a whole.	Comments noted. The LPA will continue to undertake discussions with neighbouring Local Authorities such as Watford Borough Council as part of its Duty to Co-operate.
General Comments		
	[Summary of comments. Full PDF available on request] WBC have been working constructively with TRDC on the development of the Local Plan and will continue to do so. WBC also welcomes continued collaboration between the authorities in South West Hertfordshire on the South West Hertfordshire Joint Strategic Plan which intends to set out a long-term strategy for growth in the sub-region. Should you have any queries regarding these comments please do not hesitate to contact the Watford Borough Council Planning Policy team. This response will not prejudice any future comments the Council may wish to submit at a later date on the Three Rivers Local Plan.	
SC_P4_00020_Chorleywood Parish Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Yes	[Summary of comments. Full PDF available on request] Chorleywood Parish Council supports the level of housing proposed as it balances the need to provide new housing with the requirement to protect Green Belt. We recognise that developing on brownfield sites alone would deliver too few houses (less than 1,000 over the plan period), so that it will be necessary to develop about 50% of new housing on greenfield and, specifically, Green Belt sites. The approach taken in this plan, to allow development on Green Belt sites that result in lower harm to the overall Green Belt whilst only allowing	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on

	development on higher harm Green Belt sites in specific circumstances, delivers the balance that we believe is needed. We acknowledge that the government has defined a Standard Methodology to calculate housing need, but the government accepts that this is based on outdated statistics of expected population / household growth and does not reflect local variations and constraints. As such, it can hardly be described as an "objectively assessed need". In fact, even the National Planning Policy Framework (NPPF) does not do so but simply describes it as a measure of "local housing need". So, whilst the Standard Methodology is clearly a starting point, bearing in mind the potential damage to the Green Belt to meet the figure given by this, it is vital to understand the true objectively assessed need using the latest possible data and considering all local factors. To this end, for the Regulation 18 Consultation conducted in 2021, an independent calculation of the objectively assessed need was conducted, using the latest data from the ONS and other sources. This analysis identified a need for between 4,500 and 5,500 new homes over the plan period to cope with projected population growth, to address the shortage of homes for the 20–40 years age group and to provide the resource required for forecast economic growth. The NPPF makes clear in paragraph 11 b) i) that land constraints such as Green Belt should be taken into account in deciding on the number of new homes to include in the Plan. To achieve the level of housing required to meet that given by the Standard Methodology would require approximately 80% of new housing to be built on Green Belt sites, including sites at the highest level of harm to the Green Belt, without any clear benefit to local community as the amount of housing produced would far exceed the objectively assessed housing need. However, limiting new housing to the level proposed by the Council in this Plan, will produce the housing needed in the district whilst restricting the damage done to the Green Belt. As such, the housing level proposed in this plan fairly balances the need to provide new housing with the requirement to protect Green Belt and therefore this plan has our strong support.	Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review. The standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		**Officer Response Low Growth Option**
Yes	[Summary of comments. Full PDF available on request] The Low Growth option proposed is supported by Chorleywood Parish Council as it balances the need to provide new housing with the requirement to protect Green Belt. We recognise that developing on brownfield sites alone would deliver too few houses (less than 1,000 over the plan period), so that it will be necessary to develop about 50% of new housing on greenfield and, specifically, Green Belt sites. The Low Growth – Green Belt Protection Option used in this plan, to allow development on Green Belt sites that result in lower harm to the overall Green Belt whilst only allowing development on higher harm Green Belt sites in specific circumstances, delivers the balance that we believe is needed. The High Growth Option is based upon the government's Standard Methodology. We acknowledge that the government has defined this methodology as a starting point to calculate housing need, but the government itself accepts that this is based on outdated statistics of expected population / household growth and does not reflect local variations and constraints. As such, it can hardly be described as an "objectively assessed need". In fact, even the National Planning Policy Framework (NPPF) does not do so but simply describes it as a measure of "local housing need". So, whilst the Standard Methodology is a starting point, bearing in mind the potential damage to the Green Belt to meet the figure given by this, it is vital to understand the true objectively assessed need using the latest possible data and considering all local factors. To this end, for the Regulation 18 Consultation conducted in 2021, an independent calculation of the objectively assessed need was conducted, using the latest data from the ONS and other sources. This analysis identified a need for between 4,500 and 5,500 new homes over the plan period to cope with projected population growth, to address the shortage of homes for the 20–40 years age group and to provide the resource required for forecast economic growth.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review. The standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target.

	The NPPF makes clear in paragraph 11 b) i) that land constraints such as Green Belt should be taken into account in deciding on the number of new homes to include in the Plan. To achieve the level of housing required to meet that given by the Standard Methodology (i.e. the High Growth Option) would require approximately 80% of new housing to be built on Green Belt sites, including sites at the highest level of harm to the Green Belt, without any clear benefit to local community as the amount of housing produced would far exceed the objectively assessed housing need. However, limiting new housing to the level proposed by the Council in this Plan by adopting the Low Growth - Green Belt Protection approach, will produce the housing needed in the district whilst restricting the damage done to the Green Belt. As such, the Low Growth – Green Belt Protection option proposed in this plan fairly balances the need to provide new housing with the requirement to protect Green Belt and therefore this plan has our strong support.	
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		**Officer Response Sites not taken forward**
Yes	[Summary of comments. Full PDF available on request] Three Rivers District Council has provided clear rationale as to why the excluded sites are not considered suitable for development which Chorleywood Parish Council supports.	Comments noted.
Q45 & 46 CFS16: Do you agree that the site CFS16 is an appropriate development site?		**Officer Response CFS16**
Neutral	[Summary of comments. Full PDF available on request] - CPC neither agrees or disagrees that the site is an appropriate development site -Request a Master Plan and site layout plans prior to allocation within the plan -Concerns about impact on character and Conservation Area -Concerns about density -Concerns about potential loss of station car parking -Sewerage capacity concerns -Concerns about impact of railway on new residents -Access, parking and highway safety concerns -Concerns about construction -Cocnerns regarding loss of public right of way -Concerns about wildlife, protected species and trees -Infrastructure concerns -Request soil analysis	With regards to the request for a Master Plan and site layout plan, the LPA will discuss this further with the applicant. With regards to concerns relating to impact on character and conservation, through Local Plan policy, any development would be required to respond to distinctive local character (including landscape character) and would have to consider a design criteria. Additionally, policies relating to the protection and preservation of heritage assets would be applied at a planning application stage. Dwellings Per Hectare is indicative only and dwelling capacity will be determined at the planning application stage. Policy on internal and external amenity space standards included in the Local Plan. The station use would remain as part of any development and proposals would need to safeguard parking provision for the station. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. With regards to concerns relating to sewerage capacity, the Infrastructure Delivery Plan prepared in consultation with the infrastructure providers will identify any shortfalls and new provision requirements.

		Potential noise, air quality and light issues etc arising from the site's proximity to the railway would need to be addressed as part of any planning application With regards to access and highway safety concerns, representations from the Hertfordshire Highways Authority will be taken into consideration. With regards to construction concerns, it is likely that a construction management plan would be required at a planning application stage. There is a draft policy in the Local Plan requiring a buffer to Public Right of Ways included in Draft Local Plan. PROW will be kept in place. With regards to wildlife and habitat, the legal requirement for a 10% net gain in biodiversity would be applied at the planning application stage. Policies provide for the retention of trees and hedgerows where possible and replanting, as well as other wildlife related policy. Tree related policies would also be applied at an application stage to protect protected trees. Infrastructure requirements will be identified in the Infrastructure Delivery Plan.
Q47 & 48 CFS16: Do you agree that the site CW9 is an appropriate development site?		**Officer Response CW9**
Neutral	[Summary of comments. Full PDF available on request] As an existing brownfield site, the potential for development is accepted. At the planning application stage it will be necessary to prove that this site will not have an adverse impact due to the loss of parking and is fully compliant with the requirements of the TRDC Local Plan and Chorleywood Neighbourhood Plan.	Comments noted. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety.
Q49 & 50 CFS16: Do you agree that the site CFS18c is an appropriate development site?		**Officer Response CFS18c**
Yes	[Summary of comments. Full PDF available on request] -Chorleywood Parish Council agree that the site is an appropriate development site, however, raise some concerns -Concerns regarding potential loss of Public Right of Way and request buffer. -Concerns about impacts to wildlife -Concerns regarding highway safety and access -Concerns about whether the location is sustainable, particularly in relation to pedestrians and cyclists - A defensible boundary of green belt should be retained -Need further investigation with regards to sewerage capacity -Concerns regarding density	Comments noted. There is a draft policy in the Local Plan requiring a buffer to Public Right of Ways included in Draft Local Plan. PROW will be kept in place. With regards to wildlife and habitat, the legal requirement for a 10% net gain in biodiversity would be applied at the planning application stage. Policies provide for the retention of trees and hedgerows where possible and replanting, as well as other wildlife related policy. Tree related policies would also be applied at an application stage to protect protected trees. With regards to access, highway safety and sustainability concerns, representations from the Hertfordshire Highways Authority will be taken into consideration. The green belt boundary may have to be revised. Consideration of retaining

		defensible boundaries will be undertaken. With regards to concerns relating to sewerage capacity, the Infrastructure Delivery Plan prepared in consultation with the infrastructure providers will identify any shortfalls and new provision requirements. Dwellings Per Hectare is indicative only and dwelling capacity will be determined at the planning application stage. Policy on internal and external amenity space standards included in the Local Plan.
Q51 & 52 ACFS1: Do you agree that the site ACFS1 is an appropriate development site?		**Officer Response ACFS1**
Yes	[Summary of comments. Full PDF available on request] Whilst this site is in Green Belt, it is already developed into a residential dwelling and, therefore, as an existing brownfield site the potential for development is accepted. The sites close proximity to Grade II and II* Listed Buildings and within the Chorleywood Common Conservation Area will mean that any development will have to be designed sensitively to its location. As part of this, any development should set back from both the Chorleywood Road and Christ Church to protect the setting of the listed buildings. It is recommended that parking for the site should be provided under the main building to limit the developed footprint for a Green Belt site. At the planning application stage, it will be necessary to prove that this site is fully compliant with the requirements of the TRDC Local Plan and Chorleywood Neighbourhood Plan.	Comments noted. Through Local Plan policy, any development would be required to respond to distinctive local character (including landscape character) and would have to consider a design criteria. Policies relating to the preservation and protection of heritage assets such as listed buildings and conservation areas would be applied at a planning application stage. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety.
Q53 & 54 NSS23: Do you agree that the site NSS23 is an appropriate development site?		**Officer Response NSS23**
Yes	[Summary of comments. Full PDF available on request] As an existing brownfield site, the potential for development is accepted. The site is in a highly sustainable site very close to local facilities and public transport. The sites proximity to the Chorleywood Station Conservation Area means that the design of its development will need to be sensitive to its setting. At the planning application stage, it will be necessary to prove that this site is fully compliant with the requirements of the TRDC Local Plan and Chorleywood Neighbourhood Plan.	Comments noted. Through Local Plan policy, any development would be required to respond to distinctive local character and would have to consider a design criteria. Policies relating to the protection and preservation of Heritage Assets would be applied at a planning application stage. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. At the planning application stage any proposal would be assesed against relevant national and local policy.
Q61 & 62 P4a: Do you agree that the site P4a is an appropriate development site?		**Officer Response P4a**
Yes	[Summary of comments. Full PDF available on request] As an existing brownfield site, the potential for development is accepted. At the planning application stage, it will be necessary to prove that this site will not have an adverse impact due to the loss of	Comments noted. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause

	parking and is fully compliant with the requirements of the TRDC Local Plan and Chorleywood Neighbourhood Plan.	congestion or harm to amenity or highway safety.
Q63 & 64 P33: Do you agree that the site P33 is an appropriate development site?		**Officer Response P33**
Yes	[Summary of comments. Full PDF available on request] As an existing brownfield site, the potential for development is accepted. At the planning application stage, it will be necessary to prove that this site will not have an adverse impact due to the loss of parking and is fully compliant with the requirements of the TRDC Local Plan and Chorleywood Neighbourhood Plan.	Comments noted. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety.
Q67 & 68 P39: Do you agree that the site P39 is an appropriate development site?		**Officer Response P39**
Yes	[Summary of comments. Full PDF available on request] As an existing brownfield site, the potential for development is accepted. This site previously had planning permission for the development of temporary housing consisting of 6 flats under planning application 18/0322/FUL. This has now lapsed and a new planning application (23/1619/FUL) for 6 affordable rented flats is under consideration.	Comments noted. Application 23/1619/FUL has been permitted.
SC_P4_00021_Buckinghamshire Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
No	[Summary of comments. Full PDF available on request] There are potential consequential impacts upon adjoining authorities if LPAs do not propose to accommodate the level of housing growth established in the Government's standard methodology. There is no current scope within Buckinghamshire to meet potential unmet needs from the TRDC area. The Local Plan for Buckinghamshire is at an early stage of preparation and there is uncertainty about the level of need which will be planned for and how it will be accommodated.	Comments noted. The standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target.
Q55 & 56 EOS12.4: Do you agree that the site EOS12.4 is an appropriate development site?		**Officer Response EOS12.4**
No	[Summary of comments. Full PDF available on request] BC needs to be involved in the preparation of the TRDC transport evidence which is required to support the site allocations close to Buckinghamshire in Maple Cross (ref EOS12.4). It is noted that these sites are smaller in scale compared to those proposed in 2021. However, information on potential transport impacts and mitigations does not appear to have been published to inform the consultation. BC does not agree that EOS12.4 is an appropriate development site. These potential impacts of major sites at Maple Cross have been raised previously by BC and it would be helpful to have response from TRDC with an update on the transport modelling evidence.	Comments noted. With regards to concerns relating to congestion, highway safety, access to the site and sustainability, representations from the Hertfordshire Highways Authority and other relevant bodies will be taken into consideration. The LPA will continue to engage and hold discussions with neighbouring authorities, such as Buckinghamshire Council
SC_P4_00022_Environment Agency		

Q5 & Q6 Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		Officer Response Sites not taken forward
Yes	[Summary of comments. Full PDF available on request] We are pleased to see the removal of CFS60 and ACFS13b following our response earlier this year but are disappointed to see that RWA6 has been given planning permission following appeal. We also note that we weren't consulted given its close proximity to Eastbury pumping station and the fact it's located in an Inner Source Protection Zone (SPZ1), in an area where groundwater is likely to be shallow.	Comments noted.
Q41 & 42 ACFS8b: Do you agree that the site ACFS8b is an appropriate development site?		**Officer Response ACFS8b**
Neutral	[Summary of comments. Full PDF available on request] Development is appropriate if the 8m undeveloped natural buffer zone is provided. Additionally, development should follow a sequential approach placing the most vulnerable development in the lowest risk areas of the site. All development should be outside of FZ3b and all development within the 1 in 100 + Climate Change should be compensated for. Lastly, all development should be safe for its lifetime. The main river Gade is a priority habitat chalk stream. Protected species are also found here. Measures to enhance the watercourse should be sought including removal of hard bed/banks and replaced with soft engineering solution, if necessary; increase sinuosity and morphological diversity; enhance in-channel, marginal aquatic, and bank habitats; establish and manage riparian buffer zones to enhance river corridor. This site is located within a Source protection zone (SPZ) 1. These are designated around potable abstraction and indicative of the location being considered highly sensitive with respect to groundwater. Any proposals should include appropriate risk assessments and remediation measures, if appropriate, and should not negatively impact groundwater quality as required by the NPPF and PPG.	Comments noted. The LPA will discuss the Enviornment Agency's comments with the developer including: -8m undeveloped natural buffer zone is required -Development should follow a sequential approach -Flood resilience -River Gade is priority habitat chalk stream with protected species -Measures to enhance the watercourse should be sought -The site is located within SPZ 1 - Any proposals should include appropriate risk assessments and remediation measures, if appropriate
Q81 & 82 H22a: Do you agree that the site H22a is an appropriate development site?		**Officer Response H22a**
Neutral	[Summary of comments. Full PDF available on request] Development should follow a sequential approach placing the most vulnerable development in the lowest risk areas of the site. Additionally, all development within the 1 in 100 + Climate Change should be compensated for. Lastly, all development should be safe for its lifetime. This site is located within a Source protection zone (SPZ) 1. These are designated around potable abstraction and indicative of the location being considered highly sensitive with respect to groundwater. Any proposals should include appropriate risk assessments and should not negatively impact groundwater quality as required by the NPPF and PPG.	Comments noted. The LPA will discuss the Environment Agency's comments with the developer. Additionally, flood related policies would be applied at the planning application stage.
Q95 & 96 CFS12: Do you agree that the site CFS12 is an appropriate development site?		**Officer Response CFS12**
Neutral	[Summary of comments. Full PDF available on request] Development is appropriate if the 8m buffer zone is provided from the edge of the culvert onsite. Additionally, development should follow a sequential approach placing the most vulnerable development in the lowest risk areas of the site. All development should be outside of FZ3b, and all development within the 1 in 100 + Climate Change should be compensated for. Also, all development should be safe for its lifetime. Furthermore, developers should explore all options of culvert daylighting and re-naturalising of the river channel. This would restore the natural morphology of the river and improve the habitat and biodiversity of the site. This site is located within a Source protection zone (SPZ) 1. These are designated around potable abstraction and indicative of the location	Comments noted. The LPA will discuss the Environment Agency's comments with the developer. Additionally, flood related policies would be applied at a planning application stage.

	being considered highly sensitive with respect to groundwater. Any proposals should include appropriate risk assessments and should not negatively impact groundwater quality as required by the NPPF and PPG.	
Q107 SA: Do you have any comments on the Sustainability Appraisal working note accompanying this consultation.		**Officer Response SA & General Comments**
	[Summary of comments. Full PDF available on request] With regards to the SA we are happy with the framework used to structure and inform the assessment of the Local Plan. We are also pleased to see that changes have been made to correctly identify sites in Source Protection Zones.	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as The Environment Agency as part of its Duty to Co-operate.
General Comments		
	[Summary of comments. Full PDF available on request] We strongly encourage engagement throughout the Local Plan preparation process and are happy to provide additional evidence and advice and/or meet to discuss any of the comments and recommendations provided in this representation.	
SC_P4_00023_Croxley Green Parish Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Yes	[Summary of comments. Full PDF available on request] The Parish Council considers the housing target as calculated using the Government's standard method to be too high and is based on out of date data (2014 population projections) that do not represent the actual development needs for the area. The Parish Council accepts the need for further housing development to meet the needs of the local community. With a growing population, an ageing population, and future changes in household make-up there is a need for more homes, especially affordable homes, so young people are not forced to move away from the area. This should not be provided at the cost of harming existing communities or causing unacceptable harm to the Green Belt.	Comments noted. The standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		**Officer Response Low Growth Option**
Yes	[Summary of comments. Full PDF available on request] Over three quarters (76%) of the District is designated as Green Belt with the remainder of the District made up by the existing urban area consisting of small and medium sized settlements distributed fairly evenly. Three of the five purposes of the Green Belt set out in the National Planning Policy Framework are: (i) to check the unrestricted sprawl of large built-up areas, (ii) to prevent neighbouring towns merging into one another, and (iii) to assist in safeguarding the countryside from encroachment. There is very little undeveloped land within Croxley Green. The remaining areas of Green Belt within the parish, and in adjoining areas, are a vital resource to meet the requirements of the NPPF. Parish Council considers the avoidance of unacceptable harm to the Green Belt to be a key consideration when establishing the level of housing to be delivered through the Local Plan. In addition to protecting the Green Belt, the Parish Council has concerns about the lack of infrastructure to support a substantially increased population locally including, but not limited to, transport, hospitals, schools, water supply and wastewater treatment, and provision for recreation, cultural, and social, activities.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review. With regards to infrastructure, infrastructure requirements will be identified in the Infrastructure Delivery Plan. Additionally, representations from

		relevant bodies such as HWE ICB, Herts County Council (as education authority), Herts Highways and Thames Water will be taken into consideration during the Local Plan process.
Q5 & Q6 Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		**Officer Response Sites not taken forward**
Yes	[Summary of comments. Full PDF available on request] Agree in general, and specifically in relation to site reference CFS19, Land adjacent 62-84 & 99-121 Sycamore Road, Croxley Green. Site CFS19 is not suitable for any development. It provides an important open space for residents and the local community. It was specifically planned and designed for this purpose in the original 1962 estate and surrounding houses. The site continues to fulfil this function and a number of trees have been afforded protection on the boundary and within the site underlining its importance as open space. Development would be contrary to the adopted Neighbourhood Plan policies. Planning Inspectors have dismissed appeals against the local planning authority's refusal of consent on four separate occasions, in 1969, 1993, 2005 and 2020.	Comments noted.
Q83 & 84 CFS20: Do you agree that the site CFS20 is an appropriate development site?		**Officer Response CFS20**
Yes	[Summary of comments. Full PDF available on request] -Concerns with regards to parking for residents and commuters -Request a masterplan (in conjunction with CGPC) -Number of dwellings should be reviewed -Concerns about density and height of dwellings -Require new medical centre -Open space should take into account the nearby Barton Way Recreation area and playground.	With regards to parking, the station use would remain as part of any development and proposals would need to safeguard parking provision for the station. Additionally, through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. The site would be required to provide open space and play space. The LPA will discuss the potential for a masterplan with the developer. With regards to density, Dwellings Per Hectare is indicative only and dwelling capacity will be determined at the planning application stage. Policy on internal and external amenity space standards included in the Local Plan. Additionally, through Local Plan policy, any development would be required to respond to distinctive local character (including landscape character) and would have to consider a design criteria. The HWE ICB are responsible for providing GP services and any planned provision will be included in the Infrastructure Delivery Plan. Their comments will also be taken into consideration.
Q85 & 86 CG16: Do you agree that the site CG16 is an appropriate development site?		**Officer Response CG16**
Yes	[Summary of comments. Full PDF available on request]	Comments noted. Whilst it is noted that the allocation of the site would result in

	The rentable garages in Croxley Green are fully utilised by local residents and businesses and we understand that there is an extensive waiting list. These are a vital resource for our community and should be re-provided on-site as part of the new dwellings or elsewhere within the Parish.	the loss of the garages, as set out in the Council's Local Housing Needs assessment there is a pressing need within the district for housing. The Regulation 18 consultation document states that the Council "will seek to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land". The allocation of garage sites aligns with this approach.
Q87 & 88 CG47: Do you agree that the site CG47 is an appropriate development site?		**Officer Response CG47**
Yes	[Summary of comments. Full PDF available on request] The rentable garages in Croxley Green are fully utilised by local residents and businesses and we understand that there is an extensive waiting list. These are a vital resource for our community and should be re-provided on-site as part of the new dwellings or elsewhere within the Parish.	Comments noted. Whilst it is noted that the allocation of the site would result in the loss of the garages, as set out in the Council's Local Housing Needs assessment there is a pressing need within the district for housing. The Regulation 18 consultation document states that the Council "will seek to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land". The allocation of garage sites aligns with this approach.
Q89 & 90 CG65: Do you agree that the site CG65 is an appropriate development site?		**Officer Response CG65**
No	[Summary of comments. Full PDF available on request] Croxley Green Parish Council OBJECTS to this proposal in the strongest possible terms. The Parish Council promoted a petition in 2021 to save the building for the community which was been signed by more than 600 local people. A full statement of the reasons was prepared on our behalf by Jed Griffiths in 2021 and we fully endorse the reasons for our objection set out in the attached statement. This is a community asset at the heart of our community and should not be redeveloped for social housing. It should be improved and used for the community. We endorse and fully support the need for more affordable housing, and more homes for social rent, in Croxley Green. We applaud the district council for increasing the level of such provision in their policies. We note that recent developments in Croxley Green, such as Killingdown Farm, have provided such homes. Prospective developments, such as at Grove Court, and other sites in this consultation, such as the station (CFS20) and Cinnamond House (CFS61) offer opportunities for further provision, which we welcome. TRDC's own Indoor Leisure Needs Assessment states that the projected growth in housing development is likely to lead to the need for additional spaces for indoor activity. This community facility in the heart of our community must remain.	Comments noted. Unless there is no demonstrable need, provision of the community facility would be required on-site.
Q91 & 92 H9: Do you agree that the site H9 is an appropriate development site?		**Officer Response H9**
Yes	[Summary of comments. Full PDF available on request] This is a small site (0.9 hectare) close to the railway embankment. It is currently allocated for 10 dwellings, which we consider the maximum capacity of the site. Development of this site would also end the	Comments noted. Dwellings Per Hectare is indicative only and dwelling capacity will be determined at the planning application stage. Policy on

	possibility of a Croxley Rail Link / Metropolitan Line Extension which will be needed to cope with the high rise residential housing being constructed on Ascot Road (close by in Watford). Although there may be other proposals to provide high capacity, high speed, transport links between Ascot Road and Watford Town Centre and railway station, we consider they should be linked through Croxley Green to join the metropolitan line and improve accessibility across other parts of Three Rivers.	internal and external amenity space standards included in the Local Plan. With regards to potential further works to the Metropolitan line, representations from TFl and Herts County Council will be taken into consideration.
Q93 & 94 CFS61: Do you agree that the site CFS61 is an appropriate development site?		**Officer Response CFS61**
Yes	[Summary of comments. Full PDF available on request] Suitable for redevelopment, although the current site provides a visual break between the settlements of Croxley Green and Watford and some of the land is within the Green Belt, separating Croxley Green from Watford. Redevelopment would effectively merge the two settlement areas. Dwelling capacity implies high density housing without proximity to high capacity public transport links or shopping centres. Parking is likely to be a significant local issue. The site is described as being 1 hectare, and suitable for 133 dwellings, way in excess of the proposed maximum housing density of 50 dwellings per hectare. This is simply unacceptable at this location. Development of this site would also end the possibility of a Croxley Rail Link / Metropolitan Line Extension which will be needed to cope with the high rise residential housing being constructed on Ascot Road (close by in Watford). We note that there is a fairly well-equipped playground nearby (across the main road) and that the site is within walking distance of Cassiobury Park. Open space should be provided on the area of land currently within the Green Belt (for the reasons stated in the NPPF).	Comments noted. With regards to green belt, we need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review. 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. Dwellings Per Hectare is indicative only and dwelling capacity will be determined at the planning application stage. Policy on internal and external amenity space standards included in the Local Plan. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. With regards to potential further works to the Metropolitan line, representations from TFl and Herts County Council will be taken into consideration. The site would be required to provide open space and play space.
Q107 SA: Do you have any comments on the Sustainability Appraisal working note accompanying this consultation.		**Officer Response SA**
	[Summary of comments. Full PDF available on request] YES. Three Rivers District has a considerable quantity of historic housing with comparatively low energy efficiency. Any new housing should be built to the highest possible energy efficiency standards, to help to meet the District's overall carbon reduction requirements. This sustainability appraisal is not concerned with that particular issue (covered in the draft policy documents previously consulted). Any new developments should consider the energy and transport developments likely over at least the next 50 years, as well as the likely climate changes locally.	Comments noted. Any development would be required to meet Local Plan policies which seek to address climate change, e.g. by requiring the maximum reductions in carbon dioxide emissions against Building Regulations requirements allowed by national policy, requiring 10% biodiversity net-gain, reducing water consumption etc. Local Plan policies have informed the TRDC Climate Emergency &

		Sustainability Strategy. Additionally, development would be required to comply with Building Regulations.
SC_P4_00025_St Albans District Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Neutral	[Summary of comments. Full PDF available on request] SADC notes this approach and raises concerns that TRDC does not appear to be meeting the Government's 'Standard Method' for calculating Local Housing Need (637 homes per annum) in full. SADC does not currently consider that it has any capacity to support TRDC in meeting its housing need. As raised previously in DtC discussions, SADC considers that TRDC will need to be able to evidence that it has fully explored all reasonable options for meeting its housing need within the District. This full exploration is in the context of the rest of South West Herts, including St Albans City & District in particular, being fully bounded by the Metropolitan Green Belt.	Comments noted. The standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target. It is acknowledged that SADC may not be able to support TRDC in meeting its housing need.
General Comments		**Officer Response General Comments**
	[Summary of comments. Full PDF available on request] We look forward to continuing productive Duty to Cooperate (DtC) work between our Local Planning Authorities.	Comments noted. The LPA will continue to undertake discussions with neighbouring Local Authorities such as St Albans District Council as part of its Duty to Co-operate.
SC_P4_00026_HCC Growth & Infrastructure		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Neutral	[Summary of comments. Full PDF available on request] HCC are concerned that the land for homes allocated in this consultation draft is too low.	Comments noted and will be considered in Reg 19 version of the plan.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		**Officer Response Low Housing Option**
Neutral	[Summary of comments. Full PDF available on request] The local planning authority should satisfy itself that it is planning for the appropriate number of new homes that are needed in its administrative boundary, on the basis of national policy requirements, a robust technical evidence base and best-practice.	Comments noted.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		**Officer Response Sites not taken forward**
Yes	[Summary of comments. Full PDF available on request]	Comments noted.

	HCC raised no concerns or objections in relation to any of the sites that the Council are not proposing for development.	
Q7 & 8 AB18: Do you agree that the site AB18 is an appropriate development site?		**Officer Response AB18**
Neutral	[Summary of comments. Full PDF available on request] We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA. Transport. The accommodation of a suitable access to the site should be determined and agreed with the highway authority. Planning for the right of way should be considered from the earliest stages of design.	Agreed that archaeological interest of the site can be conserved through planning conditions. No action necessary. The risk of flooding from various sources noted. TRDC will liaise with the site promoters for a suitable access to the site should be determined and agreed with the highway authority. Need for planning for the right of way should be considered from the earliest stages of design noted.
Q9 & 10 AB26: Do you agree that the site AB26 is an appropriate development site?		**Officer Response AB26**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	Agreed that archaeological interest of the site can be conserved through planning conditions. No action necessary. The risk of flooding from various sources noted. Need for planning for the right of way should be considered from the earliest stages of design noted.
Q11 & 12 AB31: Do you agree that the site AB31 is an appropriate development site?		**Officer Response AB31**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	Agreed that archaeological interest of the site can be conserved through planning conditions. No action necessary. The risk of flooding from various sources noted. Need for planning for the right of way should be considered from the earliest stages of design noted.
Q13 & 14 AB32: Do you agree that the site AB32 is an appropriate development site?		**Officer Response AB32**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Transport. The accommodation of a suitable access to the site should be determined and agreed upon with the highway authority.	Agreed that archaeological interest of the site can be conserved through planning conditions. No action necessary. TRDC will liaise with the site promoters for a suitable access to the site should be determined and agreed with the highway authority.

Q15 & 16 AB39: Do you agree that the site AB39 is an appropriate development site?		Officer Response AB39
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	[Summary of comments. Full PDF available on request] Agreed that archaeological interest of the site can be conserved through planning conditions. No action necessary. The risk of flooding from various sources noted.
Q17 & 18 H3: Do you agree that the site H3 is an appropriate development site?		**Officer Response H3**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Agreed that archaeological interest of the site can be conserved through planning conditions. New text added to with respect to opportunistic mineral extraction and the need for a Site Waste Management Plan (SWMP) to be prepared to support any application.
Q19 & 20 H4: Do you agree that the site H4 is an appropriate development site?		**Officer Response H4**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Agreed that archaeological interest of the site can be conserved through planning conditions. New text added to the site specific comments to reflect the proximity to a historic landfill site on the southern and western parameters and the need investigate contamination risk at the application. Further comments added to reflect opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q21 & 22 H6: Do you agree that the site H6 is an appropriate development site?		**Officer Response H6**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Agreed that archaeological interest of the site can be conserved through planning conditions. New text added to the site specific comments to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q23 & 24 NSS14: Do you agree that the site NSS14 is an appropriate development site?		**Officer Response NSS14**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Agreed that archaeological interest of the site can be conserved through planning conditions. New text added to the site specific comments to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q25 & 26 CFS4: Do you agree that the site CFS4 is an appropriate development site?		**Officer Response CFS4**

Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. Fundamental Ecological Constraint: No - but undeveloped land (rough vegetation and scattered trees / scrub) so biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	Comments noted. A requirement for an archaeological assessment is already covered in the site-specific comments. No fundamental ecological constraints noted. New text to reflect the need to explore biodiversity offsetting/net gain added. Further text added to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q27 & 28 CFS3: Do you agree that the site CFS3 is an appropriate development site?		**Officer Response CFS3**
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities	Comments noted. A requirement for an archaeological assessment is already covered in the site-specific comments about a detailed heritage impact assessment. No fundamental ecological constraints noted. New text to reflect the need to explore biodiversity offsetting/net gain added. Further text added to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application. New text added to explore provision for older persons housing or supported housing for people with disabilities. New text added to suggest that as a large greenfield site, below ground SuDS will not be accepted and any water attenuation needs to be delivered above-ground, and for above-ground conveyance (such as through swales, etc). It is noted that the site is accepted for development subject to a suitable Flood Risk Assessment and drainage strategy. New text reflecting the requirement for Integration and permeability for walking and cycling to the High Elms development (and therefore into the existing settlement) added. TRDC will

	has been included at this site. In accordance with Table 1 (see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Iceni Projects Older Persons and Adult Disability Care Housing Need Model, the county council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.7 LLFA. This site is at low risk of flooding. As a large greenfield site, below ground SuDS will not be accepted. We would expect all surface water attenuation to be delivered above-ground, and for above-ground conveyance (such as through swales, etc) to be prioritised. 12.8 The LLFA agrees that this site is an appropriate development site, subject to a suitable Flood Risk Assessment and drainage strategy. 12.9 Transport. Integration and permeability for walking and cycling to the High Elms development (and therefore into the existing settlement) will be required. 12.10 Vehicle Access from Fraser Crescent would require more information in terms of suitable access for emergency vehicles (due to the number of dwellings being served from a single access point) and an additional emergency only access point may be required. 12.11 General Vehicle access from High Elms Lane will not be supported. 12.12 Protecting, enhancing and connection to the public footpath will be required. 12.13 It is advised that a plan compliant access strategy for the site should be agreed with the highway authority prior to the site's inclusion in any subsequent consultation Local Plans. 12.14 The Active and Safer Travel Team suggested that planning obligations towards improved bus service provision and infrastructure will be required as this site is currently over the recommended accessibility criteria to bus services. Fundamental Ecological Constrainst: No - but undeveloped land (grassland, trees and hedgerows) so biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	liaise with site promoters and HCC to resolve access from from Fraser Crescent including identifying an additional emergency only access point. It is noted that General Vehicle access from High Elms Lane will not be supported. Protection, enhancement and connection to the public footpath covered already in the site specific comments. TRDC will liaise with site promoters for a plan-compliant access strategy for the site should be agreed upon with the highway authority prior to the site's inclusion in any subsequent consultation. Planning obligations towards improved bus service provision and infrastructure will be required as this site is currently over the recommended accessibility criteria to bus services noted. No fundamental ecological constraints noted. New text to reflect the need to explore biodiversity offsetting/net gain added. Further text added to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q29 & 30 CFS6: Do you agree that the site CFS6 is an appropriate development site?		**Officer Response CFS6**
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment	Comments noted. A requirement for an archaeological assessment is already covered in the site-specific comments about a detailed heritage impact assessment. No fundamental ecological constraints noted. New text to reflect the need to explore biodiversity offsetting/net gain added. New text added to explore provision for older persons housing or supported housing for people with disabilities. New text added to suggest that as a large greenfield site, below ground SuDS will not be accepted and any water attenuation needs to be delivered above-ground, and for above-ground conveyance (such as through swales, etc). It is noted that the site is accepted for development subject to a suitable Flood Risk Assessment and drainage strategy. It is noted that Love Lane will not be a

	would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. 12.15 Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities has been included at this site. In accordance with Table 1 (see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Iceni Projects Older Persons and Adult Disability Care Housing Need Model, the County Council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.16 LLFA. This site is at low risk of flooding. As a greenfield site, below ground SuDS will not be accepted. We would expect all surface water attenuation to be delivered above-ground, and for above-ground conveyance (such as through swales, etc) to be prioritised. 12.17 We agree that CFS6 is an appropriate development site subject to a suitable Flood Risk Assessment and drainage strategy. 12.18 Transport. Love Lane will not be a suitable access route to service the site, notably for general vehicle movements. An access strategy should be agreed with the highway authority prior to the site(s) inclusion in site's inclusion in any subsequent consultation Local Plans. It is not considered acceptable, nor sound, in this instance to leave access issues to the planning application stage as there cannot be a reasonable assumption made that suitable access is achievable. 12.19 Love Lane has an existing public footpath that must be retained and protected. 12.20 A plan compliant access strategy for the site should be agreed with the highway authority prior to inclusion in the plan. 12.21 The Active and Safer Travel Team suggested that high quality active travel links should be provided to enable access within the recommended accessibility criteria of 400m to the closest bus services currently run along Bedmond Rd/Tibbs Hill Lane. Fundamental Ecological Constraint: No - but undeveloped land (grassland and hedgerows) so biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	suitable access route to service the site. TRDC will liaise with site promoters for a plan-compliant access strategy for the site should be agreed upon with the highway authority prior to the site's inclusion in any subsequent consultation. Planning obligations towards improved bus service provision and infrastructure will be required as this site is currently over the recommended accessibility criteria to bus services noted. New text added to enable access within the recommended accessibility criteria of 400m to the closest bus services currently run along Bedmond Rd/Tibbs Hill Lane. No fundamental ecological constraints noted. New text to reflect the need to explore biodiversity offsetting/net gain added. Further text added to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q31 & 32 PCS21: Do you agree that the site PCS21 is an appropriate development site?		**Officer Response PCS21**
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific	provision for older persons housing or supported housing for people with disabilities. New text added to suggest that as a large greenfield site, below ground SuDS will not be accepted and any water attenuation needs to be delivered above-ground, and for above-ground conveyance (such as through swales, etc). It is noted that the site is accepted for development subject to a suitable Flood Risk Assessment and drainage strategy. It is noted that Love Lane will not be a suitable access route to service the site. TRDC will liaise with site promoters for a plan-compliant access strategy for the site should be agreed upon with the highway authority prior to the site's inclusion in any subsequent consultation. Planning obligations

	development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. 12.22 Adult Care Services. The county council notes that no provision for supported housing for people with disabilities has been included at this site. It is suggested that in order to meet the need determined in the Iceni Projects Older Persons and Adult Disability Care Housing Need Model, further allocations for supported housing are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.23 Transport. Love Lane will not be a suitable access route to service the site, notably for general vehicle movements. An access strategy should be agreed with the highway authority prior to the site(s) inclusion in site's inclusion in any subsequent consultation Local Plans. It is not considered acceptable, nor sound, in this instance to leave access issues to the planning application stage as there cannot be a reasonable assumption made that suitable access is achievable. 12.24 Love Lane has an existing public footpath that must be retained and protected. 12.25 It is advised that a plan compliant access strategy for the site should be agreed with the highway authority prior to inclusion in the plan. 12.26 The Active and Safer Travel Team suggested that high quality active travel links should be provided to enable access within the recommended accessibility criteria of 400m to the closest bus services currently run along Bedmond Road/Tibbs Hill Lane. Fundamental Ecological Constraint: No - but undeveloped land (grassland and scattered trees / scrub) so biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	towards improved bus service provision and infrastructure will be required as this site is currently over the recommended accessibility criteria to bus services noted. New text added to enable access within the recommended accessibility criteria of 400m to the closest bus services currently run along Bedmond Rd/Tibbs Hill Lane. No fundamental ecological constraints noted. New text to reflect the need to explore biodiversity offsetting/net gain added. Further text added to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q33 & 34 CFS65: Do you agree that the site CFS65 is an appropriate development site?		**Officer Response CFS65**
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation.	Comments noted. No action necessary as these points have been covered in site-specific information.

	7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. 12.27 Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities has been 23 included at this site. In accordance with Table 1 (see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Iceni Projects Older Persons and Adult Disability Care Housing Need Model, the County Council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.28 LLFA. This site is at low risk of flooding. As a greenfield site, below ground SuDS will not be accepted. We would expect all surface water attenuation to be delivered above-ground, and for above-ground conveyance (such as through swales, etc) to be prioritised. 12.29 It is considered that CFS65 is an appropriate development site subject to a suitable Flood Risk Assessment and drainage strategy. 12.30 Transport. As stated in the previous representation it is not clear how the proposed site-specific requirement for an access from the A405 can align with plan policy, and would be resisted by the highway authority on a range of policy and technical grounds. 12.31 Any policy specifying modal links should be with the agreement of the highway authority. 12.32 A plan compliant access strategy for the site should be agreed prior to inclusion in the plan. 12.33 The Active and Safer Travel Team suggested that high quality active travel links should be provided to enable access within the recommended accessibility criteria of 400m to the closest bus services currently run along A405. 12.34 Waste Management. The WDA requires strategically located facilities for the management of Local Authority Collected Waste (LACW). As identified in the WDAs LACW Spatial Strategy (2021)9, the effective management of residual waste arising in the county is heavily reliant on the Waterdale Transfer Station which is located within close proximity to the proposed development. 12.35 The Spatial Strategy notes that the Waterdale Transfer Station has significant potential for short, medium and long-term improvements that would substantially improve the resilience of the WDAs residual waste arrangements and its ability to sustainably manage current and future LACW waste. 12.36 The county council have acquired the parcel of land to the south of the existing waste facilities at Waterdale Transfer Station, known as Brookdell Yard. This 9 LACW Spatial Stratergy (hertfordshire.gov.uk) 24 area of land will be used to improve operations at the Waterdale Transfer Station and planning permission has been granted for the development of a purpose-built facility for shredding bulky waste such as furniture and mattresses. Planned longer term improvements are for the footprint of the main tipping hall to be increased and the main tipping hall and vehicle apron to be enclosed. Fast acting doors, improved odour suppression and fire prevention systems are proposed and a planning application for these planned improvements will be submitted in due course. 12.37 While the Waterdale Transfer Station is, and will continue to be, operated in line with Environment Agency Permit requirements, the nature of the facility means that odour and noise occur. Complaints in relation to operation of the transfer station have been received from the new Farriers Way development and the WDA is concerned that the introduction of housing within site CFS65, located to the south of the facility will lead to increased complaints.	

	12.38 The WDA supports the Waste Planning Authority's previous request that the applicant adjusts the proposed buffer distance of 100m to start from the southern most boundary of Brookdell Yard and that appropriate weight should be given to the 'Agent of Change' principle (NPPF, paragraph 187) which states that planning decisions on new developments should ensure integration with existing business such that they do not have unreasonable restrictions placed upon them. This principle should be required for any extension to the existing facility. 12.39 The WDA requests that the TRDC gives proper consideration to the implementation of requirements on developers of this land that will mitigate the risk of the Waterdale Transfer Station adversely impacting on users of the proposed development. Fundamental Ecological Constraint: No - but undeveloped land (rough vegetation and scattered trees / scrub) so biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	
Q35 & 36 NSS2: Do you agree that the site NSS2 is an appropriate development site?		**Officer Response NSS2**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Fundamental Ecological Constraint: No – developed site. Avoid illuminating adjacent trees / woodland.	Noted. Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. No fundamental ecological constraints noted. No action considered necessary in repect to site details.
Q37 & 38 NSS6a: Do you agree that the site NSS6a is an appropriate development site?		**Officer Response NSS6a**
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. Transport. It is not considered acceptable nor sound in this instance to leave access issues to the planning application stage as there cannot be a reasonable assumption made that suitable access is achievable. A plan compliant access strategy for the site should be agreed with the highway authority prior to inclusion in the plan. Fundamental Ecological Constraint: No – but partially undeveloped site, partially developed. Southern area is grassland. Biodiversity	Comments noted. Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. No fundamental ecological constraints noted. Transport: TRDC will liase with the developer and HCC to agree a plan compliant access strategy for the Reg 19 version of the Plan. New text is added to site-specific comments to reflect this including the need to explore biodiversity offsetting/net gain. Noted that there are no fundamental ecological constraint.

	offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	
Q39 & 40 NSS6a: Do you agree that the site NSS10 is an appropriate development site?		**Officer Response NSS10**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Fundamwntal Ecological Constraint: No – Brownfield site used for storage. Rough vegetation, scrub and bare ground. Biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	Noted. Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. No fundamental ecological constraints noted. Requirement for biodiversity net gain is covered in the Biodiversity, Trees, Woodlands and Landscaping policy in the local plan. No action necessary. No action necessary
Q41 & 42 ACFS8b: Do you agree that the site ACFS8b is an appropriate development site?		**Officer Response ACFS8b**
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. Fundamental Ecological Constraint: No - but partially undeveloped site (rough vegetation and scattered trees / scrub) so biodiversity offsetting / net gain might be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	Noted. Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. No fundamental ecological constraints noted. Requirement for biodiversity net gain is covered in the Biodiversity, Trees, Woodlands and Landscaping policy in the local plan. No action necessary.
Q43 & 44 H7: Do you agree that the site H7 is an appropriate development site?		**Officer Response H7**
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted.	Noted. Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. No fundamental ecological constraints noted. Requirement for biodiversity net gain is covered in the Biodiversity, Trees, Woodlands and Landscaping policy in the local plan. No action necessary.

	7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works.	
Q45 & 46 H7: Do you agree that the site H7 is an appropriate development site?		**Officer Response H7**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. 12.44 Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities has been included at this site. In accordance with Table 1(see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Iceni Projects Older Persons and Adult Disability Care Housing Need Model, the County Council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.45 LLFA. There is a high-risk surface water flow path at the north-west of the site, and the LLFA has record of multiple property flooding incidents in the vicinity of the site. 12.46 Parts of the existing car park are modelled to be at medium risk (1:100 year) of flooding from surface water. More of the car park is at risk during 1:1000-year storms. 12.47 It is considered that CFS16 is an appropriate development site subject to a suitable Flood Risk Assessment and drainage strategy, which must consider the issues above. 12.48 Transport. The Active and Safer Travel Team suggested that the central location of the site will enable walking/cycling to the services/facilities in the centre of Chorleywood. Rail services may be more attractive from this site than bus services which are currently limited in frequency. Opportunities to improve sustainable mode access to the station should be explored. Fundamental Ecological Constraint: No –developed site with railway line. Wooded strips so if trees affected then biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024. Southern edge borders Chorleywood Common LWS / LNR so buffer and no adverse effects expected.	Comments noted. Archaeological assessment requirement at the point of application. Additional text inserted in the site-specific comments in the local plan including surface water flooding propensity and need for a FRA and drainage strategy. Additional text inserted ref older persons housing. No fundamental Ecological Constraint noted including any biodiversity net gain/offsetting provision where relevant. New text added to emphasise active travels and sustainable transport.- but undeveloped land (rough vegetation and scattered trees / scrub) so biodiversity offsetting / net gain would be expected.
Q47 & 48 CW9: Do you agree that the site CW9 is an appropriate development site?		**Officer Response CW9**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological	Noted. Agree that archaelogical interest of these sites can be dealt with through conditions and planning

	conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	application stage. Potential flood risk noted which is captured in the site information. No action necessary.
Q49 & 50 CFS18c: Do you agree that the site CFS18c is an appropriate development site?		**Officer Response CFS18c**
Neutral	[Summary of comments. Full PDF available on request] Transport. A planned compliant access strategy for the site should be agreed with the highway authority prior to inclusion in the plan. This will need to demonstrate a deliverable solution to the clear constraints the existing highway presents to all users. Fundamental Ecological Consraint: No – Farmhouse and yard / barns with some semi-natural vegetation. Biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024. The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works.	A need for a plan compliant access strategy prior to inclusion in the plan is noted. Liaison with HCC and site promoters to is ongoing to achieve this. No fundameental ecological constraints noted. Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. Requirement for biodiversity net gain is covered in the Biodiversity, Trees, Woodlands and Landscaping policy in the local plan. No action necessary n relation to this.
Q51 & 52 ACFS1: Do you agree that the site ACFS1 is an appropriate development site?		**Officer Response ACFS1**
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61.	Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this.

	7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. Fundamental Ecological Constraint: No – developed site but has trees and scrub. Biodiversity offsetting / net gain might be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	
Q53 & 54 NSS23: Do you agree that the site NSS23 is an appropriate development site?		**Officer Response NSS23**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this.
Q55 & 56 EOS12.4: Do you agree that the site EOS12.4 is an appropriate development site?		**Officer Response EOS12.4**
Neutral	[Summary of comments. Full PDF available on request] 12.53 Adult Care Services. The county council notes that no provision for older persons housing has been included at this site. In accordance with Table 1 (see general comments section), the County Council recommends the inclusion of one extra-care facility comprising of 70-80 self-contained units. 12.54 LLFA. The site is generally at low risk of flooding, however there are small, localised areas of surface water ponding, which should be mitigated by any proposed drainage designs. 12.55 As a large greenfield site, below ground SuDS will not be accepted. We would expect all surface water attenuation to be delivered above-ground, and for above-ground conveyance (such as through swales, etc) to be prioritised. 12.56 The site is indicated to have low potential for groundwater emergence (less than 25%), however is in close proximity to areas at high risk of groundwater flooding to the east. Ground investigations should be undertaken at the application stage. 12.57 It is considered that EOS12.4 is an appropriate development site subject to a suitable Flood Risk Assessment and drainage strategy, which must consider the issues above including groundwater flood risk. 12.58 Transport. The revised scale raises concerns around the sustainable possibility of the proposal, noting a lack of possible internalisation within the settlement itself. Recent changes to public transport in the area also reduce the sustainable transport opportunities, with limited options to travel other than private car. 12.59 The LPA should be able to demonstrate the sustainability of the allocation given its scale and relationship with the existing settlement. 12.60 The Active and Safer Travel Team suggested that a revised bus strategy for the site will need to be developed. The services in the area have changed recently, but the quantum of development proposed should enable service improvement, subject to further discussions with operators.	Adult care: A need for 70-80 self-contained extra care facility noted. Additional text inserted in the site-specific comments in the local plan including surface water flooding propensity and need for a FRA and drainage strategy. Noted the revised scale of the development may impact the levels of public benefits, including delivering sustainable transport on site. Sustainable travel is covered in part covered by the Sustainable Transport policy in the Local Plan. No action necessary. The request for justifying the sustainability of the allocation given its scale and relationship with the existing settlement. is noted, which will be further confirmed through the local plan viability and Infrastructure Delivery Plan (both ongoing). Also, the request for a revised bus strategy for the site to enable service improvement is noted. Discussion with bus operators and HCC will be undertaken to fullfill this.

Q57 & 58 MC11: Do you agree that the site MC11 is an appropriate development site?		Officer Response MC11
Neutral	[Summary of comments. Full PDF available on request] Archaeology (HCC) - The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. LLFA (HCC) - We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	Noted no fundamental ecological constraints including possible archaelogical requirement at planning application stage.
Q59 & 60 EOS 7.0: Do you agree that the site EOS 7.0 is an appropriate development site?		**Officer Response EOS 7.0**
Neutral	[Summary of comments. Full PDF available on request] Adult Care Services. The county council notes that no provision for older persons housing has been included at this site. In accordance with Table 1 (see general comments section), the county council recommends the inclusion of one extra-care facility comprising of 70-80 self-contained units. LLFA. The site is generally at low flood risk, with a small area at high risk of surface water ponding to the east of the site adjacent to King George V Playing Field. It is considered that this site is an appropriate development site subject to a suitable Flood Risk Assessment and drainage strategy. Transport. The Active and Safer Travel Team suggested that a bus strategy for the site will need to be developed. The quantum of development proposed should enable some degree of service improvement, subject to further discussions with operators. Service improvement may also be affected by delivery of development on EOS12.4 and any developer contributions from there. Children's Services (School Place Planning including SEND). The preferred Local Plan lower growth scenario makes provision for approximately 900 new homes, including existing commitments, across the Rickmansworth (and Mill End) area. Using the tiered strategic planning approach, this equates to planning to be able to accommodate approximately 2FE of demand. At the primary phase, the provision of a new primary school site at EOS7.0 would be supported within this growth scenario, to ensure potential demand arising from new homes can be met locally. The site should be of sufficient size (2.03ha) to be capable of providing up to 2FE of new primary phase provision. At the secondary phase, the retention of the (residual) existing education allocation at Long Lane Mill End for maintained education would help facilitate up to 6FE of new secondary provision to meet potential demand arising from growth across Chorleywood, Maple Cross and Rickmansworth.	Comments Noted. Additional text added to site specific comments in relation to provision for older persons housing. High risk of surface water ponding to the east of the site adjacent to King George V Playing Field noted including the need for an flood risk and drainage assessment. TRDC will liaise with bus operators and HCC regarding bus service improvements and a bus strategy in conjunction with site EOS 12.4. New text for the provision of a 2FE school is added. Potential need for the education provision at the secondary phase noted.
Q61 & 62 P4a: Do you agree that the site P4a is an appropriate development site?		**Officer Response P4a**
Neutral	[Summary of comments. Full PDF available on request] The site has been identified for post application consultation on archaelogy. Brownfield site and no ecological constraints. Site capacity is under 10 units so planning application has been considered minor.	No ecology constraints noted including need for post-application consultation.
Q63 & 64 P33: Do you agree that the site P33 is an appropriate development site?		**Officer Response P33**
Neutral	[Summary of comments. Full PDF available on request] The site has been identified for post application consultation on archaelogy. Brownfield site and no ecological contraints. Site capacity is under 10 units so planning application has been considered minor.	Comments noted.
Q65 & 66 P38: Do you agree that the site P38 is an appropriate development site?		**Officer Response P38**

Neutral	[Summary of comments. Full PDF available on request] The site has been identified for post application consultation on archaelogy. Brownfield site and no ecological contraints. Site capacity is under 10 units so planning application has been considered minor.	Comments noted.
Q67 & 68 P39: Do you agree that the site P39 is an appropriate development site?		**Officer Response P39**
Neutral	[Summary of comments. Full PDF available on request] The site has been identified for post application consultation on archaelogy. Brownfield site and no ecological contraints. Site capacity is under 10 units so planning application has been considered minor.	Comments noted.
Q69 & 70 RW31: Do you agree that the site RW31 is an appropriate development site?		**Officer Response RW31**
Neutral	[Summary of comments. Full PDF available on request] Large area of gardens with amenity grassland, hedgerows and trees, so biodiversity offsetting / net gain might be expected. The site has been identified for post application consultation on archaelogy.	Comments noted.
Q71 & 72 H15: Do you agree that the site H15 is an appropriate development site?		**Officer Response H15**
Neutral	[Summary of comments. Full PDF available on request] The site has been identified for post application consultation on archaeology.	Comments noted.
Q73 & 74 CFS59: Do you agree that the site H15 is an appropriate development site?		**Officer Response CFS59**
Neutral	[Summary of comments. Full PDF available on request] Adult Care Services. The county council notes that a 75 bed C2 care home has been included at this site. The county council is supportive of the inclusion of a nursing home at this site and as long as the site meets the locational criteria set out at Table 2 (see general comments section). Fundamental Ecological Constraint: No – but four undeveloped grassland fields with boundary trees so biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	Support noted. New text added in the comment section to reflect HCC views on the need for biodiversity offsetting/net gain.
Q75 & 76 CFS40a: Do you agree that the site CFS40a is an appropriate development site?		**Officer Response CFS40a**
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works.	Comments noted. Site specific comments capture most of the points made. Requirement to explore the adult care provision has been noted and new text added to site specific comments.

	12.71 Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities has been included at this site. In accordance with Table 1 (see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Iceni Projects Older Persons and Adult Disability Care Housing Need Model, the County Council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.72 LLFA. The site is generally at low risk of surface water flooding apart from an area at high risk of surface water ponding on Caravan Lane. There is an ordinary watercourse at the southeast corner of the site. It would be important for any applications to model this watercourse to ensure its floodplain does not impact on the site. 12.73 The site is indicated to have very high potential (>75%) for groundwater emergence. Site-specific ground investigations should be conducted to assess groundwater levels at the earliest stage of any potential development. 12.74 The groundwater flood risk should be investigated at the initial stages of any future development as it may impact on foundation depths, sewers and SuDS features. For avoidance of doubt, areas at groundwater flood risk should be avoided. Any sequential testing should consider groundwater flood risk. Fundamental Ecological Constraint: No – partially developed site with railway line and wooded banks. If trees affected then biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	
Q77 & 78 H17: Do you agree that the site H17 is an appropriate development site?		**Officer Response H17**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Comments on exploring archaeological interest at the planning application stage noted.
Q79 & 80 H18: Do you agree that the site H18 is an appropriate development site?		**Officer Response H18**
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation.	Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this. Comments on localised flood noted.

	7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	
Q81 & 82 H22a: Do you agree that the site H22a is an appropriate development site?		**Officer Response H22a**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Adult Care Services. The county council notes that no provision for supported housing for people with disabilities has been included at this site. The county council suggests that, in order to meet the need determined in the Iceni Projects Older Persons and Adult Disability Care Housing Need Model, further allocations for supported housing are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). Fundamental Ecological Constraint: No – previously developed land. We are pleased to see that part of Stockers Farm Meadow Local Wildlife Site (LWS) has now been removed from this boundary. Any development should have a buffer to the north and west against the adjacent LWS, to avoid any adverse impact.	Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this. New text added to site specific comments to explore adult care provision. New text regarding the need for a buffer to the north and west added to site specific comments.
Q83 & 84 CFS20: Do you agree that the site CFS20 is an appropriate development site?		**Officer Response CFS20**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. 12.80 Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities has been included at this site. In accordance with Table 1 (see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Iceni Projects Older Persons and Adult Disability Care Housing Need Model, the County Council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.81 LLFA. The site is generally at low risk of surface water flooding apart from an area at high risk of surface water ponding on at the north of the site adjacent to Watford Road. 12.82 The site is indicated to have high potential (>50%) for groundwater emergence. Site-specific ground investigations should be conducted to assess groundwater levels at the earliest stage of any potential development. 12.83 The site is likely to be appropriate for development with respect to flood risk however groundwater flood risk should be investigated at the initial stages of any future development as it may impact on foundation depths, sewers and SuDS features. The site is also in	New text added to explore provision for older persons housing or supported housing for people with disabilities to the site specific comments including the need for site-specific ground investigations should be conducted to assess groundwater levels at the earliest stage of any potential development. No ecological constraints noted. New text added to explore biodiversity offsetting/net gain.

	groundwater Source Protection Zone 1; therefore groundwater contamination must be strictly avoided. Fundamental Ecological Constraint: No –developed site with railway line. Wooded strip so if trees affected then biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	
Q85 & 86 CG16: Do you agree that the site CG16 is an appropriate development site?		**Officer Response CG16**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this. Possible flood issues noted. No action necessary.
Q87 & 88 CG47: Do you agree that the site CG47 is an appropriate development site?		**Officer Response CG47**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this. Possible flood issues noted. No action necessary.
Q89 & 90 CG65: Do you agree that the site CG65 is an appropriate development site?		**Officer Response CG65**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this. Possible flood issues noted. No action necessary.
Q91 & 92 H9: Do you agree that the site H9 is an appropriate development site?		**Officer Response H9**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Fundamental Ecological Constraint: No – developed site. Bordered by broadleaved woodland to the west so buffer may be advisable.	Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this. Possible flood issues noted. No fundamental ecological constraints noted. No action necessary.
Q93 & 94 CFS61: Do you agree that the site CFS61 is an appropriate development site?		**Officer Response CFS61**

Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities has been included at this site. In accordance with Table 1 (see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Iceni Projects Older Persons and Adult Disability Care Housing Need Model, the County Council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.85 LLFA. A significant area of the site is at high risk of flooding from surface water from an off-site flow path to the west. The LPA may wish to ensure this site passes as sequential test. 12.86 The site is indicated to have high potential (>50%) for groundwater emergence. Site-specific ground investigations should be conducted to assess groundwater levels at the earliest stage of any potential development. 12.87 Based on the above, we do not think this site is appropriate for development unless it can pass the sequential test and suitable mitigation provided for the substantial surface water flood risk on site. This is likely to require a significant amount of attenuation which may reduce the quantum of housing. Fundamental Ecological Constraint: No – developed site, half paved with x1 building, half amenity grass and boundary trees. Biodiversity offsetting / net gain might be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	Agree that archaelogical interest of these sites can be dealt with through conditions and planning application stage. Possible flood issues noted. No fundamental ecological constraints noted. New text added to explore provision for older persons housing or supported housing for people with disabilities to the site specific comments. The site will be subject to sequential testing for flood impact.
Q95 & 96 CFS12: Do you agree that the site CFS12 is an appropriate development site?		**Officer Response CFS12**
Neutral	[Summary of comments. Full PDF available on request] The site has been identified for post application consultation on archaelogy. The county council notes that no provision for supported housing for people with disabilities has been included at this site.	Comments noted and new text added to the site specific coments in relation to the provision for older persons housing.
Q97 & 98 AS13: Do you agree that the site AS13 is an appropriate development site?		**Officer Response AS13**

Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Adult Care Services. The county council notes that no provision for supported housing for people with disabilities has been included at this site. It is suggested that, in order to meet the need determined in the Iceni Projects Older Persons and Adult Disability Care Housing Need Model, further allocations for supported housing are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). Fuindamental Ecological Constraint: No - partially developed site with are of rough vegetation / scrub; if affected then biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	Comments noted. Archaeological assessment requirement at the point of application. Additional text inserted ref older persons housing. No fundamental Ecological Constraint noted. Additional text re biodiversity net gain/offsetting provision added.
Q99 & 100 AS31: Do you agree that the site AS31 is an appropriate development site?		**Officer Response AS31**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	Comments noted. Archaeological assessment requirement at the point of application.
Q101 & 102 BR20: Do you agree that the site BR20 is an appropriate development site?		**Officer Response BR20**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Adult Care Services. The county council notes the comments included in the consultation document for this site 'Northwick Road Day Centre facility would need to be re-provided in the local area as part of any development'. It is the county council's intention to re-provide this existing day service at the southern parcel of the Sir James Altham site, site reference CFS52.	Comments noted. Archaeological assessment requirement at the point of application. Amendements made in relation to the provision of Northwick Road Day Centre at the southern parcel of the site CFS52.
Q103 & 104 PCS16: Do you agree that the site PCS16 is an appropriate development site?		**Officer Response PCS16**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory	Comments noted. Archaeological assessment requirement at the point of application. Additional text inserted ref older persons housing. No fundamental Ecological Constraint noted. New text added re any biodiversity net gain/offsetting provision.

	consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA. Fundamental Ecological Constraint: No – developed site. However large gardens with amenity grassland and mature trees so biodiversity offsetting / net gain might be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024	
Q105 & 106 H24: Do you agree that the site H24 is an appropriate development site?		**Officer Response H24**
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Comments noted. Archaeological assessment requirement at the point of application.
SC_P4_00026_HCC Minerals & Waste		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Lower Housing**
Neutral	[Summary of comments. Full PDF available on request] The Minerals and Waste Planning Authority (MWPA) has no comments to make on the Council's proposal to not comply with the Government's Standard Method for calculating the District's housing need figure. In the context of responding to Local Plan consultations, the Minerals and Waste Planning Authority's (MWPA) interests relate to the safeguarding of minerals and waste infrastructure, the safeguarding of mineral deposits and the management of waste arising, particularly those arisings coming from the demolition and construction of built development.	Comments noted.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		**Officer Response Low Growth Option**
Neutral	[Summary of comments. Full PDF available on request] In the context of responding to Local Plan consultations, the Minerals and Waste Planning Authority's (MWPA) interests relate to the safeguarding of minerals and waste infrastructure, the safeguarding of mineral deposits and the management of waste arising, particularly those arisings coming from the demolition and construction of built development.	Comments noted.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		**Officer Response Sites not taken forward**
Yes	[Summary of comments. Full PDF available on request] The MWPA raises no concerns or objections in relation to any of the sites that the Council are not proposing for development.	Comments noted.
Q7 & 8 AB18: Do you agree that the site AB18 is an appropriate development site?		**Officer Response AB18**
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Minerals/Waste: Comments noted.
Q9 & 10 AB26: Do you agree that the site AB26 is an appropriate development site?		**Officer Response AB26**
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral	Comments noted.

	sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	
Q11 & 12 AB31: Do you agree that the site AB31 is an appropriate development site?		**Officer Response AB31**
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q13 & 14 AB32: Do you agree that the site AB32 is an appropriate development site?		**Officer Response AB32**
Yes	[Summary of comments. Full PDF available on request] The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planing application stage.
Q17 & 18 H3: Do you agree that the site H3 is an appropriate development site?		**Officer Response H3**
Yes	[Summary of comments. Full PDF available on request] The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	H6: Agreed that archaeological interest of the site can be conserved through planning conditions. New text added to the site specific comments to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q19 & 20 H4: Do you agree that the site H4 is an appropriate development site?		**Officer Response H4**
Yes	[Summary of comments. Full PDF available on request] In response to question 19, our records show that the southern and western parameters of site H4 adjoin a Historic Landfill site (reference: EAHLD32349). The presence of and risk from contaminative materials should be a consideration in any proposal at this site. The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits	Comments noted. The LPA will discuss these comments with the developer including, the consideration of contaminative materials, opportunistic extraction during construction and the need for a SWMP at planing application stage.

	beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	
Q21 & 22 H6: Do you agree that the site H6 is an appropriate development site?		**Officer Response H6**
Yes	[Summary of comments. Full PDF available on request] The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planing application stage
Q23 & 24 NSS14: Do you agree that the site NSS14 is an appropriate development site?		**Officer Response NSS14**
Yes	[Summary of comments. Full PDF available on request] The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planing application stage
Q25 & 26 CFS4: Do you agree that the site CFS4 is an appropriate development site?		**Officer Response CFS4**

Neutral	[Summary of comments. Full PDF available on request] The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planning application stage
Q27 & 28 CFS3: Do you agree that the site CFS3 is an appropriate development site?		**Officer Response CFS3**
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site, but careful consideration must be given to the mineral matters set out below. Should the District Council be minded to continue to include this allocation, the need to assess the potential suitability of mineral extraction and how this requirement will fit in with the site's delivery and it's supporting text (or policy text where appropriate) will need to be considered. Site CFS3 is 7.1 hectares and has the potential to accommodate up to 303 dwellings. Site CFS3 is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. BGS data also identifies potential superficial sand/gravel deposits beneath the site. Adopted Minerals Local Plan Policy 5: Mineral Sterilisation states: Mineral extraction will be encouraged prior to other development taking place where any significant mineral resource would otherwise be sterilised, or where despoiled land would be improved following restoration. The County Council will object to any development proposals within, or adjacent to areas of potential mineral resource, which would prevent, or prejudice potential future mineral extraction unless it is clearly demonstrated that: i. the land affected does not contain potentially workable mineral deposits; and/or ii. there is an overriding need for the development; and iii. the mineral cannot practically be extracted in advance. In accordance with paragraph 212 of the NPPF development proposals in Mineral Safeguarding Areas that might constrain potential future use for mineral working should not normally be permitted. Given the size of the allocation coupled with the potential for sand and gravel deposits to be present beneath the site, the Minerals Planning Authority would request a site investigation and evaluation by way of a Minerals Resource Assessment (MRA) to assess the potential for workable mineral deposits and avoid the possibility of mineral sterilisation. MRAs should be undertaken as early as possible to identify whether prior extraction of sand and gravel will be necessary ahead of developing the site for residential use. If it is identified through the MRA that the prior extraction of sand and gravel is viable at this site, then a separate planning application for mineral extraction will need to be submitted to the Minerals Planning Authority. The District Council is advised to include a requirement on the need for a MRA within the appropriate policy or appropriate section of commentary for this site allocation within the Plan.	Comments noted. The LPA will discuss these comments with the developer including the need to assess the potential suitability of mineral extraction (and that the County Council will object to development jeopardising future mineral extraction), opportunistic extraction during construction and the need for a SWMP at planing application stage.

	With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	
Q29 & 30 CFS6: Do you agree that the site CFS6 is an appropriate development site?		**Officer Response CFS6**
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site, but careful consideration must be given to the mineral matters set out below. Should the District Council be minded to continue to include this allocation, the need to assess the potential suitability of mineral extraction and how this requirement will fit in with the site's delivery and it's supporting text (or policy text where appropriate) will need to be considered. Site CFS6 is 2.8 hectares and has the potential to accommodate up to 133 dwellings. The Plan states that the site could come forward together with adjacent site PCS21 Land at Love Lane. Site PCS21 is 1.3 hectares and has the potential to accommodate up to 62 dwellings. County of opportunity Both sites are located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. BGS data also identifies potential superficial sand/gravel deposits beneath both sites. Adopted Minerals Local Plan Policy 5: Mineral Sterilisation states: Mineral extraction will be encouraged prior to other development taking place where any significant mineral resource would otherwise be sterilised, or where despoiled land would be improved following restoration. The County Council will object to any development proposals within, or adjacent to areas of potential mineral resource, which would prevent, or prejudice potential future mineral extraction unless it is clearly demonstrated that: i. the land affected does not contain potentially workable mineral deposits; and/or ii. there is an overriding need for the development; and iii. the mineral cannot practically be extracted in advance. In accordance with paragraph 212 of the NPPF development proposals in Mineral Safeguarding Areas that might constrain potential future use for mineral working should not normally be permitted. Given the size of the allocations (when considered together as one) coupled with the potential for sand and gravel deposits to be present beneath the site, the Minerals Planning Authority would request a site investigation and evaluation by way of a MRA to assess the potential for workable mineral deposits and avoid the possibility of mineral sterilisation. MRAs should be undertaken as early as possible to identify whether prior extraction of sand and gravel will be necessary ahead of developing the site for residential use. If it is identified through the MRA that the prior extraction of sand and gravel is viable at this site, then a separate planning application for mineral extraction will need to be submitted to the Minerals Planning Authority. The District Council is advised to include a requirement on the need for a MRA within the appropriate policy or appropriate section of commentary for this site allocation within the Plan.	Comments noted. The LPA will discuss these comments with the developer including the need to assess the potential suitability of mineral extraction (and that the County Council will object to development jeopardising future mineral extraction), opportunistic extraction during construction and the need for a SWMP at planning application stage.
Q31 & 32 PCS21: Do you agree that the site PCS21 is an appropriate development site?		**Officer Response PCS21**
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site, however, careful consideration should be given to minerals and waste matters. Site CFS6 is 2.8 hectares and has the potential to accommodate up to 133 dwellings. The Plan states that the site could come forward together with adjacent site PCS21 Land at Love Lane. Site PCS21 is 1.3 hectares and has the potential to accommodate up to 62 dwellings.	Comments noted. The LPA will discuss these comments with the developer including the need to assess the potential suitability of mineral extraction (and that the County Council will object to development jeopardising future mineral extraction), opportunistic extraction during construction and the

	County of opportunity Both sites are located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. BGS data also identifies potential superficial sand/gravel deposits beneath both sites. Adopted Minerals Local Plan Policy 5: Mineral Sterilisation states: Mineral extraction will be encouraged prior to other development taking place where any significant mineral resource would otherwise be sterilised, or where despoiled land would be improved following restoration. The County Council will object to any development proposals within, or adjacent to areas of potential mineral resource, which would prevent, or prejudice potential future mineral extraction unless it is clearly demonstrated that: i. the land affected does not contain potentially workable mineral deposits; and/or ii. there is an overriding need for the development; and iii. the mineral cannot practically be extracted in advance. In accordance with paragraph 212 of the NPPF development proposals in Mineral Safeguarding Areas that might constrain potential future use for mineral working should not normally be permitted. Given the size of the allocations (when considered together as one) coupled with the potential for sand and gravel deposits to be present beneath the site, the Minerals Planning Authority would request a site investigation and evaluation by way of a MRA to assess the potential for workable mineral deposits and avoid the possibility of mineral sterilisation. MRAs should be undertaken as early as possible to identify whether prior extraction of sand and gravel will be necessary ahead of developing the site for residential use. If it is identified through the MRA that the prior extraction of sand and gravel is viable at this site, then a separate planning application for mineral extraction will need to be submitted to the Minerals Planning Authority. The District Council is advised to include a requirement on the need for a MRA within the appropriate policy or appropriate section of commentary for this site allocation within the Plan.	need for a SWMP at planning application stage.
Q33 & 34 CFS65: Do you agree that the site CFS65 is an appropriate development site?		**Officer Response CFS65**
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site. Special consideration will need to be given to waste matters given the site's proximity to nearby waste uses. ite CFS65 falls within the Sand and Gravel Belt, and BGS data also identifies potential sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. Site CFS65 is located south of two existing safeguarded waste management facilities namely Waterdale Recycling Centre (RC) and Waste Transfer Station (WTS) (collectively referred to as Waterdale). Waterdale, as mentioned in previous responses, is identified as an Allocated Site (ref: AS041) in the adopted Waste Site Allocations Development Plan Document (DPD) and as such is acceptable in principle for a range of potential waste uses. Waterdale is also identified as an existing Strategic Site in the adopted Waste Core Strategy & Development Management Policies DPD, as the site is essential to the current and future waste management of Local Authority Collected waste in the county.	Comments noted. The LPA will discuss these comments with the developer including the need to assess the potential suitability of mineral extraction (and that the County Council will object to development jeopardising future mineral extraction), opportunistic extraction during construction and the need for a SWMP at planning application stage.

	In line with adopted waste Policy 5: Safeguarding of Sites, the county council will oppose development proposals that are likely to prevent or prejudice the use of land identified or safeguarded for waste management purposes. All District and Borough Council's must apply the NPPF's 'agent of change' principle (paragraph 187) when considering proposals for non-waste related developments which fall within the vicinity of any safeguarded waste management facility. This states that planning decisions on new developments should ensure integration with existing business such that they do not have unreasonable restrictions placed upon them. The National Planning Policy for Waste also states at paragraph 8 that: When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that […] the likely impact of proposed, non-waste related development on existing waste County of opportunity management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities. In response to the District Council's 2021 Regulation 18 consultation on the Preferred Policy Options and Sites for Potential Allocation, the MWPA explained the county council has acquired the parcel of land known as Brookdell Yard and that this parcel of land will be used to expand and improve operations at Waterdale. As the District Council will be aware, the shredding facility now has planning permission (planning reference number: PL/0276/22). In response to the 2021 consultation, the MWPA requested that the separation buffer as referred to in the commentary for site CSF65 should be adjusted so that it takes into consideration the parcel of land at Brookdell Yard. A minimum 100m buffer distance between the nearest dwellings and the boundary of Brookdell Yard must be applied. This results in a reduced area available for housing development to approximately 3 hectares according to our calculations. There are two different site areas given in the Plan (4.2ha in the comments and 3.2ha in the Size(ha) box). It appears that the site area has been revised (down to 3.2 hectares) but this has not been reflected in the comments associated with the allocation. The comments currently state the following about the buffer distance: 'A minimum 100m buffer distance between the nearest dwellings and the boundary of the Waterdale Household Waste Recycling Centre (located to the north) would be required as part of any development, which has reduced the developable area to approximately 4.2ha'. The comments should be revised to read as follows: 'A minimum 100m buffer distance between the nearest dwellings and the boundary of Brookdell Yard (located to the north) would be required as part of any development, which has reduced the developable area to approximately 3.2ha'.	
Q35 & 36 NSS2: Do you agree that the site NSS2 is an appropriate development site?		**Officer Response NSS2**
Yes	[Summary of comments. Full PDF available on request] The site falls within the Sand and Gravel Belt, and BGS data also identifies potential sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted County of opportunity and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planning application stage.

	With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition. For Question 38, It should be noted that the site NSS6a falls adjacent to an area of Historic Landfill (reference: EAHLD35959). The presence of and risk from contaminative materials should be a consideration in any proposal at this site.	
Q37 & 38 NSS6a: Do you agree that the site NSS6a is an appropriate development site?		**Officer Response NSS6a**
Yes	[Summary of comments. Full PDF available on request] The site falls within the Sand and Gravel Belt, and BGS data also identifies potential sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted County of opportunity and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition. For Question 38, It should be noted that the site NSS6a falls adjacent to an area of Historic Landfill (reference: EAHLD35959). The presence of and risk from contaminative materials should be a consideration in any proposal at this site.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planing application stage
Q39 & 40 NSS10: Do you agree that the site NSS10 is an appropriate development site?		**Officer Response NSS10**
Yes	[Summary of comments. Full PDF available on request] Site NSS10 is located on an area of Historic Landfill (reference: EAHLD12879). The presence of and risk from contaminative materials should be a consideration in any proposal at this site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition	Comments noted. The LPA will discuss these comments with the developer including the potential for contaminative materials and the need for a SWMP at planing application stage.
Q41 & 42 ACFS8b: Do you agree that the site ACFS8b is an appropriate development site?		**Officer Response ACFS8b**
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data identifies potential deposits only beneath a small portion of the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planning application stage.
Q43 & 44 H7: Do you agree that the site H7 is an appropriate development site?		**Officer Response H7**

Yes	[Summary of comments. Full PDF available on request] The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planning application stage.
Q45 & 46 CFS16: Do you agree that the site CFS16 is an appropriate development site?		**Officer Response CFS16**
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planing application stage.
Q47 & 48 CW9: Do you agree that the site CW9 is an appropriate development site?		**Officer Response CW9**
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q49 & 50 CFS18c: Do you agree that the site CFS18c is an appropriate development site?		**Officer Response CFS18c**
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planing application stage.
Q51 & 52 ACFS1: Do you agree that the site ACFS1 is an appropriate development site?		**Officer Response ACFS1**
Neutral	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planing application stage.

	minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	
Q53 & 54 NSS23: Do you agree that the site NSS23 is an appropriate development site?		**Officer Response NSS23**
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planing application stage.
Q55 & 56 EOS12.4: Do you agree that the site EOS12.4 is an appropriate development site?		**Officer Response EOS12.4**
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site, but careful consideration must be given to the mineral matters set out below. Should the District Council be minded to continue to include this allocation, the need to assess the potential suitability of mineral extraction and how this requirement will fit in with the site's delivery and it's supporting text (or policy text where appropriate) will need to be considered. Site EOS12.4 is 17.18 hectares and has the potential to accommodate up to 850 dwellings. The site is located entirely within the Sand and Gravel Belt. BGS data also identifies potential superficial sand/gravel deposits beneath the site. Adopted Minerals Local Plan Policy 5: Mineral Sterilisation states: Mineral extraction will be encouraged prior to other development taking place where any significant mineral resource would otherwise be sterilised, or where despoiled land would be improved following restoration. The County Council will object to any development proposals within, or adjacent to areas of potential mineral resource, which would prevent, or prejudice potential future mineral extraction unless it is clearly demonstrated that: i. the land affected does not contain potentially workable mineral deposits; and/or ii. there is an overriding need for the development; and iii. the mineral cannot practically be extracted in advance. County of opportunity In accordance with paragraph 212 of the NPPF development proposals in Mineral Safeguarding Areas that might constrain potential future use for mineral working should not normally be permitted. Given the size of the allocation coupled with the potential for sand and gravel deposits to be present beneath the site, the Minerals Planning Authority would request a site investigation and evaluation by way of a MRA to assess the potential for workable mineral deposits and avoid the possibility of mineral sterilisation. MRAs should be undertaken as early as possible to identify whether prior extraction of sand and gravel will be necessary ahead of developing the site for residential use. If it is identified through the MRA that the prior extraction of sand and gravel is viable at this site, then a separate planning application for mineral extraction will need to be submitted to the Minerals Planning Authority. The District Council is advised to include a requirement on the need for a MRA within the appropriate policy or appropriate section of commentary for this site allocation within the Plan. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP)	The LPA note the amended comments dated 19.02.2024, withdrawing comments for the site needing to undertake a Mineral Resource Assessment (MRA) and the advice that a requirement on the need for a MRA should be included within the appropriate policy or appropriate section of commentary for the site allocation. The LPA will discuss HCC Minerals and Waste's comments with the developer, including the request for a SWMP at a planning application stage.

	prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	
Q57 & 58 MC11: Do you agree that the site MC11 is an appropriate development site?		**Officer Response MC11**
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q59 & 60 EOS 7.0: Do you agree that the site EOS 7.0 is an appropriate development site?		**Officer Response EOS 7.0**
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site, but careful consideration must be given to the mineral matters set out below. Should the District Council be minded to continue to include this allocation, the need to assess the potential suitability of mineral extraction and how this requirement will fit in with the site's delivery and it's supporting text (or policy text where appropriate) will need to be considered. Site EOS7.0 is 20.8 hectares and has the potential to accommodate up to 550 dwellings. The site is located entirely within the Sand and Gravel Belt. BGS data also identifies potential superficial sand/gravel deposits beneath the site. Adopted Minerals Local Plan Policy 5: Mineral Sterilisation states: Mineral extraction will be encouraged prior to other development taking place where any significant mineral resource would otherwise be sterilised, or where despoiled land would be improved following restoration. County of opportunity The County Council will object to any development proposals within, or adjacent to areas of potential mineral resource, which would prevent, or prejudice potential future mineral extraction unless it is clearly demonstrated that: i. the land affected does not contain potentially workable mineral deposits; and/or ii. there is an overriding need for the development; and iii. the mineral cannot practically be extracted in advance. In accordance with paragraph 212 of the NPPF development proposals in Mineral Safeguarding Areas that might constrain potential future use for mineral working should not normally be permitted. Given the size of the allocation coupled with the potential for sand and gravel deposits to be present beneath the site, the Minerals Planning Authority would request a site investigation and evaluation by way of a MRA to assess the potential for workable mineral deposits and avoid the possibility of mineral sterilisation. MRAs should be undertaken as early as possible to identify whether prior extraction of sand and gravel will be necessary ahead of developing the site for residential use. If it is identified through the MRA that the prior extraction of sand and gravel is viable at this site, then a separate planning application for mineral extraction will need to be submitted to the Minerals Planning Authority. The District Council is advised to include a requirement on the need for a MRA within the appropriate policy or appropriate section of commentary for this site allocation within the Plan. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	The LPA note the amended comments dated 19.02.2024, withdrawing comments for the site needing to undertake a Mineral Resource Assessment (MRA) and the advice that a requirement on the need for a MRA should be included within the appropriate policy or appropriate section of commentary for the site allocation. The LPA will discuss HCC Minnerals and Waste's comments with the developer, including the request for a SWMP at a planning application stage.
Q61 & 62 P4a: Do you agree that the site P4a is an appropriate development site?		**Officer Response P4a**
Yes	[Summary of comments. Full PDF available on request]	Comments noted.

	None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	
Q63 & 64: Do you agree that the site P33 is an appropriate development site?		**Officer Response P33**
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q65 & 66: Do you agree that the site P38 is an appropriate development site?		**Officer Response P38**
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q67 & 68: Do you agree that the site P39 is an appropriate development site?		**Officer Response P39**
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q69 & 70: Do you agree that the site RW31 is an appropriate development site?		**Officer Response RW31**
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will County of opportunity reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planning application stage.
Q71 & 72: Do you agree that the site H15 is an appropriate development site?		**Officer Response H15**
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planning application stage.

	County of opportunity reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	
Q73 & 74: Do you agree that the site CFS59 is an appropriate development site?		**Officer Response CFS59**
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planning application stage
Q75 & 76: Do you agree that the site CFS40a is an appropriate development site?		**Officer Response CFS40a**
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.
Q77 & 78: Do you agree that the site H17 is an appropriate development site?		**Officer Response H17**
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.

Q79 & 80: Do you agree that the site H18 is an appropriate development site?		Officer Response H18
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q81 & 82: Do you agree that the site H22a is an appropriate development site?		**Officer Response H22a**
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.
Q83 & 84: Do you agree that the site CFS20 is an appropriate development site?		**Officer Response CFS20**
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the proposed allocation is located near to a safeguarded waste management site (GPG Auto Services – ELV metal recycling facility). Any future proposals on the allocation may need to consider the nearby safeguarded waste management site and the need incorporate measures to avoid adverse amenity conditions for residents and to avoid any restrictions being placed on the existing facility. The county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.
Q85 & 86: Do you agree that the site CG16 is an appropriate development site?		**Officer Response CG16**
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.

Q87 & 88: Do you agree that the site CG47 is an appropriate development site?		Officer Response CG47
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will County of opportunity reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.
Q89 & 90: Do you agree that the site CG65 is an appropriate development site?		**Officer Response CG65**
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site.	Comments noted.
Q91 & 92: Do you agree that the site H9 is an appropriate development site?		**Officer Response H9**
Neutral	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planning application stage.
Q93 & 94: Do you agree that the site CFS61 is an appropriate development site?		**Officer Response CFS61**
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will County of opportunity reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.

Q95 & 96: Do you agree that the site CFS12 is an appropriate development site?		Officer Response CFS12
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the majority of the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.
Q97 & 98: Do you agree that the site AS13 is an appropriate development site?		**Officer Response AS13**
Yes	[Summary of comments. Full PDF available on request] nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q99 & 100: Do you agree that the site AS31 is an appropriate development site?		**Officer Response AS31**
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q101 & 102: Do you agree that the site BR20 is an appropriate development site?		**Officer Response BR20**
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planning application stage.
Q103 & 104: Do you agree that the site PCS16 is an appropriate development site?		**Officer Response PCS16**
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q105 & 106: Do you agree that the site H24 is an appropriate development site?		**Officer Response H24**
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planning application stage.

	Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	
SC_P4_00028_Canal & River Trust		
Q39 & 40: Do you agree that the site NSS10 is an appropriate development site?		**Officer Response NSS10**
Neutral	[Summary of comments. Full PDF available on request] The site does directly adjoin the canal corridor and any development would therefore need to have particular regard to any potential impacts to the canal and include appropriate assessments and mitigation. The detail within the consultation suggests that the site could accommodate up to 20no. units though considering the limited depth of the site it is difficult to see how this quantum of development with associated access road, parking, external amenity spaces etc could successfully be accommodated within the site, even before any potential EA requirement for an 8m buffer strip is factored in. The Trust would require much greater detail to demonstrate how that could be achieved in a way that delivers high quality place making. There are existing trees at the back of the towpath which would need to be retained and proposals for boundary treatment would require careful consideration. Any submission would need to consider shading to the canal corridor and it would also be important to ensure that external areas are designed and laid out appropriately with car parking and bin storage screened from the view of the waterway. As identified in the consultation a Heritage Statement would be required and this should consider the listed Sparrow's Herne Bridge to the south and take into account the fact that the canal corridor, including structures such as the adjacent lock, are non-designated heritage assets. The provision of an area of meaningful open space around the lock and to the south of the site to protect the setting of the listed Sparrow's Herne Bridge may also be required.	Comments noted. The LPA will discuss the Canal and River Trusts comments with the developers. Discussion topics will include: - Concerns about quantum of development and how access road, parking, amenity space, 8m buffer etc would be provided -Trust requires greater detail regarding high quality place making, i.e design and retention of trees -A Heritage Statement should consider the Listed Sparrow's Herne Bridge and non-designated heritage assets such as the adjacent lock -The provision of an area of meaningful open space around the lock and to the south of the site to protect the setting of the listed Sparrow's Herne Bridge may also be required.
Q41 & 42: Do you agree that the site ACFS8b is an appropriate development site?		**Officer Response ACFS8b**
Neutral	[Summary of comments. Full PDF available on request] The site is set back from the canal though it adjoins the Mill Stream which is linked to the canal. Any proposals should therefore consider potential impacts to water quality and provide appropriate landscape screening to soften any wider views of the development from the canal corridor.	Comments noted. The LPA will discuss the Canal and River Trust's comments with the developer, including potential impacts to water quality and the need to provide appropriate landscape screening to soften any wider views of the development from the canal corridor.
Q81 & 82: Do you agree that the site H22a is an appropriate development site?		**Officer Response H22a**
Neutral	[Summary of comments. Full PDF available on request] The site is set back from the canal though the site would appear to be at a higher ground level. Therefore, to mitigate any visual impact and retain the landscaped setting of the canal corridor additional planting to the site boundary should be required. Considering the difference in land levels full drainage details would also be required with any submission.	Comments noted. The LPA will discuss the Canal and River Trust's comments with the developer. Additionally, flood related policies would be applied at the planning application stage. Through Local Plan policy, any development would be required to respond to distinctive local character (including landscape character) and would have to consider a design criteria.
SC_P4_00029_Hertsmere Borough Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852		**Officer Response Housing Numbers**

dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		
Neutral	[Summary of comments. Full PDF available on request] -It is clear that there are several shared characteristics between Three Rivers District Council and Hertsmere Borough Council in terms of settlement pattern and size, and green belt coverage (both around three quarters of the local authority area). Lack of available brownfield land is acknowledged to be a common denominator between the boroughs due to the relatively small settlement sizes and the absence of historic large scale industry in the areas. -Addressing the acute need for housing is vital -Evidence for housing Need - If a local authority is planning to provide significantly less homes than set out in the standard methodology, (42% of the total need in the proposed approach in your preferred option consultation), there needs to be clear and justified reasons why this is the case. - The Green Belt as a constraint to development - concerned that the level of reduction proposed, when compared to both the previous consultation and in particular, the quantum suggested by officers in the report of 24 August 2023 to the Local Plan Sub-Committee has not been clearly justified. Suggest that more robust, technical justification may be needed for the low growth option. -We have reviewed the housing sites proposed and do not have any specific comments. We do not consider any to be close enough to our centres of population or large enough to impact directly on our infrastructure. However, we will want to continue working with you on areas of cross boundary interest, including strategic infrastructure requirements. In the absence of more robust justification for the approach being taken, we have concerns that the removal of a number of strategic sites from the plan moving forward will be problematic in terms of the soundness of the plan.	It is acknowledged that there are shared characteristics between the borough of Hertsmere and Three Rivers District, including similar levels of Green Belt. It is considered that the standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target. Paragraph 11 of the NPPF states that "strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needsthat cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area". Footnote 7 of the NPPF states "The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty ....". As set out in Footnote 7, land designated as Green Belt is listed as a reason as to why the scale, type and distribution of development within the plan area may be restricted. The LPA will continue to undertake discussions with neighbouring authorities such as Hertsmere as part of its Duty to Co-operate.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		**Officer Response Low Growth Option**
Neutral	[Summary of comments. Full PDF available on request] -It is clear that there are several shared characteristics between Three Rivers District Council and Hertsmere Borough Council in terms of settlement pattern and size, and green belt coverage (both around three quarters of the local authority area). Lack of available brownfield land is acknowledged to be a common denominator between the	It is considered that the standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental,

	boroughs due to the relatively small settlement sizes and the absence of historic large scale industry in the areas. -Addressing the acute need for housing is vital -Evidence for housing Need - If a local authority is planning to provide significantly less homes than set out in the standard methodology, (42% of the total need in the proposed approach in your preferred option consultation), there needs to be clear and justified reasons why this is the case. - The Green Belt as a constraint to development - concerned that the level of reduction proposed, when compared to both the previous consultation and in particular, the quantum suggested by officers in the report of 24 August 2023 to the Local Plan Sub-Committee has not been clearly justified. Suggest that more robust, technical justification may be needed for the low growth option. -We have reviewed the housing sites proposed and do not have any specific comments. We do not consider any to be close enough to our centres of population or large enough to impact directly on our infrastructure. However, we will want to continue working with you on areas of cross boundary interest, including strategic infrastructure requirements. In the absence of more robust justification for the approach being taken, we have concerns that the removal of a number of strategic sites from the plan moving forward will be problematic in terms of the soundness of the plan.	infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target. Paragraph 11 of the NPPF states that "strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needsthat cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area". Footnote 7 of the NPPF states "The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty ....". As set out in Footnote 7, land designated as Green Belt is listed as a reason as to why the scale, type and distribution of development within the plan area may be restricted. The LPA will continue to undertake discussions with neighbouring authorities such as Hertsmere as part of its Duty to Co-operate.
General Comments		**Officer Response General Comments**
	[Summary of comments. Full PDF available on request] We recognise that there are challenges in justifying such a housing figure which deviates so much from the standard method. However, such a deviation has the potential to impact on neighbouring authorities within the same housing market area. In the absence of more robust justification for the approach being taken, we have concerns that the removal of a number of strategic sites from the plan moving forward will be problematic in terms of the soundness of the plan.	Comments noted. The LPA will continue to undertake discussions with neighbouring Local Authorities such as Hertsmere Borough Council as part of its Duty to Co-operate.
SC_P4_00031_Natural England		
Q7 & 8: Do you agree that the site AB18 is an appropriate development site?		**Officer Response AB18**
Neutral	[Summary of comments. Full PDF available on request] The following allocations are located within the proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns AONB: - AB18 - NSS2 - NSS6a - NSS10	Comments Noted.

	- CFS59 Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas.	
Q23 & 24: Do you agree that the site NSS14 is an appropriate development site?		**Officer Response NSS14**
Neutral	[Summary of comments. Full PDF available on request] Two proposed allocations (NSS14 and NSS2) either have ancient woodland within their red line boundary or are close to ancient woodland so have the potential to adversely impact ancient woodland, in particular through recreational pressure. You should consider site specific policies requiring alternative natural greenspaces (ANGs) to mitigate for potential recreational effects on affected ancient woodland.	Comments noted. The LPA will discuss Natural England's comments with the developer.
Q29 & 30: Do you agree that the site CFS6 is an appropriate development site?		**Officer Response CFS6**
Neutral	[Summary of comments. Full PDF available on request] The site is within the zone of influence for Chilterns Beechwoods Special Area of Conservation (SAC). For larger developments that fall within the ZOI and result in a net increase of more than 100 dwellings we recommend further consultation with Natural England to determine the recreational impacts and any requirement for mitigation measures. 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).	Comments noted. The LPA will discuss Natural England's comments with the developer, as well as likely undertake further discussions with Natural England.
Q31 & 32: Do you agree that the site PCS21 is an appropriate development site?		**Officer Response PCS21**
Neutral	[Summary of comments. Full PDF available on request] The site is within the zone of influence for Chilterns Beechwoods Special Area of Conservation (SAC). For larger developments that fall within the ZOI and result in a net increase of more than 100 dwellings we recommend further consultation with Natural England to determine the recreational impacts and any requirement for mitigation measures. 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).	Comments noted. The LPA will discsuss Natural England's comments with the developer, as well as likely undertake further discussions with Natural England.
Q33 & 34: Do you agree that the site CFS65 is an appropriate development site?		**Officer Response CFS65**
Neutral	[Summary of comments. Full PDF available on request] Our review of the additional allocations submitted indicates that at least five of these allocations, namely CFS65: Land north of Bucknalls Lane; EOS12.4: Land west and south of Maple Cross; CFS40a: Land at Park Road; CFS20: Land at Croxley Station Watford Road and CFS61: Cinnamond House Cassiobridge appear to trigger NEs SSSI Impact Risk Zones for residential development (please refer to previous consultation responses for further details). Such developments could impact Bricket wood common SSSI; Mid Colne Valley SSSI; and Croxley common moor SSSI and are likely to require consultation with Natural England. However, we expect all allocations to identify opportunities to contribute towards delivering the Nature Recovery Network by environmental enhancement, including Biodiversity Net Gain, secured through robust Plan policies.	Comments noted. The LPA will discuss Natural England's comments with the developer and undertake further discussions with Natural England where necessary.
Q35 & 36: Do you agree that the site NSS2 is an appropriate development site?		**Officer Response NSS2**
Neutral	[Summary of comments. Full PDF available on request] The following allocations are located within the proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns AONB:	Comments noted. The LPA will discuss Natural England's comments with the developer.

	- AB18 - NSS2 - NSS6a - NSS10 - CFS59 Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas. Two proposed allocations (NSS14 and NSS2) either have ancient woodland within their red line boundary or are close to ancient woodland so have the potential to adversely impact ancient woodland, in particular through recreational pressure. You should consider site specific policies requiring alternative natural greenspaces (ANGs) to mitigate for potential recreational effects on affected ancient woodland.	
Q37 & 38: Do you agree that the site NSS6a is an appropriate development site?		**Officer Response NSS6a**
Neutral	[Summary of comments. Full PDF available on request] The following allocations are located within the proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns AONB: - AB18 - NSS2 - NSS6a - NSS10 - CFS59 Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas.	Comments noted.
Q39 & 40: Do you agree that the site NSS10 is an appropriate development site?		**Officer Response NSS10**
Neutral	[Summary of comments. Full PDF available on request] The following allocations are located within the proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns AONB: - AB18 - NSS2 - NSS6a - NSS10 - CFS59 Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas.	Comments noted.
Q55 & 56: Do you agree that the site EOS12.4 is an appropriate development site?		**Officer Response EOS12.4**

Neutral	[Summary of comments. Full PDF available on request] EOS12.4: Land west and south of Maple Cross appear to trigger NEs SSSI Impact Risk Zones for residential development (please refer to previous consultation responses for further details). Such developments could impact Mid Colne Valley SSSI and are likely to require consultation with Natural England. However, we expect all allocations to identify opportunities to contribute towards delivering the Nature Recovery Network by environmental enhancement, including Biodiversity Net Gain, secured through robust Plan policies. The Chilterns Area of Outstanding Natural Beauty (AONB) is referenced within the Sustainability Appraisal Note submitted alongside Part 4 of the Reg 18 consultation. Several allocations fall within the AONB, namely: ACFS1; NSS23; EOS12.4; EOS7.0; CFS59; CFS40a; H22a; CFS20; and CFS61. We would expect to see a policy that requires assessment of development applications to ascertain whether the proposed development would have a significant impact on or harm that statutory purpose.	Comments noted. The LPA will discuss Natural England's comments with the developer, including potential impact of development on SSSI's and AONB's. The LPA will undertake further discussions with Natural England where necessary.
Q73 & 74: Do you agree that the site CFS59 is an appropriate development site?		**Officer Response CFS59**
Neutral	[Summary of comments. Full PDF available on request] The following allocations are located within the proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns AONB: - AB18 - NSS2 - NSS6a - NSS10 - CFS59 Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas. Our review of the additional allocations submitted indicates that at least five of these allocations, namely CFS65: Land north of Bucknalls Lane; EOS12.4: Land west and south of Maple Cross; CFS40a: Land at Park Road; CFS20: Land at Croxley Station Watford Road and CFS61: Cinnamond House Cassiobridge appear to trigger NEs SSSI Impact Risk Zones for residential development (please refer to previous consultation responses for further details). Such developments could impact Bricket wood common SSSI; Mid Colne Valley SSSI; and Croxley common moor SSSI and are likely to require consultation with Natural England. However, we expect all allocations to identify opportunities to contribute towards delivering the Nature Recovery Network by environmental enhancement, including Biodiversity Net Gain, secured through robust Plan policies.	Comments noted. The LPA will discuss Natural England's comments with the developer and undertake further discussions with Natural England where necessary.
Q83 & 84: Do you agree that the site CFS20 is an appropriate development site?		**Officer Response CFS20**
Neutral	[Summary of comments. Full PDF available on request] Our review of the additional allocations submitted indicates that at least five of these allocations, namely CFS65: Land north of Bucknalls Lane; EOS12.4: Land west and south of Maple Cross; CFS40a: Land at Park Road; CFS20: Land at Croxley Station Watford Road and CFS61: Cinnamond House Cassiobridge appear to trigger NEs SSSI Impact Risk Zones for residential development (please refer to previous consultation responses for further details). Such developments could impact Bricket wood common SSSI; Mid Colne Valley SSSI; and Croxley common moor SSSI and are likely to require consultation with Natural England. However, we expect all allocations to identify opportunities to contribute towards delivering the Nature	Comments noted. The LPA will discuss Natural England's comments with the developer and undertake further discussions with Natural England where necessary.

	Recovery Network by environmental enhancement, including Biodiversity Net Gain, secured through robust Plan policies.	
Q93 & 94: Do you agree that the site CFS61 is an appropriate development site?		**Officer Response CFS61**
Neutral	[Summary of comments. Full PDF available on request] Our review of the additional allocations submitted indicates that at least five of these allocations, namely CFS65: Land north of Bucknalls Lane; EOS12.4: Land west and south of Maple Cross; CFS40a: Land at Park Road; CFS20: Land at Croxley Station Watford Road and CFS61: Cinnamond House Cassiobridge appear to trigger NEs SSSI Impact Risk Zones for residential development (please refer to previous consultation responses for further details). Such developments could impact Bricket wood common SSSI; Mid Colne Valley SSSI; and Croxley common moor SSSI and are likely to require consultation with Natural England. However, we expect all allocations to identify opportunities to contribute towards delivering the Nature Recovery Network by environmental enhancement, including Biodiversity Net Gain, secured through robust Plan policies.	Comments noted. The LPA will discuss Natural England's comments with the developer and undertake further discussions with Natural England where necessary.
General Comments		**Officer Response General Comments**
	[Full PDF available on request]	The LPA will continue to undertake discussions with relevant bodies such as Natural England as part of its Duty to Co-operate.
SC_P4_00032_Harrow Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Yes	[Summary of comments. Full PDF available on request] The current Part 4 Regulation 18 with the lower growth option, has removed a number of Green Belt sites that were previously proposed to be de-designated from Green Belt. The Council welcome the revised approach.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		**Officer Response Sites not taken forward**
Yes	[Summary of comments. Full PDF available on request] The current Part 4 Regulation 18 with the lower growth option, has removed a number of Green Belt sites that were previously proposed to be de-designated from Green Belt. The Council welcome the revised approach, and specifically the removal of site PCS47 as a site sought to be released as set out in Appendix 1 – Sites not proposed for development by TRDC (Page 11)	Comments noted.
SC_P4_00034_National Highways		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for		**Officer Response Housing Numbers**

calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		
Neutral	[Summary of comments. Full PDF available on request] As is customary where housing numbers for a local plan are proposed, National Highways remains impartial, leaving the planning authority to argue its case. The housing numbers will be considered as part of the overall soundness of the plan by the planning inspector following or during the local plan examination in public.	Comments noted.
Q23 & 24: Do you agree that the site NSS14 is an appropriate development site?		**Officer Response NSS14**
Neutral	[Summary of comments. Full PDF available on request] Two proposed allocations (NSS14 and NSS2) either have ancient woodland within their red line boundary or are close to ancient woodland so have the potential to adversely impact ancient woodland, in particular through recreational pressure. You should consider site specific policies requiring alternative natural greenspaces (ANGs) to mitigate for potential recreational effects on affected ancient woodland.	Comments noted. The LPA will discuss Natural England's comments with the developer.
Q27 & 28: Do you agree that the site CFS3 is an appropriate development site?		**Officer Response CFS3**
Neutral	[Summary of comments. Full PDF available on request] Looking at the proposed development sites across the district, for subsequent planning applications National Highways would also require individual transport assessments alongside reviews of sustainability and net zero proposals covering the larger sites as follows:	Comments noted. The LPA will discuss National Highways' comments with the developer.
Q33 & 34: Do you agree that the site CFS65 is an appropriate development site?		**Officer Response CFS65**
Neutral	[Summary of comments. Full PDF available on request] Looking at the proposed development sites across the district, for subsequent planning applications National Highways would also require individual transport assessments alongside reviews of sustainability and net zero proposals covering the larger sites as follows:	Comments noted. The LPA will discuss with the developer that a planning application stage, individual transport assessments alongside reviews of sustainability and net zero proposals would be required at this site.
Q45 & 46: Do you agree that the site CFS16 is an appropriate development site?		**Officer Response CFS16**
Neutral	[Summary of comments. Full PDF available on request] Looking at the proposed development sites across the district, for subsequent planning applications National Highways would also require individual transport assessments alongside reviews of sustainability and net zero proposals covering the larger sites as follows:	Comments noted. The LPA will discuss National Highways' comments with the developer.
Q55 & 56: Do you agree that the site EOS12.4 is an appropriate development site?		**Officer Response EOS12.4**
Neutral	[Summary of comments. Full PDF available on request] Looking at the proposed development sites across the district, for subsequent planning applications National Highways would also require individual transport assessments alongside reviews of sustainability and net zero proposals covering the larger sites.	Comments noted. The LPA will discuss National Highways' comments with the developer.
Q59 & 60: Do you agree that the site EOS7.0 is an appropriate development site?		**Officer Response EOS7.0**
Neutral	[Summary of comments. Full PDF available on request] Looking at the proposed development sites across the district, for subsequent planning applications National Highways would also require individual transport assessments alongside reviews of sustainability and net zero proposals covering the larger sites as follows:	Comments noted. The LPA will discuss National Highways' comments with the developer.
General Comments		**Officer Response General Comments**

	[Summary of comments. Full PDF available on request] We look forward to continuing to participate in future consultations and discussions.	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as National Highways as part of its Duty to Co-operate.
SC_P4_00036_Nash Mills Parish Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Yes	[Summary of comments. Full PDF available on request] NMPC commend Three Rivers for considering the impact on our precious green spaces and working to protect them from high harm.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		**Officer Response Low Growth Option**
Yes	[Summary of comments. Full PDF available on request] NMPC commend Three Rivers for considering the impact on our precious green spaces and working to protect them from high harm.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review
SC_P4_00007_Sport England		
Q33 & 34: Do you agree that the site CFS65 is an appropriate development site?		**Officer Response CFS65**
No	No objection is made to the principle of the loss of the former Penfold Park Golf Club that closed in 2016. This is because golf facility needs were assessed as part of the Council's Playing Pitch Strategy (2019) and concluded that the current supply of golf facilities in Three Rivers district (excluding Penfold Park) can meet current and future demand without this golf course being brought back into use. However, the strategy's action plan (page 58 of the Playing Pitch Strategy & Action Plan), included a site specific recommended action to mitigate the loss of the site through firstly seeking to enhance the golfing offer in the district or by creating an alternative non-traditional golf provision or	Comments noted. The LPA will discuss the site specific srategy within the Playing Pitch Strategy with the developer as well as the potential developer contributions which may be required

	secondly using developer contributions to improve other playing pitch sites. Given that the Council's Playing Pitch Strategy's forms part of the evidence base for the Local Plan and that the potential allocation of this site would need to demonstrate compliance with paragraph 97 of the NPPF in relation to the loss of sports facility provision, if this site is allocated for residential, the site specific requirements should incorporate the recommendations in the strategy relating to including proposals for mitigating the loss of the former golf course. Without this, the allocation of this site would not be considered to accord with Government policy in the NPPF and would not therefore meet the 'justified' and 'consistent with national policy' tests of soundness. Sport England would be willing to provide advice to the Council and the site promoter on the approach to developing mitigation proposals upon request.	
SC_P4_00013_Denham Parish Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Yes	Smaller quantum of green belt release	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		**Officer Response Low Growth Option**
Yes	Less traffic generation that will impact on neighbouring councils areas	Comments noted. Representations from the Hertfordshire Highways Authority will be taken in to consideration. The Transport Assessment will identify mitigation measures required and any identified measures will be included in the Infrastructure Delivery Plan.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		**Officer Response Sites not taken forward**
Yes	Less impact on neighbouring councils area.	Comments noted.
Q55 & 56: Do you agree that the site EOS12.4 is an appropriate development site?		**Officer Response EOS12.4**
No	Denham Parish Council has concerns about the increased traffic movements that would result in a development of 850 dwellings and the potential increase of traffic through the Denham Parish area. The infrastructure detailed above should be progressed at the earliest opportunity, along with suitable road layout to remediate traffic	Comments noted. With regards to concerns relating to congestion, traffic and highway safety, representations from the Hertfordshire Highways

	congestion during peak times. As the site is located close to the M25, suggest an AQMA study to view the likely impact arising from this development.	Authority and any other relevant bodies will be taken into consideration.
Q59 & 60: Do you agree that the site EOS7.0 is an appropriate development site?		**Officer Response EOS7.0**
No	Denham Parish Council has concerns about the increased traffic movements that would result in a development of 850 dwellings and the potential increase of traffic through the Denham Parish area. The infrastructure detailed above should be progressed at the earliest opportunity, along with suitable road layout to remediate traffic congestion during peak times. As the site is located close to the M25, suggest an AQMA study to view the likely impact arising from this development.	Comments noted. With regards to concerns relating to congestion, traffic and highway safety, representations from the Hertfordshire Highways Authority and any other relevant bodies will be taken into consideration.
SC_P4_00017_Chalfont St Peter Parish Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Yes	The Green Belt is extremely important to our area and it's important that we protect our Green Belt Areas on behalf of our residents.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		**Officer Response Low Growth Option**
Yes	This strategy will result in less use of our Green Belt Areas.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		**Officer Response Sites not taken forward**
Yes	no comments	Comments noted.
Q55 & 56: Do you agree that the site EOS12.4 is an appropriate development site?		**Officer Response EOS12.4**

No	Horn Hill Road is an important access Road from Chalfont St Peter to A412/ North Orbital for access to Watford/ Rickmansworth, etc This Green Belt land separates Chalfont St Peter and Maple Cross, it is also the county border between Buckinghamshire and Hertfordshire. Our comment is purely on the IOS 12.4 which affects Chalfont St Peter accesses. We believe it is not sustainable as it does not have the required facilities at present which will be required to achieve sustainability.	Comments noted. With regards to concerns relating to congestion, highway safety, access to the site and sustainability, representations from the Hertfordshire Highways Authority and other relevant bodies will be taken into consideration.
SC_P4_00011_Watford Rural Parish Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		**Officer Response Housing Numbers**
Yes	Green Belt must be protected to ensure the following: Preservation of Natural Environment: Green belt areas often host unique ecosystems, flora, and fauna that require protection. They serve as important habitats for wildlife and contribute to biodiversity conservation. Maintaining Open Spaces: Green belt areas offer crucial open spaces for recreational activities, enhancing the quality of life for residents. These spaces contribute to mental and physical well-being, providing areas for leisure, exercise, and relaxation. Flood Risk Mitigation: Green belt land can play a role in natural flood management, absorbing excess water and reducing flood risk for nearby areas. Development can disrupt natural drainage systems and exacerbate flooding. Visual and Cultural Significance: Green belt areas often have scenic beauty and cultural significance, contributing to the local identity and heritage. Development can compromise these landscapes, impacting the visual appeal and historical value. Urban Sprawl Control: Green belt policies help contain urban sprawl, preventing cities from merging into one another and maintaining distinct community identities. Encouraging development on green belt land can lead to unchecked urban expansion and loss of rural character. Agricultural Importance: Some green belt areas may have agricultural value, supporting local food production and sustainable farming practices. Developing these areas can lead to the loss of fertile land, affecting local food sources. Traffic and Infrastructure Strain: Introducing developments in green belt areas can strain existing infrastructure, leading to increased traffic congestion and demands on services like schools and healthcare. Long-Term Impact on Environment: Developing green belt areas contributes to habitat fragmentation and loss, impacting the long-term health of ecosystems and natural resources. Policy Protection and Planning: Green belt policies are in place to ensure sustainable development and thoughtful urban planning, aiming to balance growth with environmental conservation. Violating these policies can set precedents that weaken environmental protections in the area. Alternatives and Brownfield Sites:	Comments noted. The preservation of green belt is important for a variety of reasons. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review.

	Consideration should always be given to alternatives, such as brownfield sites or repurposing existing structures, before encroaching on green belt areas. Preserving green belt land in the Three Rivers District Council area is crucial for maintaining a sustainable, balanced environment that benefits both current and future generations.	
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		**Officer Response Low Growth Option**
Yes	Environmental Conservation: Low growth and green belt restraint prioritize the preservation of natural habitats, biodiversity, and ecosystems, minimizing the environmental impact of development. Sustainable Development: It encourages a more sustainable approach to urban planning, focusing on efficient land use and reducing the carbon footprint associated with extensive construction and infrastructure. Resource Optimization: By redeveloping existing urban areas and repurposing brownfield sites instead of encroaching on green belt land, it optimizes the use of available resources and infrastructure. Preserving Scenic and Recreational Spaces: Restraining development on green belt areas ensures that open spaces for recreation, leisure, and natural beauty are preserved for community well-being. Fostering Community Identity: It helps maintain distinct community identities by preventing excessive urban sprawl and preserving the unique characteristics of towns and villages. Infrastructure Efficiency: Focusing growth within existing urban areas allows for better utilization of infrastructure, reducing the need for costly expansion and maintenance of new infrastructure. Economic Benefits: Redeveloping existing areas can lead to economic revitalization, attracting investment and fostering vibrant communities without sacrificing green spaces. Long-Term Sustainability: A low-growth strategy, when combined with green belt restraint, promotes a more balanced and sustainable approach to development that considers the long-term impacts on the environment and quality of life. Policy Consistency and Stability: Following green belt restraints and advocating a low-growth strategy ensures consistency with existing policies, maintaining stability in land-use planning and environmental protections. Encouraging Innovation and Creativity: Limiting expansion into green belt areas encourages innovative approaches to redevelopment, such as adaptive reuse of existing structures or implementing green infrastructure solutions. In essence, a low-growth strategy paired with green belt restraint supports the principles of sustainable development, responsible land use, and environmental conservation while fostering thriving and resilient communities.	Comments noted. The preservation of green belt is important for a variety of reasons. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		**Officer Response Sites not taken forward**

Yes	The large sites located within Carpenders Parks green belt would have 1) enabled urban spread, 2) damaged the local ecology and 3) created numerous traffic issues. The site along Hampermill Lane would have created points 2 & 3, so WRPC welcome their removal.	Comments noted.
Q95 & 96: Do you agree that the site CFS12 is an appropriate development site?		**Officer Response CFS12**
Yes	Its a yes, with the obvious caveats. The redevelopment must take into account all the reasons given by TRDC planning officers in their decision made for 11/0392/FUL. In addition, to pay particular care to learning from the lessons caused by the South Oxhey Central development by not allowing sufficient parking spaces for residents and office workers. Particular care must also be taken to protect the biodiversity of the stream located on this land.	Comments noted. It is noted that application 11/0392/FUL was refused. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. With regards to wildlife and habitat, the legal requirement for a 10% net gain in biodiversity would be applied at the planning application stage. Policies provide for the retention of trees and hedgerows where possible and replanting, as well as other wildlife related policy. The Environment Agency and other relevant body's representations will be taken into consideration.
Q97 & 98: Do you agree that the site AS13 is an appropriate development site?		**Officer Response AS13**
No	Where will the garage users park? Loss of parking just leads to more disharmony and potential ASB. The surrounding roads all have to park on the pavement already and cause the highway to be blocked for wheelchair users and mothers with pushchairs as well as causing issues with parking on junction corners. Loss of privacy and light will also be a factor for those houses backing onto the site. Narrow entrance will not allowed two vehicles to pass each other. Potential issues with emergency vehicles and waste lorries also.	Comments noted. Whilst it is noted that the allocation of the site would result in the loss of the garages, as set out in the Council's Local Housing Needs assessment there is a pressing need within the district for housing. The Regulation 18 consultation document states that the Council "will seek to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land". The allocation of garage sites aligns with this approach. Additionally, with regards to access and highway safety concerns, representations from the Hertfordshire Highways Authority will be taken into consideration. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. Development would be required to satisfy a Design Criteria so that the need for privacy for new and existing residential properties meet an acceptable standard and that overlooking is prevented.

Q99 & 100: Do you agree that the site AS31 is an appropriate development site?		Officer Response AS31
No	Loss of parking and the need for residents parking will only increase the current issues being faced due to the lack of parking caused by the nearby redevelopment. We really object to this site due to its locality. The Office of National Statistics states that, at the end of 2018, 78% of households have a car and the average number of cars per household is 1.4. .” A recent survey undertaken by WRPC clearly show that Phase 1 car ownership is not meeting the expected numbers of cars. 4% of households indicated having no cars in the household. 56% of households had one car and the remaining 40% had 2 cars an equivalent of 1.48 cars per household. The development has put forward a figure of 0.69 spaces which currently equates to 354 spaces for the original planned number or 455 for the additional units proposed. If we take the numbers recorded in our consultation survey (on Henbury Way Car park), then we are looking at 975 spaces being required for the whole development, including the additional units. This means therefore, that the roads in South Oxhey near to the redevelopment require a staggering 520 possible after TRDC allowed the extra units to be built for phase 3. We must prevent any more issues by another development here. Loss of privacy and light will also be a factor for those houses backing onto the site. The very Narrow entrance will not allowed two vehicles to pass each other. Potential issues with emergency vehicles and waste lorries also as it is so narrow they cannot get down the existing entrance. Due to the houses either side, this cannot be widened.	Comments noted. Whilst it is noted that the allocation of the site would result in the loss of the garages, as set out in the Council’s Local Housing Needs assessment there is a pressing need within the district for housing. The Regulation 18 consultation document states that the Council “will seek to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land”. The allocation of garage sites aligns with this approach. Additionally, with regards to access and highway safety concerns, representations from the Hertfordshire Highways Authority will be taken into consideration. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety.
Q101 & 102: Do you agree that the site BR20 is an appropriate development site?		**Officer Response BR20**
Yes	Brownfield site, containing a dilapidated building. A replacement day care centre is being built nearby. However, we would ask that sufficient parking, or even over allocation of Council policy on parking spaces, is considered here to prevent any safety issues with dangerous or over parking on the street which could cause harm to the schoolchildren of Oxhey Wood School.	Comments noted. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. Additionally, representations from Herts Highways will be taken into consideration.
Q103 & 104: Do you agree that the site PCS16 is an appropriate development site?		**Officer Response PCS16**
No	Taken from our objection to 19/1961/FUL DM1 of the Development Management Policies document states The Council will protect the character and residential amenity of existing areas of housing from forms of “backland”, “infill” or other forms of new residential development which are inappropriate for the area – This is clearly an infill project. We believe that this proposed plan fails under policy DM1 a) v). This type of infill development does not maintain the character of the area with different more narrow design. Under Appendix 2 5. New Development iii) it states that a development must “Respect the character of the street scene, particularly with regard to the spacing of properties, roof form, positioning and style of windows and doors, and materials.” This does not follow as it clearly is out of context to the rest of the areas property uniformity. We believe that this proposed plan fails under policy CP12 c) of the Local Development Framework – Core Strategy Document. Concerns have been raised by neighbours regarding the blocking out of light that they have always had.	Comments noted. It is acknowledged that previous applications at the site were refused by the LPA (however, the red line of these applications are different to the proposed site allocation). Through Local Plan policy, any development would be required to respond to distinctive local character (including landscape character) and would have to consider a design criteria. Additionally, policies relating to the protection and preservation of Heritage Assets such as conservation areas would be applied.

	We note and echo the concerns of the public comment where it states that any extra parking along this road will exacerbate the parking issues which currently exist there. Parking is at a premium and adding to this will cause locals difficulty, especially near a main road. This could cause danger to pedestrians which could fall foul of which then causes failures under CP10 (I) of the TRDC's Local Development Framework - Core Strategy Document where it states that a development must make "adequate provision for all users, including car and other vehicle parking, giving priority to people with mobility difficulties, pedestrians, cyclists and equestrians" Councillors recently went on a walk around the playing fields in relation to the Green Space plan being undertaken. Whilst on this walk, rangers showed a badger set which is located near the vicinity. This application may fall foul of the Protection of Badgers Act 1982 specifically offences under section 3. Further, TRDC did not agree to a similar development 06/0490/FUL for the following reasons: The proposed layout would be unsatisfactory in that it would result in a cramped form of development which would not respect the extensive gardens which characterise the Oxhey Hall Estate. As such the proposal would adversely affect the character of the locality, contrary to Policies H14 and GEN3 and Appendix 2 of the Three Rivers Local Plan 1996-2011. It has not been demonstrated that adequate protection could be provided for protected trees on the site, particularly the large mature Oak (T1) close to 44 Vivian Gardens, as proposals, including areas of hardstanding, remain within the recommended root protection areas defined in BS:5837 (2005). Construction is likely to result in damage to trees, contrary to Policies N15 and N16 of the Three Rivers Local Plan 1996-2011.	At a planning application stage, development would be required to satisfy a Design Criteria so that the need for privacy for new and existing residential properties meet an acceptable standard and that overlooking is prevented as well as preventing unacceptable levels of loss of light. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. With regards to wildlife and habitat, the legal requirement for a 10% net gain in biodiversity would be applied at the planning application stage. Policies provide for the retention of trees and hedgerows where possible and replanting, as well as other wildlife related policy. Additionally, policies relating to protected trees would be applied at the planning application stage.
Q105 & 106: Do you agree that the site H24 is an appropriate development site?		**Officer Response H24**
Yes	The plot is not used and we agreed for it to be developed in our letter to Planning relating to 22/1342/OUT application.	Comments noted.
General Comments		**Officer Response General Comments**
	However, WRPC would like to stress how important a detailed infrastructure delivery plan is to any future planning (as TRDC did previously in March 2012). It contains detailed requirements across all Partnerships, such as Heathcare, Police, Housing, Fire etc and we hope that one will be produced alongside this, or certainly when the CIL is updated.	Comments noted. Infrastructure requirements will be identified in the Infrastructure Delivery Plan.

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Employment

1.1 In order to maintain and improve the economic performance of the District, it is important to make provision for future employment and economic development alongside housing growth and protection of the environment. Economic development includes development within the office uses, industry and warehousing uses, public and community uses, leisure and tourism uses and main town centre uses. It also includes any other development which provides employment opportunities, generates wealth or produces or generates an economic output or product.

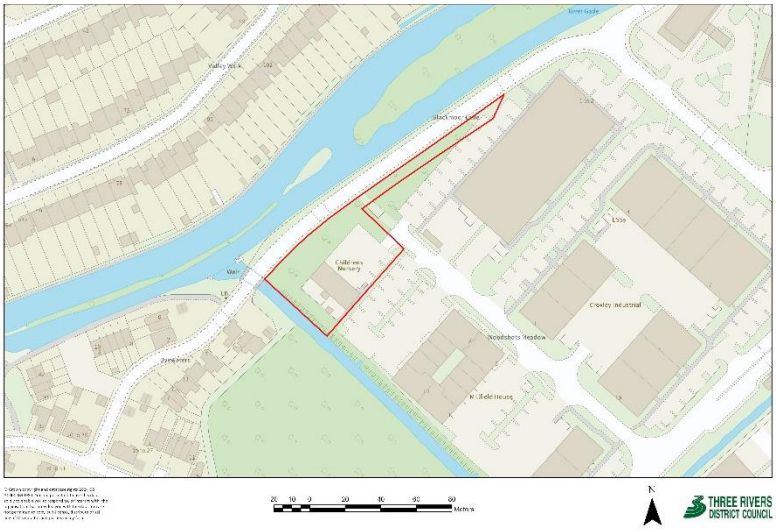
1.2 The South West Herts Economic Study (2024) has been used to inform the requirements for land or floorspace for economic development over the plan period. This report provides an update to the South West Herts Economic Study (2019). The need for this update was identified as a result of the Covid pandemic in 2020-21 which had a significant impact on the economy and commercial property market in the region. The Study recognises the important role of the existing employment centres which are protected through an Article 4 Direction. It does not identify need for new office space during the Plan period and any demand forthcoming is expected to be met by existing employment centres such as Croxley Park. Therefore, there is a need to safeguard existing employment allocations and to allocate further land to meet future need for employment floorspace.

1.3 In terms of industrial and warehousing space there is a total requirement for 622,400 sqm for Hertfordshire which will need to be planned for across the period. Meeting this need would require over 155 ha of land, however most of that need can be met outside Three Rivers. The spare capacity in the existing employment allocations Maple Cross/Maple Lodge employment site allocation (Site E(d) in the Site Allocations LDD) has now been committed (21/0573/FUL). This leaves a need of between two and three hectares of industrial and warehousing land to be planned for allocation.

1.4 Preferred Policy Option 7 in Part 1 of the local plan document seeks to safeguard allocated employment sites for business, industrial and storage or distribution uses whilst also focusing new employment provision on allocated employment sites through intensification and expansion where appropriate.

1.5 The potential employment allocations which are shown below would meet the requirements for office space over the plan period when combined with existing commitments at Croxley Park and Maple Cross/Maple Lodge. A further 2ha to 3ha industrial and warehousing space will need to be allocated in addition the potential allocations below.

Potential Employment Allocations

Site Ref.	CFS70a	Site	Croxley Business Park, Hatters Lane, Croxley Green	Size (ha):	0.4
				**Current Use**	Overflow car park (serving employment area)
				Proposed Use	Storage and distribution uses and office uses
				Green Belt	Yes. If allocated, the Green Belt boundary would have to be revised.

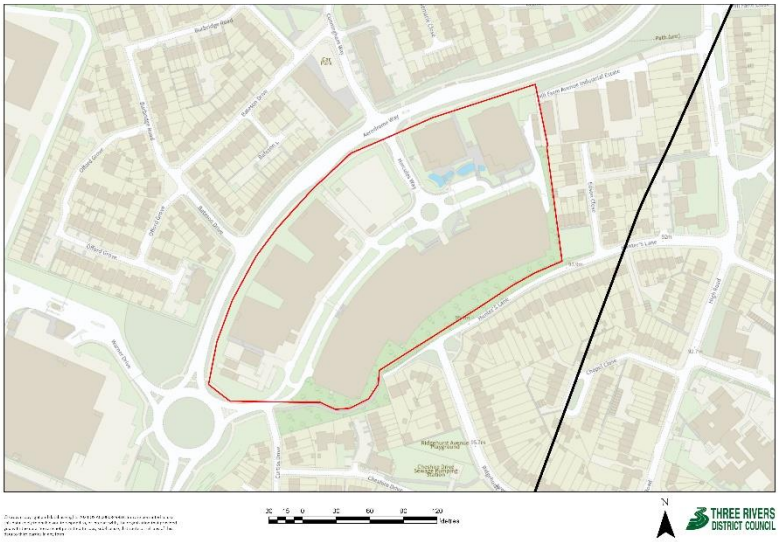
Comments

The site is proposed as an extension to the existing employment site allocation (Croxley Business Park, Site E(a) in the Site Allocations LDD [adopted 2014]). The site has an existing outline permission for the construction of a storage and distribution building (18/0820/OUT). An 8 metre buffer distance between the main river (adjacent to the western boundary) and any development would be required and no development will be permitted on the area of the site in Flood Zone 3. Development would need to provide suitable mitigation to address surface water flood risk and groundwater flood risk on areas of the site as well as taking account of protected trees on/adjacent to the site. The site is in Groundwater Source Protection Zone 1; 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.

Site Ref.	CFS70b	Site	Croxley Business Park, Hatters Lane, Croxley Green	Size (ha):	0.4
				Current Use	Grassland, compost area, hardstanding
				Proposed Use	Ancillary space to Croxley Green Business Park
				Green Belt	Yes. If allocated, the Green Belt boundary would have to be revised.

Comments

The site is proposed as an extension to the existing employment site allocation (Croxley Business Park, Site E(a) in the Site Allocations LDD [adopted 2014]). The site has an existing permission for leisure use to support Croxley Business Park (18/1415/FUL). An 8 metre buffer distance between the main river (adjacent to the eastern boundary) and any development would be required and no development will be permitted on the area of the site in Flood Zone 3b. Development would need to provide suitable mitigation to address surface water flood risk and groundwater flood risk impacting the site. The site is adjacent to a Site of Special Scientific Interest and Local Nature Reserve (Croxley Common Moor) and measures to avoid adverse impacts and enhance biodiversity would need to be provided. The site is in Groundwater Source Protection Zone 1; 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.

Site Ref.	E(f)	Site	Leavesden Park	Size (ha):	5.3
				**Current Use**	Offices
				Proposed Use	Offices
				Green Belt	No

Comments

An Article 4 Direction has been made by the Secretary of State to remove permitted development rights regarding the change of use from class E use (Commercial, Business and Service uses) to C3 use (dwellinghouses).

Leavensden Park is an employment hub created as part of the Leavesden aerodrome redevelopment. The site comprises Leavesden Studios, now owned by Warner Brothers, together with MEPC's Leavesden Park office development. The site supports strategic activities relating to the creative industries sector and the planned investment will enable an enhanced role. The area is protected through Article 4 Direction that came into effect in March 2024. The site is connected to the strategic road network, with access from M25 Junction 19 (restricted) and Junction 20 via the A41, however access by public transport is limited. Any redevelopment should consider impact on nearby residential neighbourhoods including enhanced biodiversity measures.

Potential Allocation to be removed

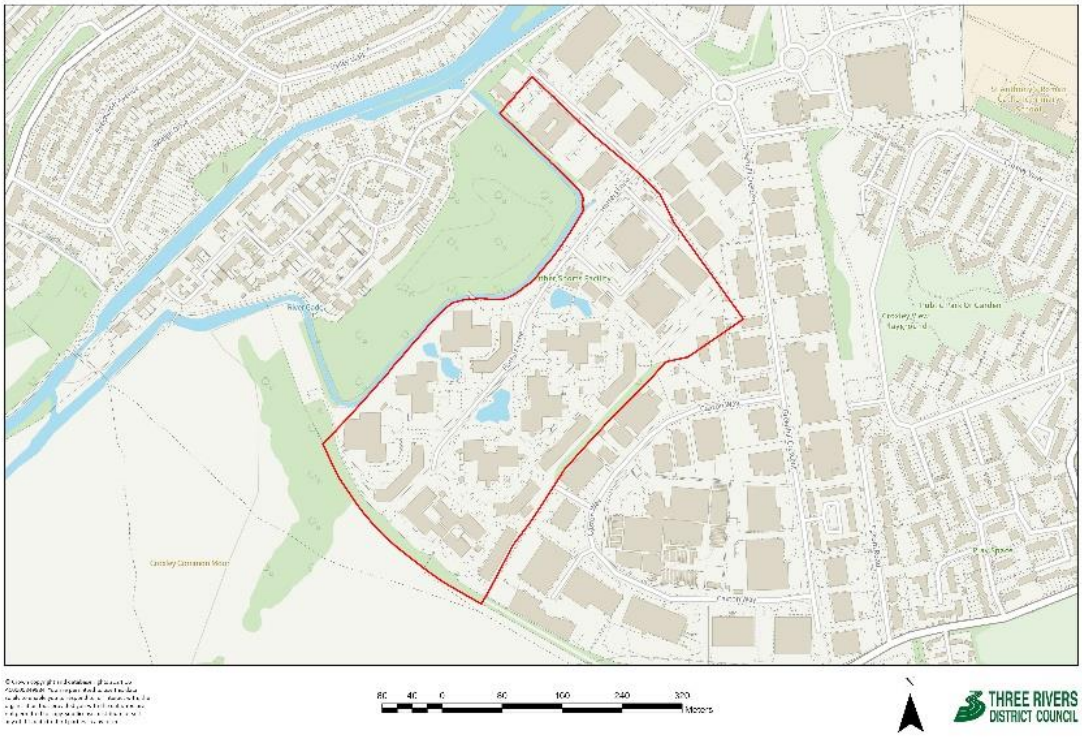
Site Ref.	CFS32a	Site	Land at Lynsters Farm, East of Old Uxbridge Road, Maple Cross	Size (ha):	10.7
				Current Use	Residential dwelling, agricultural buildings, grassland
				Proposed Use	Industry and warehousing
				Green Belt	Yes. If allocated, the Green Belt boundary would have to be revised.

Comments
Development would need to satisfactorily address the varied levels of risk of fluvial, surface water and groundwater flooding present across the site and suitable mitigation would need to be provided. A buffer distance from Flood Zone 3b (located to the south of the site) and any development would also be required. The site is in Groundwater Source Protection Zone 1; 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. Mitigation may also be required to ensure acceptability of the development in terms of odour exposure and amenity of future occupants due to the proximity of Maple Lodge Sewage Treatment Works to the north-east of the site. Development should not adversely impact on the continued operation of the operational waste site at Maple Lodge Sewage Treatment Works. A detailed heritage impact assessment and an archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. Development would need to take account of protected trees within the site and due to the adjacent Local Wildlife(s) and Local Nature Reserve, measures to avoid adverse impacts and enhance biodiversity would need to be provided. It should be noted that the whole of the site is not proposed for development and retention of the Grade II Listed building on the site would be required.

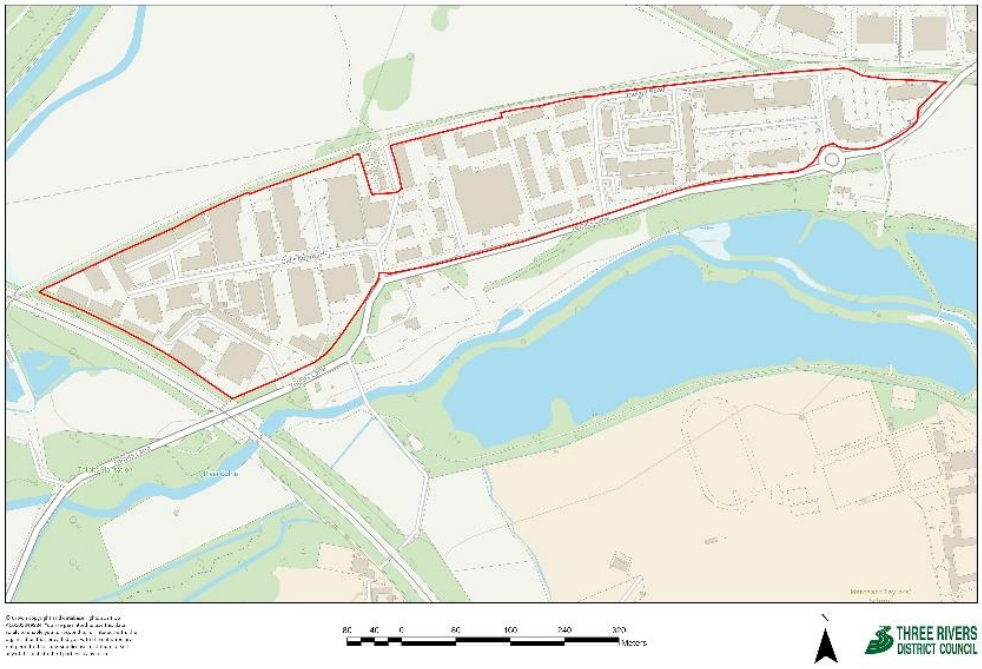
Existing Employment Allocations

There are several existing employment allocations in the District which were allocated in the Site Allocations LDD (adopted 2014) and have remaining capacity for employment use. These sites will be carried forward into the new Local Plan.

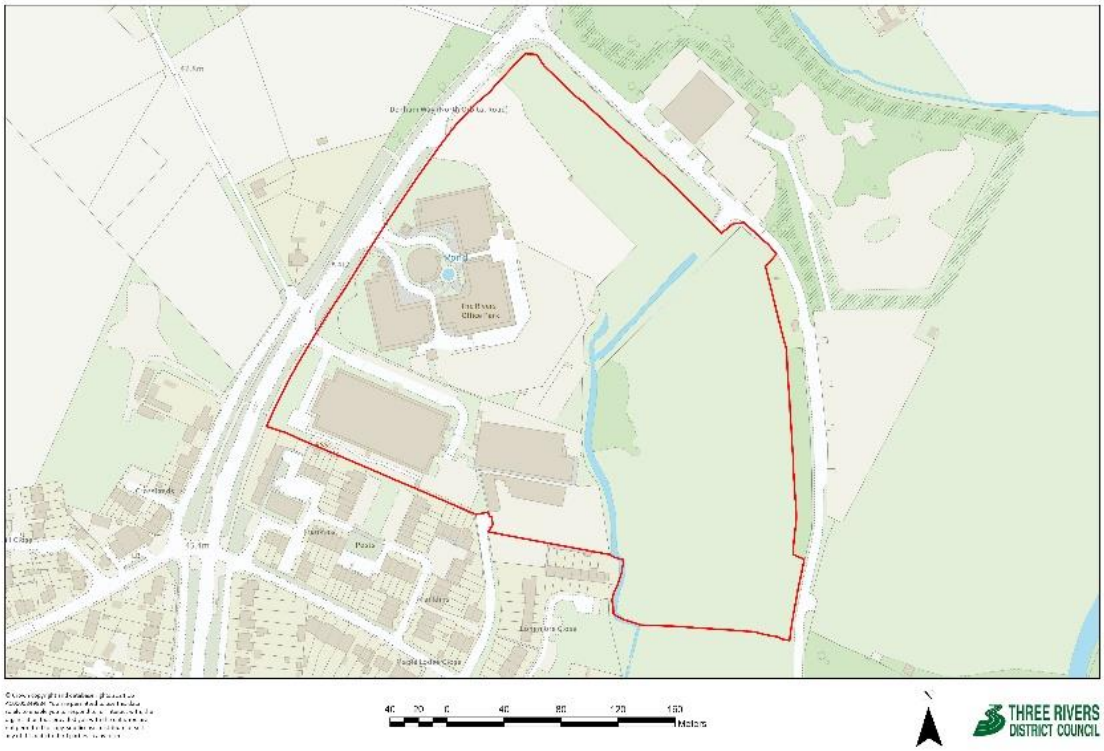
Site Ref.	E(a)	**Site**	Croxley Business Park	**Size (ha)**	15.2
				Allocation Use	Employment



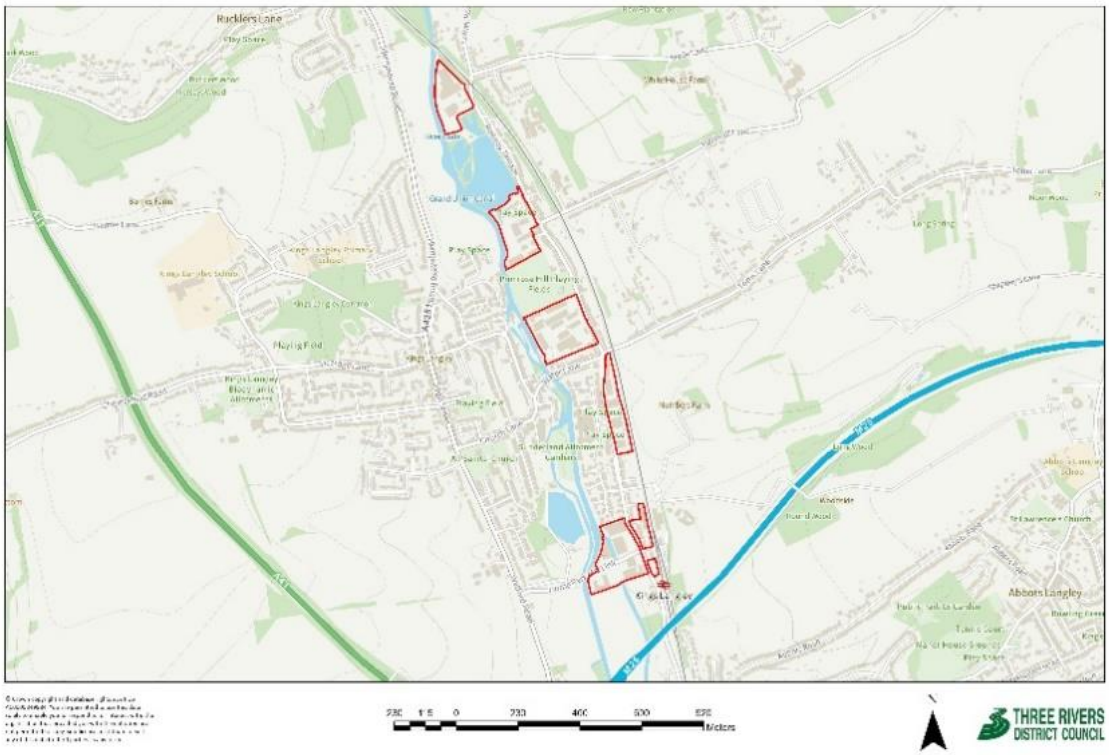
Site Ref.	E(b)	**Site**	Tolpits Lane	**Size (ha)**	22.2
				Allocation Use	Employment



Site Ref.	E(d)	Site	Maple Cross / Maple Lodge	Size (ha)	9
				Allocation Use	Employment



Site Ref.	E(e)	Site	Kings Langley Employment Area	Size (ha)	15.5
Allocation Use			Mixed use – Individual employment sites within the broad area have not been specifically identified.		



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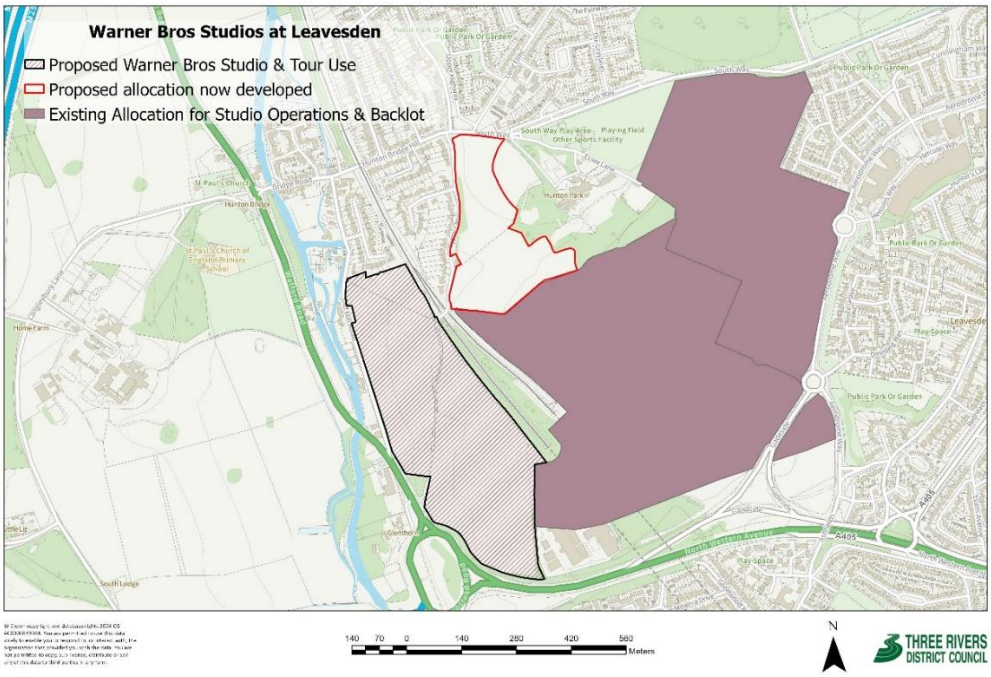
1 Warner Bros. Studios at Leavesden

1.1 The South West Herts Economic Study Update (2024) notes that the Warner Bros Film Studios in Leavesden is one of only a few locations in the UK where large scale film productions can be made. The site has also become a major visitor destination since the opening of 'Warner Bros. Studio Tour – The Making of Harry Potter' which receives over 6,000 visitors a day at peak times.

1.2 There is likely to be significant growth in demand for studio space over the next 15 years and there is still significant growth potential at the site. This is therefore a key asset for South West Herts and key to the future growth of creative industries in the economic market area. Warner Bros. has already invested significantly in the Studios and has further plans to increase its size by around a quarter, including new sound stages workshops, post production facilities and an extension of the studios tour.

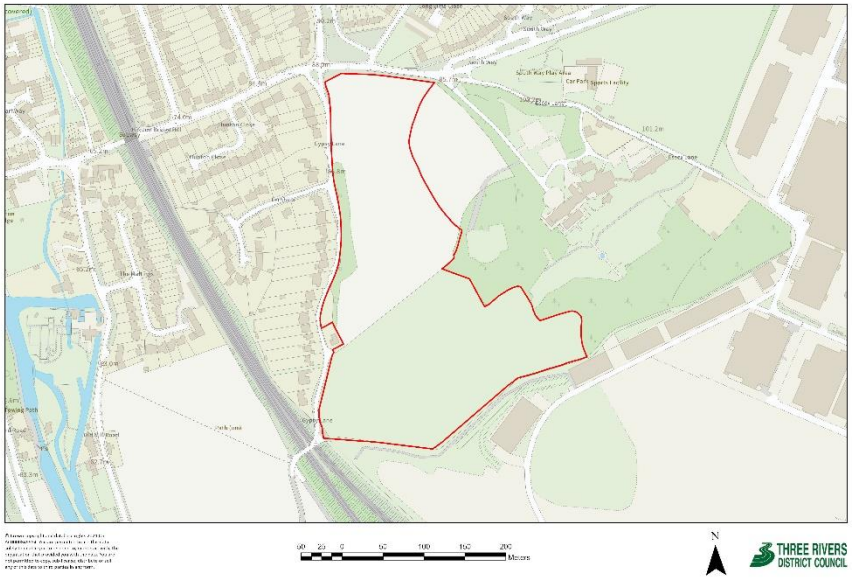
1.3 In order not to compromise the ability of Warner Bros. Studios at Leavesden to contribute to the local and national economy, both as a local employer and as a centre to contribute to the economic growth of the District over the Local Plan period, it is essential that Sites CFS28 and OSPF6 are allocated to allow the expansion of the studios and safeguarded for Warner Bros. Studio Use. Both of these sites are shown below and Preferred Policy Option 8 in Part 1 of this consultation document seeks to ensure that the land is safeguarded for Warner Bros. Studio use. Site OSPF6 now has the benefit of planning permission and part of the site has been developed as part of the permission for the provision of new sound stages, workshops, production and post-production offices (22/0491/FUL).

1.4 The map below shows the existing Warner Bros. Studio allocation together with the two preferred allocations proposed as an extension to the existing Warner Bros. Studios and backlot use. Land within both sites is also proposed for use as green infrastructure or as an ecological reserve, which will be allocated as public open space (see Section 8). An indicative masterplan showing the proposed uses on the sites is shown at paragraph 5.6.

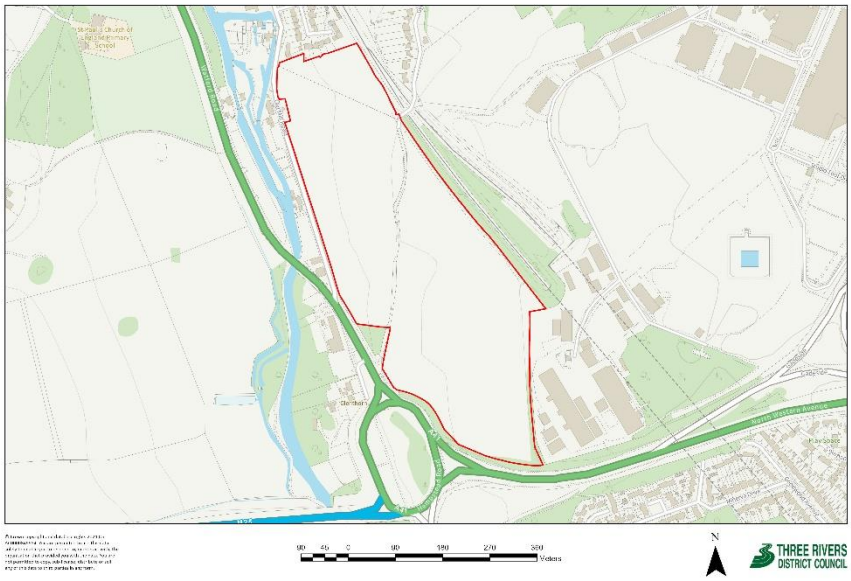


1.5 Details of the individual parcels of land are provided below.

Preferred Warner Bros. Studios at Leavesden Allocations

Site Ref.	CFS28	**Site**	Land at Gypsy Lane, Hunton Bridge	**Size (ha):**	8
				**Current Use**	Open land
				Proposed Use	Warner Bros. Studios & tour use and green infrastructure (public open space)
				Green Belt	Yes. If allocated, the Green Belt boundary would have to be revised.

Comments
A detailed heritage impact assessment and an archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. Development would need to take account of protected trees within the site. The site is located in Groundwater Source Protection Zone 1. Due to location the Local Wildlife which is adjacent to the site and partially within the site, measures to avoid adverse impacts and enhance biodiversity would need to be provided. Land to the north of the site is proposed as space for green infrastructure which is proposed to be allocated as public open space and land to the south of the site is proposed for Warner Bros. Studios and tour use (see indicative masterplan below).

Site Ref.	OSPF6	Site	Land west of Leavesden Aerodrome	Size (ha):	41.88
				**Current Use**	Open land
				Proposed Use	Warner Bros. Studios & tour use, green infrastructure and ecological reserve (public open space)
				Green Belt	Yes. If allocated, the Green Belt boundary would have to be revised

Comments

A detailed heritage impact assessment and an archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. Development would need to take account of protected trees and the Veteran Tree within the site. Consideration will need to be given to the public right of ways running through the site. The site is in Groundwater Source Protection Zone 1; 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. The southern part of the site recently received planning permission for the temporary change of use of land for the purposes of external film production for a period of two years (full details of the planning permission can be found on the Council's Planning Online facility by searching the permission reference 22/0491/FUL). The southern part of the site indicated by the replacement backlot and support facilities is currently being developed.

Land to the south of Gypsy Lane and to the north-west of Gypsy Lane is proposed for Warner Bros. Studios and tour use whilst land to the north-east of Gypsy Lane is proposed as green infrastructure and an ecological reserve, which is proposed to be allocated as public open space (see indicative masterplan below).

Indicative Masterplan (Warner Bros. Studios):

1.6 The following masterplan provides an indication of the proposed uses and the location of these uses on the preferred allocations for Warner Bros. Studios. The indicative masterplan also shows the existing allocations for Warner Bros. Studios use. The detail surrounding the proposed uses on the two preferred allocations for the new Local Plan (Site CFS28 and Site OSPF6) will be decided at the planning application stage should the sites be allocated for Warner Bros. Studios use. We are not seeking comments on the indicative masterplan and it is for *illustrative purposes only*.

KEY
Existing Public Right of Way
Existing studio use
Existing backlot
Proposed future expansion studio & tour
Proposed Ecological reserve and green infrastructure
Proposed access point
Proposed maintenance and emergency access point
Existing woodland/hedgerows and green corridors
Proposed landscape buffer
Existing trees
GREEN INFRASTRUCTURE
'SPECIALIST LOCATION' BACKLOT
ECOLOGICAL RESERVE
GREEN INFRASTRUCTURE
EXISTING BACKLOT AND SUPPORT FACILITIES
ADDITIONAL STAGES AND SUPPORT FACILITIES
BACKLOT AND SUPPORT FACILITIES
OFFICES, PARKING AND SUPPORT FACILITIES
MULTI-FUNCTION
WORKSHOPS
L STAGE

1 Town Centres and Retail

6.1 The Policy Option 9 of this consultation document sets out the proposed Retail Hierarchy, reflecting the size and relative importance of retail centres in the District. The proposed Town Centre Boundaries and Primary Shopping Areas for the Town Centre (Rickmansworth) and District Centres (South Oxhey, Abbots Langley and Chorleywood) are set out below, in line with the recommendations of the South West Herts Retail and Leisure Study (2018). The proposed Local Centres at Croxley Green (Watford Road and New Road) and Mill End (Moneyhill Parade) are also set out below.

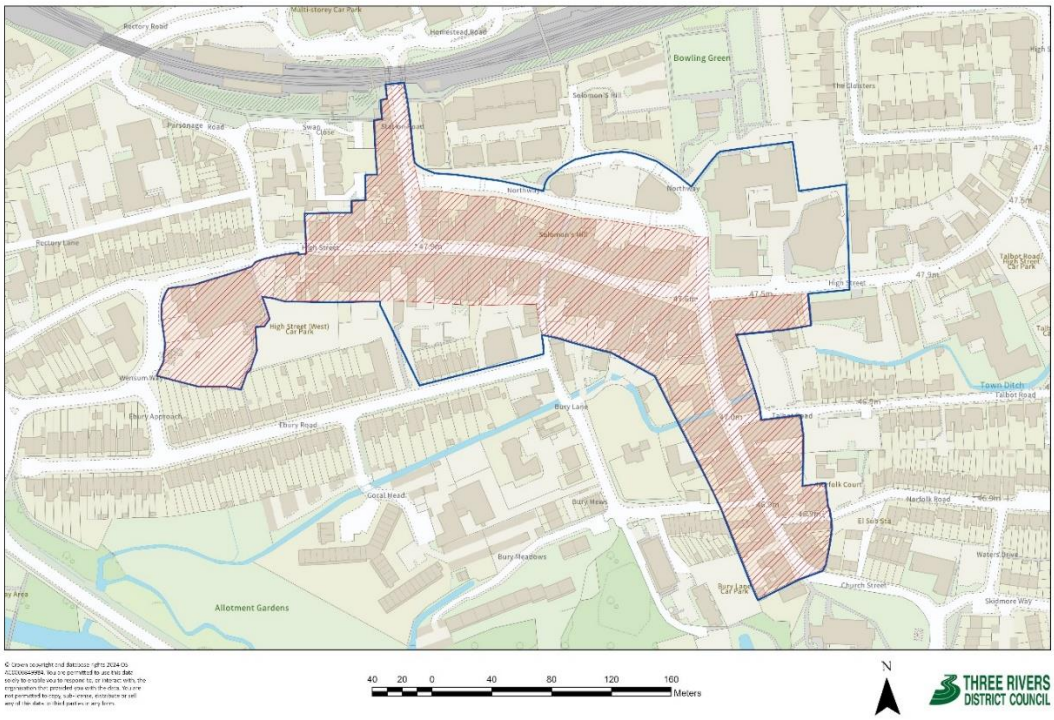
6.2 As stated in the Policy 9 of this consultation document, the Town and District Centres will be the focus for new town centre development and retail development will specifically be directed to the Primary Shopping Area within these centres in the first instance. As part of our strategy for protecting town and district centres, the Council has used its planning powers to introduce an 'Article 4 direction' to remove a permitted development rights that allow uses within Class E (Commercial, Business and Service) to change to residential use without planning permission. This means that planning permission is again required for such changes of use, and the Council can assess proposals against our planning policies, including consideration of the impact on the centre. The direction came into effect on 29 March 2024.

6.3 In addition to these larger retail centres, there are a number of smaller local shopping parades and individual shops throughout the District. It is not proposed to designate these small parades and individual shops individually as site allocations, however, Policy 9 of this consultation document seeks to protect and enhance these shops where they cater for local day to day needs.

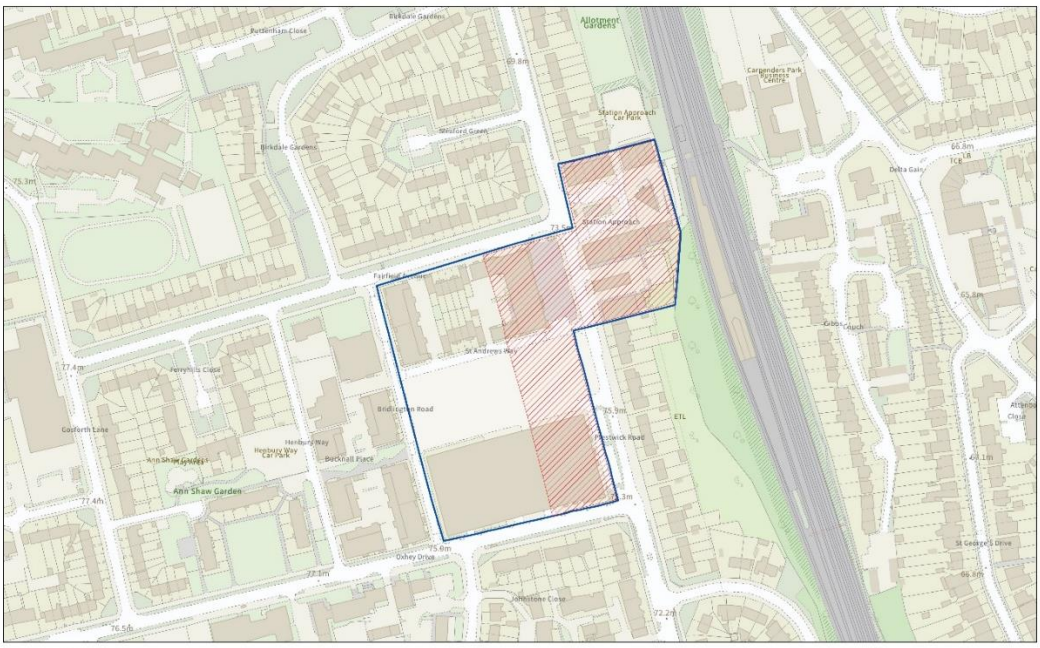
6.4 There may be opportunities for new provision as part of development proposals where this would help to meet the needs of the existing and new community and rectify local deficiencies in provision. The locations of any new provision of retail floorspace depends on a District Council decision on strategic housing site allocations and subsequent planning permissions that may be granted. As the designation of any new retail centres through future development proposals is uncertain, it is intended for any new centres to be included in the Retail Hierarchy at the nearest appropriate and possible time.

Preferred Retail Allocations

Site Ref.	R(a)	Site	Rickmansworth Town Centre

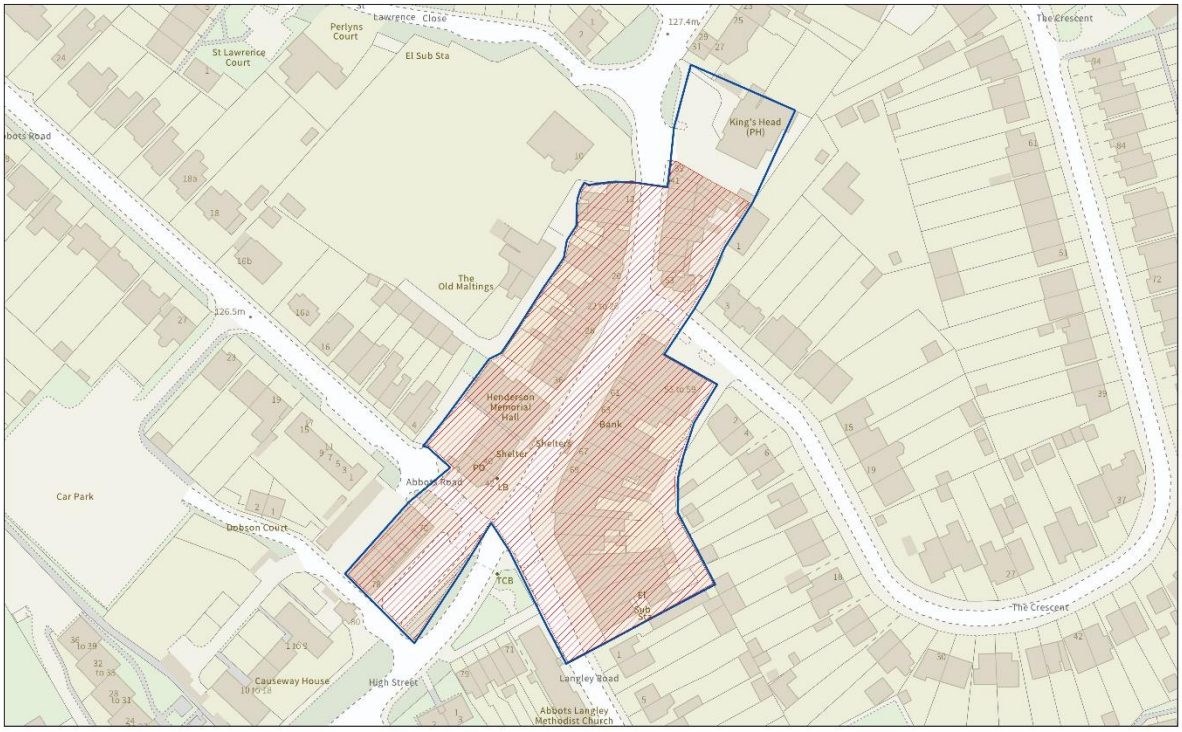


Site Ref.	R(b)	Site	South Oxhey District Centre

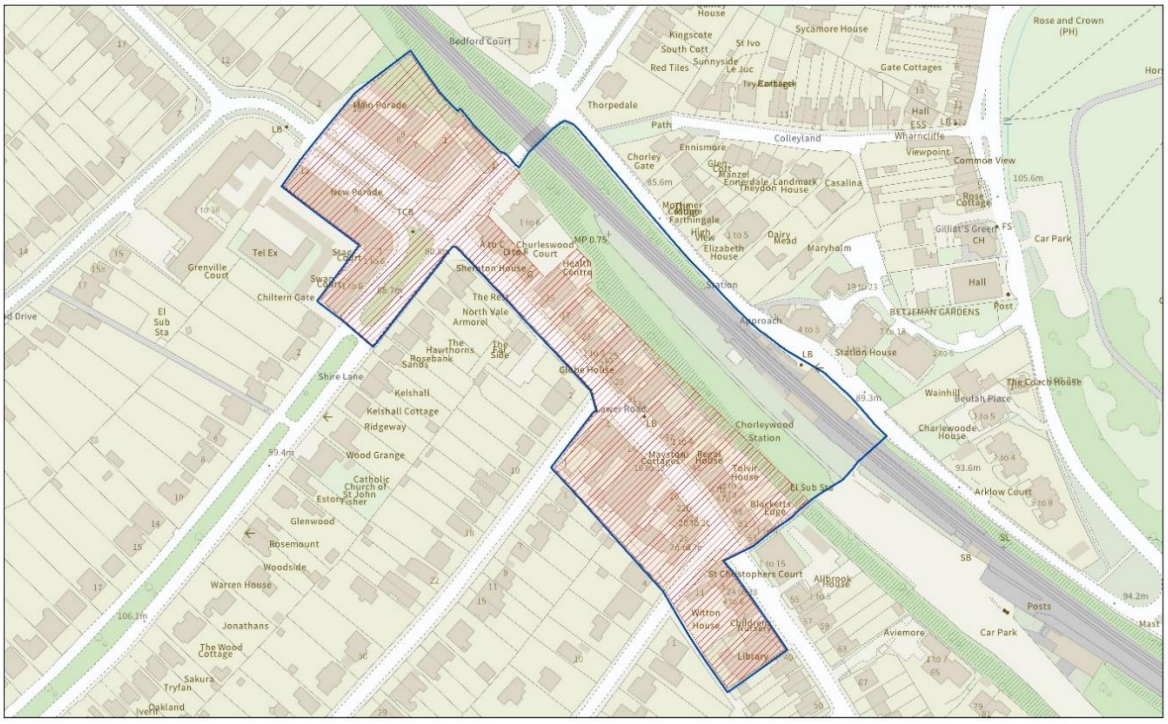


In order to ensure that the Proposed Town Centre Boundary and Primary Shopping Area boundaries accurately reflect the retail and town centre, the proposed boundaries may be subject to amendments as the ongoing redevelopment of South Oxhey Town Centre progresses to completion.

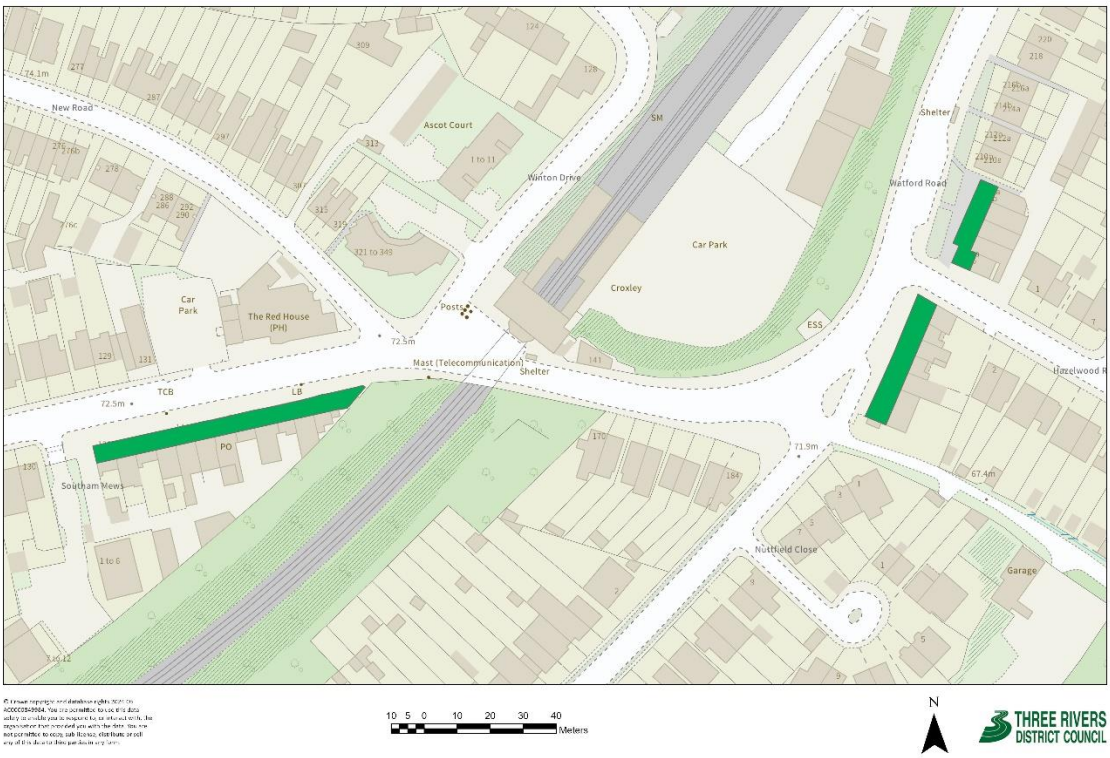
Site Ref.	R(c)	Site	Abbots Langley District Centre



Site Ref.	R(d)	Site	Chorleywood District Centre



Site Ref.	R(e)	Site	Watford Road, Croxley Green (Local Centre)



Site Ref.	R(f)	Site	Moneyhill Parade, Rickmansworth (Local Centre)

Site Ref.	R(g)	Site	New Road, Croxley Green (Local Centre)

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Education

1.1 It is vital that necessary infrastructure and services, including education, are integrated into new developments. Proposals must address such requirements for new and improvements infrastructure through direct, on-site provision or through the Community Infrastructure Levy which applies to certain forms of new development.

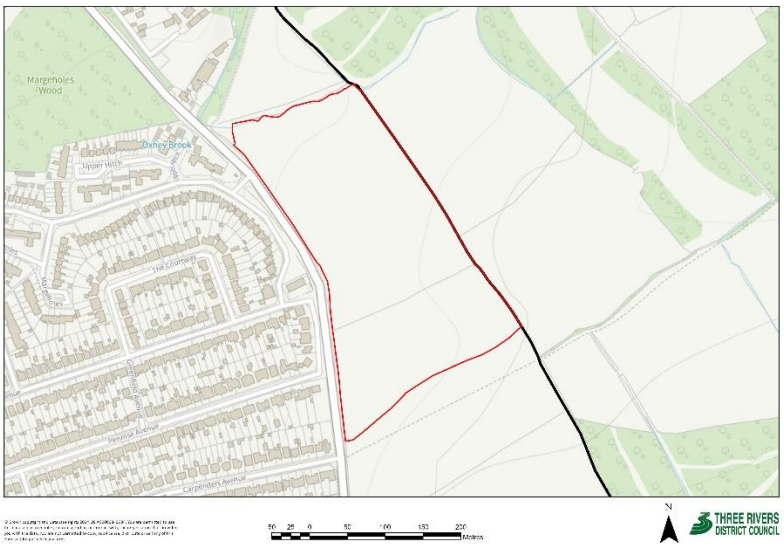
1.2 Where education provision is required on-site, this may be in the form of a new education facility or the expansion of an existing facility. Site-specific comments on the potential housing sites identify where a potential housing site would be required to contribute to meeting education needs through the provision of a new facility or the expansion of an existing facility.

1.3 In addition to the potential housing sites which would be required to provide education facilities, there is a site with potential to be allocated for a secondary school located to the north east of Carpenders Park (as shown below). Hertfordshire County Council is responsible for the provision of schools in the District and has identified a high level of need for a secondary school facility in this location in order to serve the future secondary education needs of the education catchment area (including Carpenders Park, South Oxhey and Eastbury in Three Rivers as well as areas in the Hertsmere and Watford Boroughs).The District has a variety of education facilities with capacity for either extensions to existing schools or the building of new schools. The remainder of land, for example at Long Lane, will be retained as an education allocation in the new plan to facilitate a new secondary school (or expansion of the Reach Free School) to meet additional demand arising from new development in the west of the district.

1.4 It should be noted that there is a reserve primary school site in Abbots Langley (Site S(c) Woodside Road) which was allocated in the Site Allocations LDD (adopted 2014) but has not yet been built out. A map of this existing allocation is provided below.

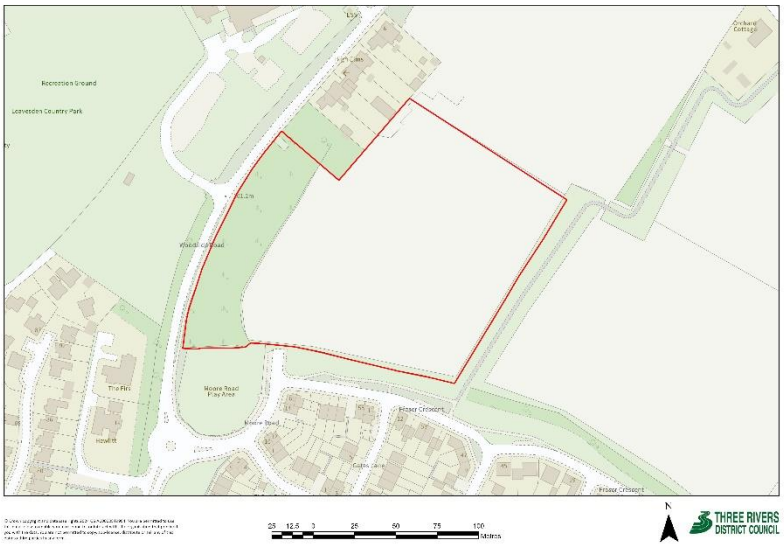
Proposed Policy on Education Allocations
Three Rivers District Council will continue to work with the County Council, adjoining authorities and other interested parties to identify the most appropriate sites to meet identified educational needs. Identified education sites for new primary or secondary schools will be safeguarded for educational use.

Proposed Education Allocation

Site Ref.	CFS11	Site	Carpenders Park Farm Oxhey Lane	Size (ha):	8.2
				Current Use	Agricultural
				Proposed Use	Secondary education
				Green Belt	Yes. If allocated, the Green Belt boundary would have to be revised to remove land for school buildings. Land for ancillary playing fields would remain in the Green Belt.
				Phasing	1-10 years

Comments
The site is potentially suitable to accommodate up to a 10fe secondary school. A detailed heritage impact assessment and an archaeological assessment would be required prior to any development in order to protect and mitigate any potential adverse impacts to heritage assets. Development would need to satisfactorily address surface water flood risk on the site by providing suitable mitigation. Measures to avoid adverse impacts and enhance biodiversity would need to be provided due to the location of a Local Wildlife Site which is adjacent to the site. Map provided by Cadent Gas shows Low/Medium pressure gas pipes in the vicinity of the site (west of the site along edge of Oxhey Lane) and it is likely that there are gas services and associated apparatus in the vicinity so their presence should be anticipated. This does not prevent development of the site but will require an appropriate buffer from the pipeline to development and is an issue to be addressed at the planning application stage.

Existing Education Allocation

Site Ref.	S(c)	Site	Woodside Road	Size (ha):	2.5ha
				Current Use	Agricultural
				Proposed Use	Primary education
				Green Belt	Part of the site is in the Green Belt and is allocated for use as ancillary playing fields. The part of the site allocated as the build zone area is not in the Green Belt.
				Phasing	1-10 years

Comments
The site is an existing education allocation in the Site Allocations LDD (adopted 2014). The site is allocated for primary education use and has capacity for a 2 form entry primary school.

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1 Open Space

1.1 The Site Allocations LDD (adopted 2014) sets out the existing public open spaces allocated for this use in the District. These existing open space allocations are shown in in the map below and it is intended that these areas will continue to be protected by retaining their allocation as public open space.

1.2 The Council therefore seeks to safeguard open spaces and sets out that future development proposals will be required to contribute to new provision of open space and children's play space where justified by the scale of development. Site-specific comments on the potential housing allocations identifies where the proposals would be required to contribute to open space and play space provision.

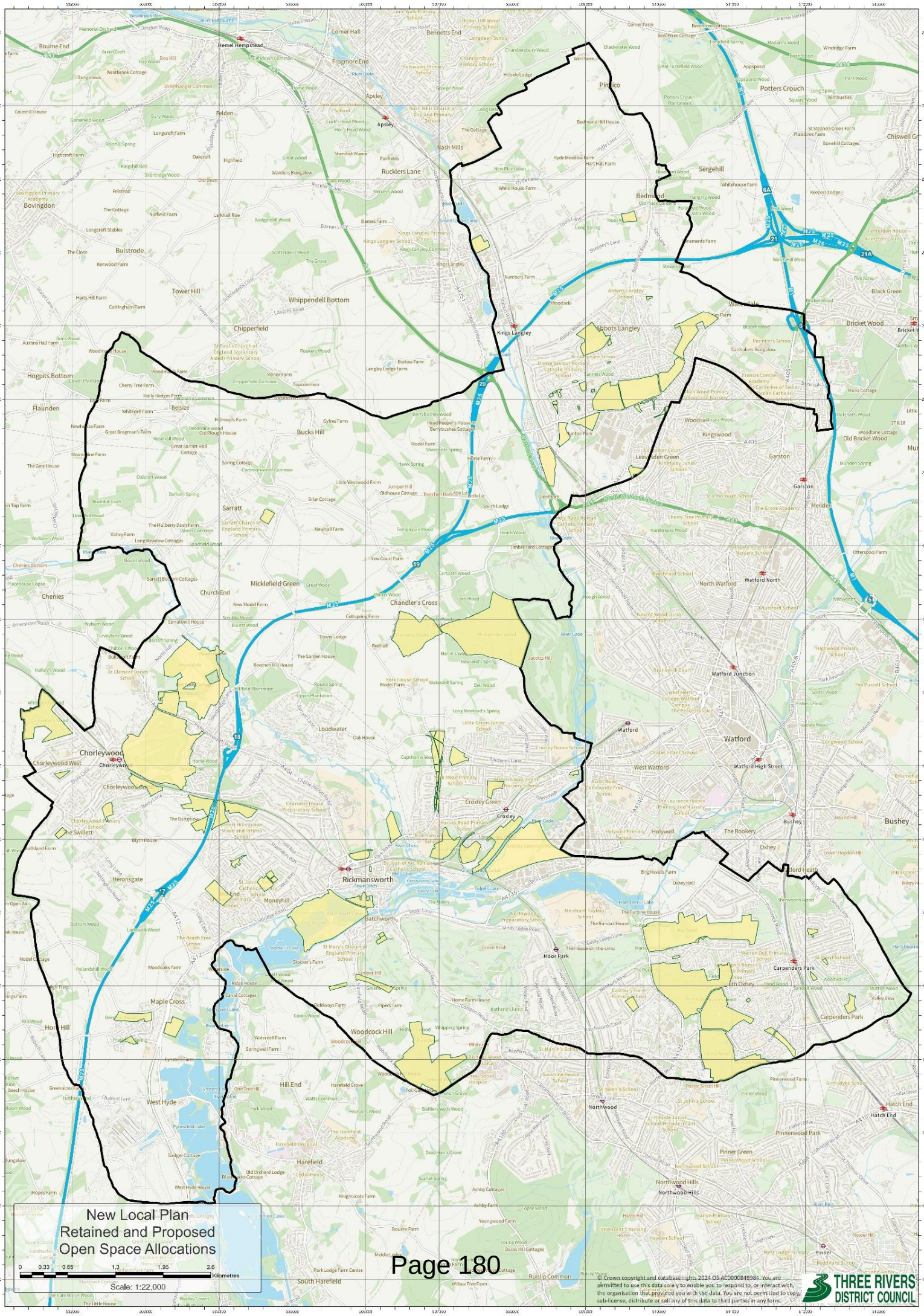
1.3 The location of new future provision of open space and play space depends on a District Council decision on housing site allocations and on planning permissions that may be granted both for windfall sites and future allocation sites (where such provision is required). As the designation of any new open and play spaces through future development proposals is uncertain, it is intended for any new open spaces and play spaces to be allocated as public open space and be included in the Policies Map at the nearest appropriate and possible time.

1.4 However, two new public open spaces are proposed on the preferred allocations for Warner Bros. (Sites CFS28 and OSPF6). The proposed public open spaces on these sites are shown in Appendix 4.

1.5 New opens paces created as a result of development affecting the Chiltern Beechwoods SAC will be considered the Chelitern Beechwoods SAC policy and requirements set out therein.

1.6 National and local planning policy will guide planning decisions on sites which are not specifically allocated as open spaces.

1.7 A list and map of the proposed open space allocations to be retained is shown in Appendix 4 and Appendix 5 respectively.


New Local Plan
Retained and Proposed
Open Space Allocations
0 0.33 0.65 1.3 1.95 2.6 Kilometres
Scale: 1:22,000
THREE RIVERS DISTRICT COUNCIL
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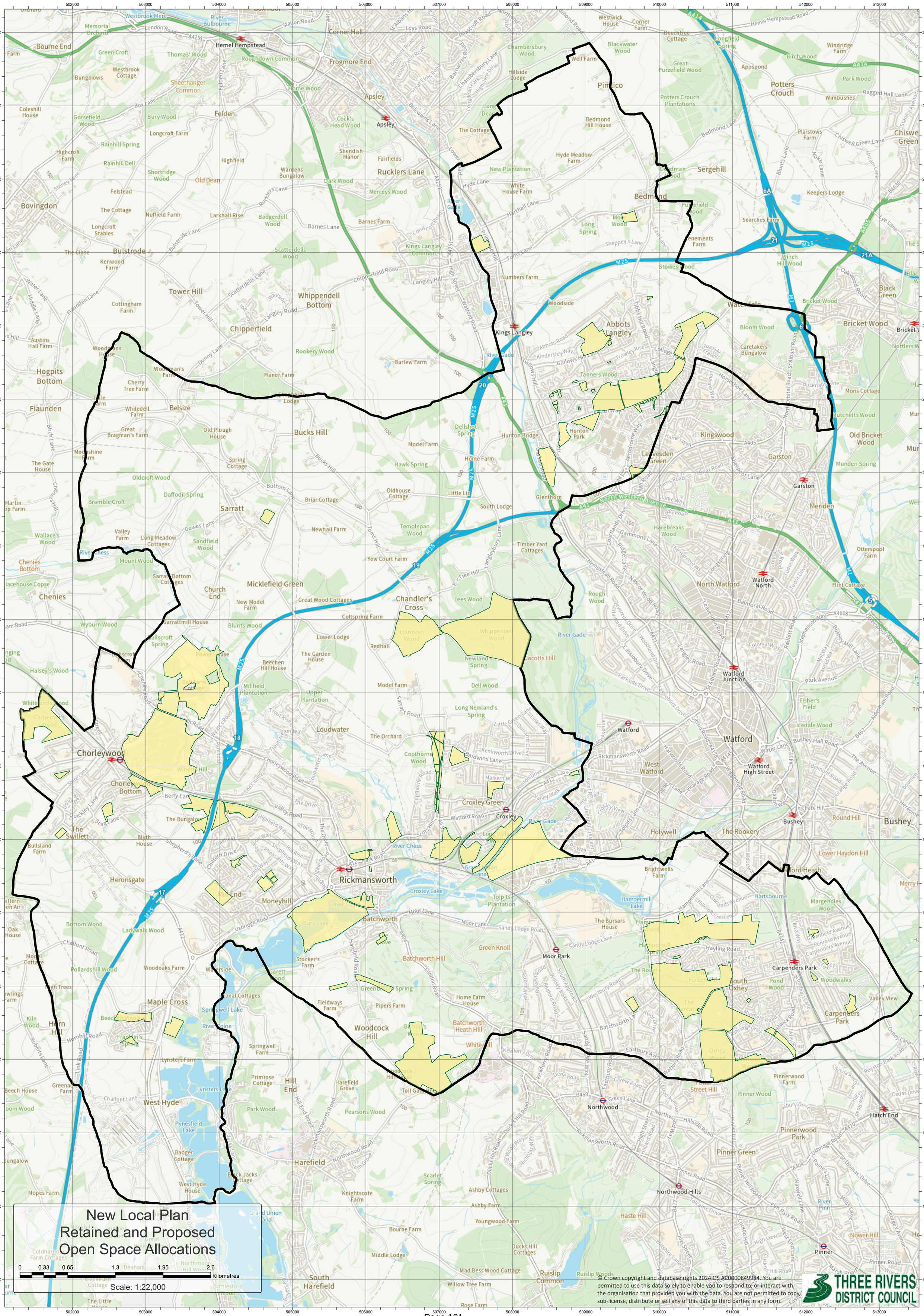
New Local Plan
Retained and Proposed
Open Space Allocations
0 0.33 0.65 1.3 1.95 2.6
Kilometres
Scale: 1:22,000
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THREE RIVERS DISTRICT COUNCIL

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1 Maple Lodge Wastewater Treatment Works

1.1 Maple Lodge Wastewater Treatment Works is a substantial developed feature in the local landscape to the east of Maple Cross and has an industrial character. It is a key infrastructure asset serving Three Rivers and the wider area. The Site Allocations LDD (adopted 2014) identifies Maple Lodge Wastewater Treatment Works as a significant infrastructure site in the Green Belt.

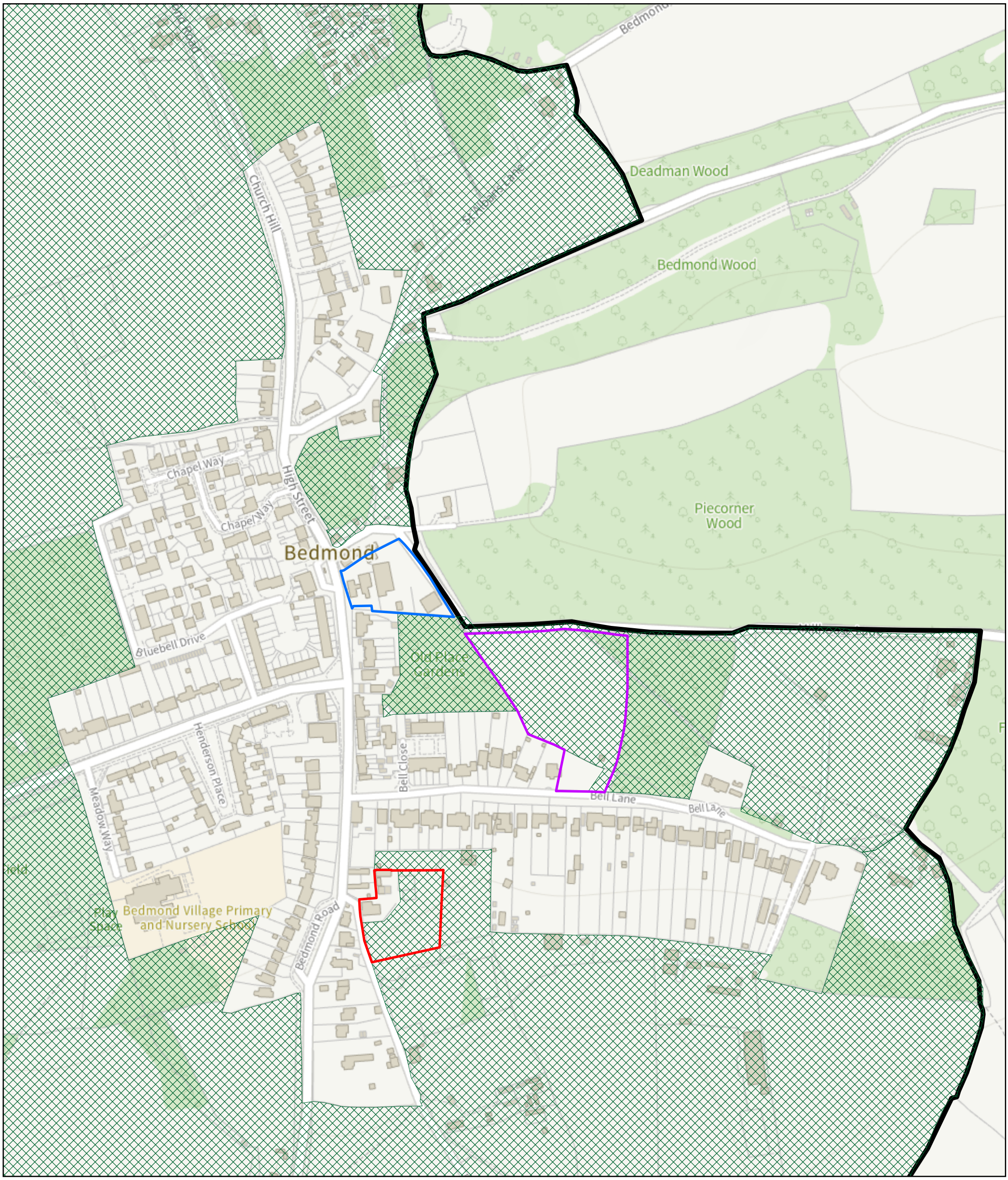
1.2 No change is proposed to the designation of the Maple Lodge Wastewater Treatment Works as a significant infrastructure site in the Green Belt. The site is shown below.

1.3 It is recognised that change on the site may be required to meet future operational needs[1]. Whilst redevelopment or limited infilling of the site may not be inappropriate development in the Green Belt, proposals should continue to take into account the provisions of the policy set out below and any redevelopment and limited infilling should safeguard the continued use of the site for wastewater treatment works. As a consequence of this allocation, the Green Belt boundary has been revised.

Proposed Policy on Maple Lodge Wastewater Treatment Works
Maple Lodge Wastewater Treatment Works is a significant infrastructure site in the District. The landscaped setting provided by mature vegetation on the site boundaries and area surrounding the site should be retained in any proposals for infilling or redevelopment. Any further buildings should be of comparable height to other nearby structures on the site.

Site Ref.	MLWTW	**Site**	Maple Lodge Wastewater Treatment Works

[1] Any such requirements will be set out in the Infrastructure Delivery Plan for the new Local Plan



0 30 60 120 180 240 Metres

THREE RIVERS DISTRICT COUNCIL

- District Boundary
- Draft Green Belt Boundary Revision
- NSS6A - Proposed Housing SIte
- NSS2 - Proposed Housing Site
- CFS10 - Not currently proposed for allocation, may come forward for retirement housing

N

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REPRESENTATIONS – PART 2 EMPLOYMENT

Affinity Water

Site	Representation	Officer/Council Response	Officer's/Council's Proposed Action
CFS70a Croxley Business Park, Hatters Lane, Croxley Green	- Site is within or close to SPZ1 - Significant mains apparatus in the vicinity of site boundaries	Noted. Sites within or close to SPZ1 need to take into consideration Environment Agency guidance	Representations by EA will be taken into consideration
CFS70b Croxley Business Park, Hatters Lane, Croxley Green	- Site is within or close to SPZ1; - Significant mains apparatus in the vicinity of site boundaries	Noted. Sites within or close to SPZ1 need to take into consideration Environment Agency guidance	Representations by EA will be taken into consideration
Site CFS32a Land at Lynsters Farm, East of Old Uxbridge Road, Maple Cross	- Site is within or close to SPZ1; - Significant mains apparatus in the vicinity of site boundaries	Noted. Sites within or close to SPZ1 need to take into consideration Environment Agency guidance	Representations by EA will be taken into consideration

Watford Borough Council

Site	Representation	Officer/Council Response	Officer's/Council's Proposed Action
CFS70a Croxley Business Park, Hatters Lane, Croxley Green	As the long-term leaseholder for the business park, the allocation is supported to add value to the support the employment area.	Support welcomed	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.
CFS70b Croxley Business Park, Hatters Lane, Croxley Green	As the long-term leaseholder for the business park, the allocation is supported in principle.	Support welcomed	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. The Landscape Sensitivity Assessment classifies the site as having a medium-low sensitivity to built development. Local Nature Reserve: The site's western boundary is adjacent to a Local Nature Reserve (Croxley Common Moor). SSSI: The site's western boundary is adjacent to an SSSI (Croxley Common Moor SSSI East). <u>SA conclusion</u> The site has an existing permission for a leisure use, which is intended to support Croxley Business Park. The site is considered suitable as an ancillary leisure use to support the existing employment allocation, as approved in a planning application (18/1415/FUL).

Croxley Green Parish Council

Site	Representation	Officer/Council Response	Officer's/Council's Proposed Action

CFS70a Croxley Business Park, Hatters Lane, Croxley Green	This site is not suitable for the development proposed as may result in fragmentation or isolation of wildlife habitats and should seek opportunities for habitat connectivity with the wider landscape. We object to the proposal.	The SA acknowledges site considers its locations adjacent to the SSSI. Site is proposed for ancillary use (Sport & Leisure). The site comment in the Part 2 document states that 'The site is adjacent to a Site of Special Scientific Interest and Local Nature Reserve (Croxley Common Moor) and measures to avoid adverse impacts and enhance biodiversity would need to be provided.' This will be addressed at the planning application stage.	No action
CFS70b Croxley Business Park, Hatters Lane, Croxley Green	- Site not suitable for the development as proposed, as development would conflict with preferred policy 21(7) "Linked habitats are important …. Development must not result in fragmentation or isolation of wildlife habitats and should seek opportunities for habitat connectivity with the wider landscape. - The existing permission for leisure use is an acceptable use of Green Belt designated land but further development is not, particularly when sites for employment use are being converted to housing within Three Rivers.	Noted The SA acknowledges site considers its locations adjacent to the SSSI. Site is proposed for ancillary use (Sport & Leisure). The site comment in the Part 2 document states that 'The site is adjacent to a Site of Special Scientific Interest and Local Nature Reserve (Croxley Common Moor) and measures to avoid adverse impacts and enhance biodiversity would need to be provided.' This will be addressed at the planning application stage.	No action
Natural England			
Site	**Representation**	**Officer/Council Response**	**Officer's/Council's Proposed Action**
CFS70b Croxley Business Park, Hatters Lane, Croxley Green	CFS70b – potential effects of this allocation for employment development on the SSSI should be assessed through the sustainability appraisal	Noted. The SA acknowledges site considers its locations adjacent to the SSSI. Site is proposed for ancillary use (Sport & Leisure). The site comment in the Part 2 document states that 'The site is adjacent to a Site of Special Scientific Interest and Local Nature Reserve (Croxley Common Moor) and measures	No action

		to avoid adverse impacts and enhance biodiversity would need to be provided.' This will be addressed at the planning application stage.	
Canal & River Trust			
Site	**Representation**	**Officer/Council Response**	**Officer's/Council's Proposed Action**
CFS70b Croxley Business Park, Hatters Lane, Croxley Green	Any extension to existing employment site would need to identify any potential contamination issues and provide a drainage strategy.	Noted. Any contamination issues to be addressed and provided as part of a drainage strategy.	No action
Site CFS32a Land at Lynsters Farm, East of Old Uxbridge Road, Maple Cross	Landscaping buffer required, as well as a drainage report	Noted. An additional drainage requirement can be added to the site allocation, as well as a landscaping buffer	No action
Thames Water			
Site	**Representation**	**Officer/Council Response**	**Officer's/Council's Proposed Action**
Site CFS32a Land at Lynsters Farm, East of Old Uxbridge Road, Maple Cross	Site CFS32a proposed for industry and warehousing use will require an odour impact assessment.	Noted.	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. The Landscape Sensitivity Assessment classifies the site as having a medium sensitivity to built development (this assessment includes land to the south – Site CFS32). Ecology: Hertfordshire County Council Ecology state that the site has a very high ecological sensitivity due to the surviving wet grassland between two important wetland sites. The Heritage Impact Assessment states that the site's development would have a moderate adverse impact on the historic environment, as the Listed Building currently sits within its historic setting of an agricultural landscape. The majority of the site is in Flood Zone 2; this surrounds the existing built development on the site. The remainder of the site, to west of the site and in the area of built development, is Flood Zone 1. Land to the immediate south of the south-western corner is in Flood Zone 3b and therefore an appropriate buffer distance would be required from any development. Surface Water Flood Risk: The site is at a high risk of surface water flooding.

			Groundwater Flood Risk: The entire site is at very high risk of groundwater flooding. 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.
HCC Growth & Infrastructure			
Site	**Representation**	**Officer/Council Response**	**Officer's/Council's Proposed Action**
Site CFS32a Land at Lynsters Farm, East of Old Uxbridge Road, Maple Cross	Some of the site would be within the recommended 400m walking distance of bus stops along Denham Way, but these only have very limited bus services. It is therefore considered that the site is not likely to be able to generate enough patronage for any viable service improvements in the long term.	Noted	Representations by HCC will be taken into consideration

REPRSENTATIONS – PART 2 WARNER BROS. STUDIOS AT LEAVESDEN			
Historic England			
Site	**Representation**	**Officer/Council Response**	**Officer's/Council's Proposed Action**
Site CFS28 Land at Gypsy Lane, Hunton Bridge	- Support Expansion - A general Heritage Impact Assessment (HIA) is prepared to inform any development criteria that may be required in terms of design and layout. - Given the scale of development proposed, we strongly advise 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 HIA, and this should be stipulated in policy.	Support noted. Any future proposals would need to be accompanied by a detailed heritage impact assessment and discussions with the Conservation Officer	No action

Site OSPF6 Land west of Leavesden Aerodrome	- Support expansion - A general Heritage Impact Assessment (HIA) is prepared to inform any development criteria that may be required in terms of design and layout. - Given the scale of development proposed, we strongly advise 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 HIA, and this should be stipulated in policy.	Support noted. Any future proposals would need to be accompanied by a detailed heritage impact assessment and discussions with the Conservation Officer	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.

Affinity Water

Site	Representation	Officer/Council Response	Officer's/Council's Proposed Action
Site CFS28 Land at Gypsy Lane, Hunton Bridge	Site is within or close to SPZ1	Noted. Sites within or close to SPZ1 need to take into consideration Environment Agency guidance.	Representations by EA will be taken in to consideration.
Site OSPF6 Land west of Leavesden Aerodrome	Site is within or close to SPZ1	Noted. Sites within or close to SPZ1 need to take into consideration Environment Agency guidance.	Representations by EA will be taken into consideration

Watford Borough Council

Site	Representation	Officer/Council Response	Officer's/Council's Proposed Action
Site CFS28 Land at Gypsy Lane, Hunton Bridge	The proposed allocation will expand the existing site and encroach in the Green Belt. While the HS6 and OSPF6 will both result in the release of Green Belt, the impact is not likely to be significant with the A41 separating the sites.	Noted	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

Site	Representation	Officer/Council Response	Officer's/Council's Proposed Action

Site CFS28 Land at Gypsy Lane, Hunton Bridge	Visitors can access the site by dedicated shuttle or other local bus services calling outside the site. The Site Travel Plan therefore needs to be kept up to date.	Noted	No action

REPRESENTATIONS – PART 2 OPEN SPACE		
HCC Growth and Infrastructure		
Representation	**Officer/Council Response**	**Officer's/Council's Proposed Action**
Appendix 1 sets out Site Specific Ecology Comments	Appendix 1 sets out Site Specific Ecology Comments	Representations by HCC Ecology will be taken into consideration

REPRESENTATIONS – PART 2 EDUCATION			
HCC Growth and Infrastructure			
Question/Site	**Representation**	**Officer/Council Response**	**Officer's/Council's Proposed Action**
Do you think the Proposed Policy for Education Allocations is the right approach?	- It should be noted that planning for secondary school provision is a strategic matter that requires consideration of growth beyond the administrative boundaries of individual local planning authorities in Hertfordshire. - Furthermore, future secondary school places in Three Rivers, and Hertsmere, will be subject to increased pressure due to the plans for housing growth in Watford Borough, where the emerging local plan does not allocate land for the development of a new secondary school that can meet the needs of growth within the administrative boundary. - Following the conclusion of this consultation period, the county council welcomes further engagement regarding the development of a secondary education strategy to support both this plan, and the wider needs of south west Hertfordshire. - In terms of SEND education provision, the proposed development is also expected to result in increased need for school places for pupils with SEND. To support additional SEND provision, land at Little Green Lane (former Durrants playing fields) should be	- Noted. Ongoing discussions will continue with HCC in meeting new education provision as part of new developments coming forward. - Education provision is not usually shown on a policies map. However any sites to be removed from the GB will be shown. - SEND provision, land at Little Green Lane (former Durrants playing fields) has been removed from site allocations (see Appendix 2) - Land at Long Lane- The remainder of the site should be retained as an education allocation in the new plan to facilitate a new secondary school (or expansion of the Reach Free School) to meet additional demand arising from new development in the west of the district (Chorleywood, Maple Cross, Mill End and Rickmansworth).	Representations by HCC Transport/ Education will be taken into consideration.

	allocated for education to facilitate the delivery of a new SEND school. - In order to ensure the effectiveness and deliverability of the respective education allocations, as the construction of new buildings in the Green Belt is inappropriate development and is therefore contrary to the NPPF. The county council will consider submitting a soundness objection to the forthcoming regulation 19 local plan, if the respective education allocations are not shown on the proposals map and relevant inset map and where applicable, the build zones remain in the Green Belt. - Land at Long Lane. Part of the site is currently occupied by the Reach Free School. The remainder of the site should be retained as an education allocation in the new plan to facilitate a new secondary school (or expansion of the Reach Free School) to meet additional demand arising from new development in the west of the district (Chorleywood, Maple Cross, Mill End and Rickmansworth). - Accompanying inset maps indicating the two sites, where the build zone has been (where possible) removed from the Green Belt, should be shown within this section of the plan. - Dedicated home to school transport provision will need to be considered to ensure that it is in line with HCC policy (see Travel to school | Hertfordshire County Council). - Langleybury and The Grove. The supporting text within this section does not state numbers of dwellings anticipated for Langleybury (site H7 indicates only 25 dwellings but previous consultations have stated 120-180 dwellings). This site is not appropriate for significant residential development as it is remote from existing bus services. - Although a small residential development may only generate limited trips, the county council would not support a larger residential-led allocation on this site, as the location of this site is likely to encourage car-based trips. - The impact of hotel/leisure use depends on scale, but any trips are likely to be car based. It is considered that this site has limited potential for sustainability in transport terms	- Langleybury and The Grove. The supporting text within this section does not state numbers of dwellings anticipated for Langleybury (site H7 indicates only 25 dwellings but previous consultations have stated 120-180 dwellings). This site is not appropriate for significant residential development as it is remote from existing bus services. Although a small residential development may only generate limited trips, the county council would not support a larger residential-led allocation on this site, as the location of this site is likely to encourage car-based trips. - It is considered that this site has limited potential for sustainability in transport terms	
CFS11 Carpenders Park Farm, Oxhey Lane	- Support allocation. The site is potentially suitable to accommodate up to a 10fe secondary school. - The school build zone should (where possible) be removed from the Green Belt and shown separately on the	Support noted. Any future proposals would need to be accompanied by a detailed heritage impact assessment and discussions with the Conservation Officer	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.

	accompanying inset map. The county council can assist the district council in relation to this matter, prior to the forthcoming Regulation 19 consultation.		
Do you believe there are more suitable alternative sites (to CFS11)?	**Site S(c) Woodside Road -** allocation supported. It is requested that the plan shows the extent of the agreed build zone that is to be removed from the Green Belt, which is currently shown on the existing inset map for this site, within the adopted Site Allocations DPD.	Support noted	Representations by HCC will be taken into consideration.

Cadent Gas

Question/Site	Representation	Officer/Council Response	Officer's/Council's Proposed Action
CFS11 Carpenders Park Farm, Oxhey Lane	Cadent has identified the following apparatus within the vicinity of the site: - Low or Medium pressure (below 2 bar) gas pipes and associated equipment. (As a result, it is highly likely that there are also gas services and associated apparatus in the vicinity, these are not shown on plans but their presence should be anticipated) - Cadent has a Deed of Grant of Easement for each pipeline, which prevents the erection of permanent /temporary buildings, or structures, change to existing ground levels, storage of materials etc. - Written permission is required before any works commence within the Cadent easement strip.	- Noted. Map provided by Cadent Gas shows Low/Medium pressure gas pipes in the vicinity of the site (west of the site along edge of Oxhey Lane) and it is likely that there are gas services and associated apparatus in the vicinity so their presence should be anticipated. - This does not prevent development of the site but will require an appropriate buffer from the pipeline to development and is an issue to be addressed at the planning application stage. Additional wording to be added to site description.	Representations by Cadent Gas to be taken into consideration.

Watford Rural Parish Council

Question/Site	Representation	Officer/Council Response	Officer's/Council's Proposed Action
CFS11 Carpenders Park Farm, Oxhey Lane	- Objects to building on Green Belt-Merging with Bushey - Concern about traffic and congestion, historical flooding, impact on LWS - Prefer secondary school on Little Oxhey Lane Site if bridge rebuilt	- Noted - Representations from the Hertfordshire Highways Authority will be taken in to consideration, The Transport Assessment will identify mitigation measures required and any identified measures will be included in the Infrastructure Delivery Plan. - Proposals would need to provide suitable mitigation to address the surface water flooding - Measures to avoid adverse impacts and enhance biodiversity would need to be provided due to the location of a Local Wildlife	The Stage 2 Green Belt Review assessed harm to the Green Belt of releasing the wider parcel (in which the site is located) as very high. The Landscape Sensitivity Assessment classifies the site as having a medium-high sensitivity to built development. HCC -Access from Oxhey Lane could be provided. HCC Highways recognise that access would need to be onto an A road (Oxhey Lane) and state that the impact of development on the A4008/Oxhey Lane would need to be fully understood/circumstances

		Site which is adjacent to the site. Preference noted but site not available for secondary school nor are there any plans to rebuild the bridge.	would need to be demonstrated. SA Conclusion. The construction of new school buildings in the Green Belt is considered inappropriate development and subsequently, any build zone of the school site would require release from the Green Belt. The playing field area would not require release from the Green Belt. It is considered that the exceptional need for a secondary school in this location outweighs the 'very high' level of harm in releasing this land from the Green Belt. The site is deemed suitable for the allocation of a secondary school. The site is both available and achievable. The need for housing does not outweigh 'very high' harm to the Green Belt through the release of land and therefore the site is not considered to be suitable for residential development.

Dacorum Borough Council

Question/Site	Representation	Officer/Council Response	Officer's/Council's Proposed Action
CFS11 Carpenders Park Farm, Oxhey Lane	Support policy approach	Support noted	No action

Affinity Water

Question/Site	Representation	Officer/Council Response	Officer's/Council's Proposed Action
CFS11 Carpenders Park Farm, Oxhey Lane	Significant mains apparatus within site	Noted. Sites within or close to SPZ1 need to take into consideration Environment Agency guidance.	Representations by EA will be taken into consideration.

Hertsmere Borough Council

Question/Site	Representation	Officer/Council Response	Officer's/Council's Proposed Action
CFS11 Carpenders Park Farm, Oxhey Lane	Clarity requested about how the secondary school will impact on supply and demand of school places in Bushey/Watford school planning area	Noted. That is a matter for Hertfordshire County Council to provide information on. Included in their representation	No action

Watford Borough Council

Question/Site	Representation	Officer/Council Response	Officer's/Council's Proposed Action
CFS11 Carpenders Park Farm, Oxhey Lane	- Support secondary school - This proposed site allocation will need to be considered in conjunction with sites CFS11, CFS14 and GT8 because of the significant harm to the Green Belt. This is particularly important for the merging of settlements which the Green Belt study has identified as having a significant function between Watford Health and Carpenders Park and development here would cause significant harm. - The Green Belt Stage 2 study said the loss of this area would cause low to moderate harm rating. However, in combination with CFS14, the Green Belt will become very narrow around Oxhey Brook the sense of openness is will have disappeared leading to the two settlement effectively being merged.	Noted	No action

REPRESENTATIONS – PART 2 GREEN BELT & PROPOSED INSETTING OF BEDMOND

Dacorum Borough Council

Question	Representation	Officer/Council Response	Officer's/Council's Proposed Action
Do you agree with the revised Green Belt boundary to inset Bedmond and the reasons why?	- Do not object to principle of insetting Bedmond from the Green Belt as it already built up; - Concerned about combination of Green Belt removal and outward expansion under CFS10, CFS56 and ACFS9e and implications for long term role and function of Green Belt here.	Noted	Representations by DBC to be taken into consideration.

Summary of Public Responses for Non-housing Allocations

Employment:

CFS70a Croxley Business Park, Hatters Lane, Croxley Green

For:

- Support development in built up area
- Need more employment space
- Support employment here as already in this use and has good transport links

Against:

- Objections to further development of Croxley business park, always excessively traffic heavy at peak times.
- Need more infrastructure
- Objections to loss of Green Belt
- Question need for office space
- Objections to potential impact on Grand Union Canal, Croxley Common Moor (LNR) and SSSI.
- Alternative use for housing is preferred
- Objections to the 8m buffer not being sufficient and causing fragmentation of ecological network

CFS70b Croxley Business Park, Hatters Lane, Croxley Green

For:

- Support development in built up area
- Need more employment space
- Support employment here as already in this use

Against:

- Objections to further development of Croxley business park, always excessively traffic heavy at peak times.
- Need more infrastructure
- Objections to loss of Green Belt
- Question need for office space
- Objections to potential impact on Grand Union Canal, Croxley Common Moor (LNR) and SSSI.
- Alternative use for housing is preferred
- Objections to the 8m buffer not being sufficient and causing fragmentation of ecological network

Site CFS32a Land at Lynsters Farm, East of Old Uxbridge Road, Maple Cross

For:

- Brings employment to local area

- More employment space is needed within the area

Against:

- Impact on Green Belt land and no exceptional circumstances depicted for the sites removal from green belt.
- Should focus on brownfield land
- Potential flood risk
- Potential pollution and contamination (site is in SPZ1)
- Objections to potential impacts on wildlife
- Objections to the South-West Herts Economic Study (2019), it is out of date post COVID and does not take account of employment provision in Hillingdon or Bucks
- Objections to increased traffic congestion and highway safety issues
- Objections to development overshadowing a large part of New Lake
- Concern that this will be turned into residential use in the future.
- Objections to conclusions of the Sustainability Appraisal

Do you believe there are more suitable alternative sites to the potential employment sites (CFS32a, CFS70b, CFS70a)?

- A vacant building next to the Nissan Renault building.
- Land off Junction 1a M40 and maybe land to west of Maple Cross
- Town centre sites such as Rickmansworth
- Tolpits Lane
- Hertford Place, Maple Cross

Existing Employment Allocations (Appendix 3)

For:

- Support for the sites continued use for employment

Against:

- With regards to Maple Lodge, limitations should be placed on the classes of use, taking into account the proximity of residential areas and local wildlife sites

Education:

Do you think the Proposed Policy for Education Allocations is the right approach?

For:

- Support new school provision and need more secondary schools

Against:

- Increase existing sites
- Will add increased pressure on services and infrastructure
- Objections to building on Green Belt
- Is their evidence of need for increased child spaces.
- Objections to the policy being fragmented and does not consider the educational allocations of surrounding districts. For example, why does Carpenders Park need a further educational facility when it has very poor public transportation links?

CFS11 Carpenders Park Farm, Oxhey Lane

For:

- There is a clear need for educational places in the community so exceptions to construction in Green Belt could be granted

Against:

- Loss of Green Belt and conflicts with 5 purposes of the Green Belt
- Why was St James Altham closed and now proposed for housing?
- Not conducive for pupils to walk to school
- Objections to land adjacent to Woodland Trust land that's home to wildlife. Skylark is an endangered species and could be impacted
- Concerns over increase in traffic and congestion and safety of school children.
- No public transport in immediate area
- Loss of greenfield land and loss of community facilities/amenity for existing residents
- Flood concerns
- Unsuitable due to retirement village in close proximity
- Should prioritise brownfield sites

Do you believe there are more suitable alternative sites (to CFS11)?

- The proposed Sites Ref PCS47 or CFS52a in South Oxhey.
- Existing sites at Langlebury
- Former golf driving range on Prestwick Road.
- St James Altham site
- Little Furze school
- Moor Park
- St James Altham Swimming Pool
- Other areas not within the district
- Kebbell House

Warner Bro's Studio's:

Site CFS28 Land at Gypsy Lane, Hunton Bridge

For:

- Support the need for site to expand, and generation of employment.
- The economic and prestige of this facility outweighs the loss of land.
- Substantial development in and around the studios has already occurred.
- Support so long as effect on wildlife is kept to a minimum.

Against:

- Impacts on change of use of land on the Green Belt
- There is no justification for allowing Warner Bros (or any commercial enterprise) to have priority allocation.
- Area should be used for housing instead
- Pollution (including air and light) and impact on neighbouring amenity

Site OSPF6 Land west of Leavesden Aerodrome

For:

- Support the need for site to expand, and generation of employment.
- The economic and prestige of this facility outweighs the loss of land.
- Substantial development in and around the studios has already occurred.
- Support so long as effect on wildlife is kept to a minimum.

Against:

- Loss of Green Belt
- Objections to highway safety and increased traffic congestion
- Pollution (including air and light) and impact on neighbouring amenity
- Impacts on wildlife and biodiversity
- Increased pressure on services and infrastructure

Town Centres and Retail:

Do you agree with the preferred Town Centre Boundaries and Primary Shopping Areas for the proposed Town and District Centres?

For

- Support for general boundaries appear sensible and consistent with the current retail areas
- Local shopping and amenities need to be protected and enhanced for both the health and well being of the community and for the economy

Against

- Objections to continued protection of town centres and the need to be more flexible as physical shopping is in decline
- TRDC not doing enough to support small companies following the pandemic.
- Encouraging additional footfall to these areas without a resultant increase in infrastructure capacity would not be sustainable

Site R(a) Rickmansworth Town Centre

For

- Rickmansworth Shopping Area should include the Waitrose side. There is lack of big grocery stores in the area.

Against

- No thought is given to the regeneration of Rickmansworth town centre

Site R(b) South Oxhey District Centre

For

- Support for general boundaries which appear sensible and consistent with the current retail areas.

Against

Site R(c) Abbots Langley District Centre

For

- Support for general boundaries which appear sensible and consistent with the current retail areas.

Against

- N/A

Site R(d) Chorleywood District Centre

For

- Support for general boundaries which appear sensible and consistent with the current retail areas.

Against

- N/A

Site R(e) Watford Road, Croxley Green

For

- Support for general boundaries which appear sensible and consistent with the current retail areas.

Against

- The preferred retail locations in Croxley Green are separated by a short distance (along New Road) in which there are a number of other businesses. R(e) and R(g) could usefully be combined on a single map. Particularly as there are a number of other neighbourhood shopping areas within Croxley Green.

Site R(f) Moneyhill Parade, Rickmansworth

For

- Support for general boundaries which appear sensible and consistent with the current retail areas.

Against

- N/A

Site R(g) New Road, Croxley Green

For

- Support for general boundaries which appear sensible and consistent with the current retail areas.

Against

- The preferred retail locations in Croxley Green are separated by a short distance (along New Road) in which there are a number of other businesses. R(e) and R(g) could usefully be combined on a single map. Particularly as there are a number of other neighbourhood shopping areas within Croxley Green.

Open Space:

Do you think that retaining all of the existing open space allocations is the right approach?

For

- Support for retaining all existing open space allocations, and expanding upon them to preserve and protect the natural environment and biodiversity
- Social and well-being benefits
- Protect and expand allotment sites
- Use land for re-wilding.

Against

- The amount of open space per person needs to increase pro rata and there needs to be more generally
- Objection to taking Green Belt land and re-naming it as open space

General Open Space Comments

- Request to add the following area to public open space allocations: Land between Abbots Road and the M25 and between Toms Lane and the M25

Green Belt and Insetting of Bedmond:

Do you agree with the revised Green Belt boundary to inset Bedmond and the reasons why?

For

- Sensible approach and would still prevent urban sprawl
- Opportunities to build on garden land etc

Against

- Does not comply with 5 purposes of Green Belt
- Would impact on character of local area
- Will impact on wildlife and cause pollution
- Increased pressures on services and infrastructure and impact on traffic and congestion
- Objections to insetting as it would have a serious detriment to the local area and the wellbeing of its citizens
- Objection to future development in this small settlement in the Green Belt
- Confusion over what is meant by insetting of Bedmond
- Local roads are not substantial enough to cope with the increase in the proposed housing

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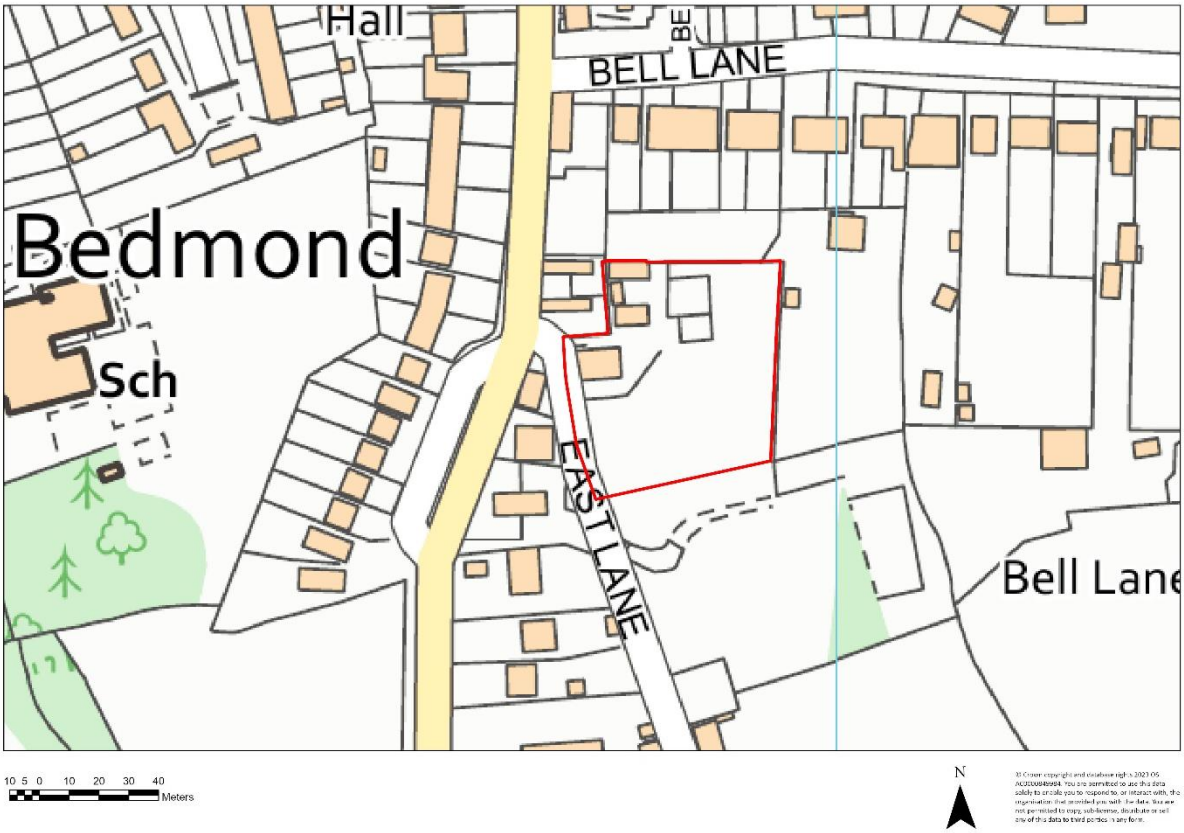
Site Ref	Address	Settlement	Site Area (ha)
NSS6a	North Cott East Lane	Bedmond	0.47



Site Description

The site is located along East Lane, to the south east of Bedmond. There is grassland across the majority of the site to the and south. At the east of the site, there is an area of hardstanding which contains several sheds and an equestrian ménage. Within the north-western portion of the site there is the private residential property and garden of Nott Cott. There is a gated entry into the site at the south-western corner. There are detached residential properties to the immediate north-west of the site and to the west, on the opposite side of East Lane. The north of the site borders residential gardens of properties along Bell Lane.

Site PCS25a is located within the site.

Use(s) Proposed	Residential

Planning History

There is no relevant planning history on the site.

Suitability

Policy Constraints:	
• Green Belt • Heritage Assets Listed Buildings • Conservation Area • Historic Park and Garden • AONB	• **Green Belt:** The site is located in the Green Belt. The site falls into two parcels which were assessed in the Stage 2 Green Belt Review. Harm to the Green Belt of releasing the parcel (in which the majority of the site is located) low-moderate. Harm to the Green Belt of releasing the parcels (in which the north-western corner of the site is located) was assessed as low. • **Historic Environment:** There are no heritage assets in the site although there are a number of Grade II and Locally Listed buildings along the High Street, to the north-west. The Heritage Impact Assessment states that any development of Site PCS25, which is located within the site, would have a neutral impact on the historic environment. A detailed impact assessment would still be required to identify and define mitigation strategies to protect the properties on the High Street.

	• **Archaeology:** 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.
Physical Constraints: • Access • Flood Zone • Surface Water Flooding • Groundwater Flooding • Groundwater Source Protection Zone (GSPZ) • Contamination • Noise • Air Quality	• **Flood Zone:** The site is in Flood Zone 1. • **Surface Water Flooding:** There is a small area at the east of the site at low-medium risk of surface water flooding. • **Access:** Access to the site is currently via a residential driveway to the north-west of the site off East Lane. There is also a gated entrance to the site at the south-west which could provide access from East Lane. HCC Highways advise access from East Lane is not suitable for any development, an access solution would be needed before any consideration and a shared surface solution would not be acceptable. It is also expected that enhanced crossing facilities of High Street would be needed. • **Groundwater Source Protection Zone (GSPZ):** The site is in SPZ1. Conditions which minimise risk to public water supply would likely be requested at a planning application stage.
Potential Environmental Impacts: • Landscape Character • Air Quality (AQMA) • Local Wildlife Site • Local Nature Reserve • SSSI • Ancient Woodland • Tree Preservation Order • Ancient/Veteran Tree	• The Landscape Sensitivity Assessment classifies as having low sensitivity to built development. • The Landscape Sensitivity Assessment classifies the site as having a low sensitivity to the historic character. • **Ecology:** HCC Ecology state a buffer should be provided to protect adjacent habitats.

Further Constraints/Considerations:

- HCC Ecology state illuminating trees should be avoided.
- HCC Minerals & Waste state encourage opportunistic extraction of minerals for use on site prior to non-mineral development. Any development must acknowledge and mitigate the impacts of the nearby waste facility, in the Design and Access Statement.
- HCC Highways have stated that Site PCS25, which is located within the site, presents significant concern that Local Transport Policy could be met due to the site's location.
- Settlement Hierarchy (Core Strategy, 2011): The site is partially within and partially adjacent to the village of Bedmond and the proposed inset area.
- HCC Mineral and Waste state that consideration must be given to the use of material on site through opportunistic extraction, in order to reduce the need for material to be imported. A Site Waste Management Plan (SWMP) may be required to support any proposal at the planning application stage.

Availability (ownership/legal issues)

The site is in single ownership and is being promoted by the landowner.

Achievability

The promoters of the site have not specified any issues regarding the viability in developing the site.

Potential Density

Landowner Proposed DPH	23	Landowner Proposed Dwelling Range	27
Indicative DPH	15-25	Indicative Dwelling Range	8-12

Phasing

0-5 years	x	6-10 years	x	11-15 years		16+ years	

Conclusion

The site is a mix of previously developed brownfield land and greenfield land located within the Green Belt and is therefore considered unsuitable for development. However, consideration will need to be given to the level of Green Belt harm acceptable to the council.

Development would be subject to appropriate mitigation measures to address the risk of surface water flooding to the east site, and subject to the resolution of appropriate access being provided. Development would also need to take into consideration the heritage assets within the vicinity of the site. Any development of the site would need to take account of the site's location in GSPZ1. The site is both available and achievable.					
Suitable	No	**Available**	Yes	**Achievable**	Yes

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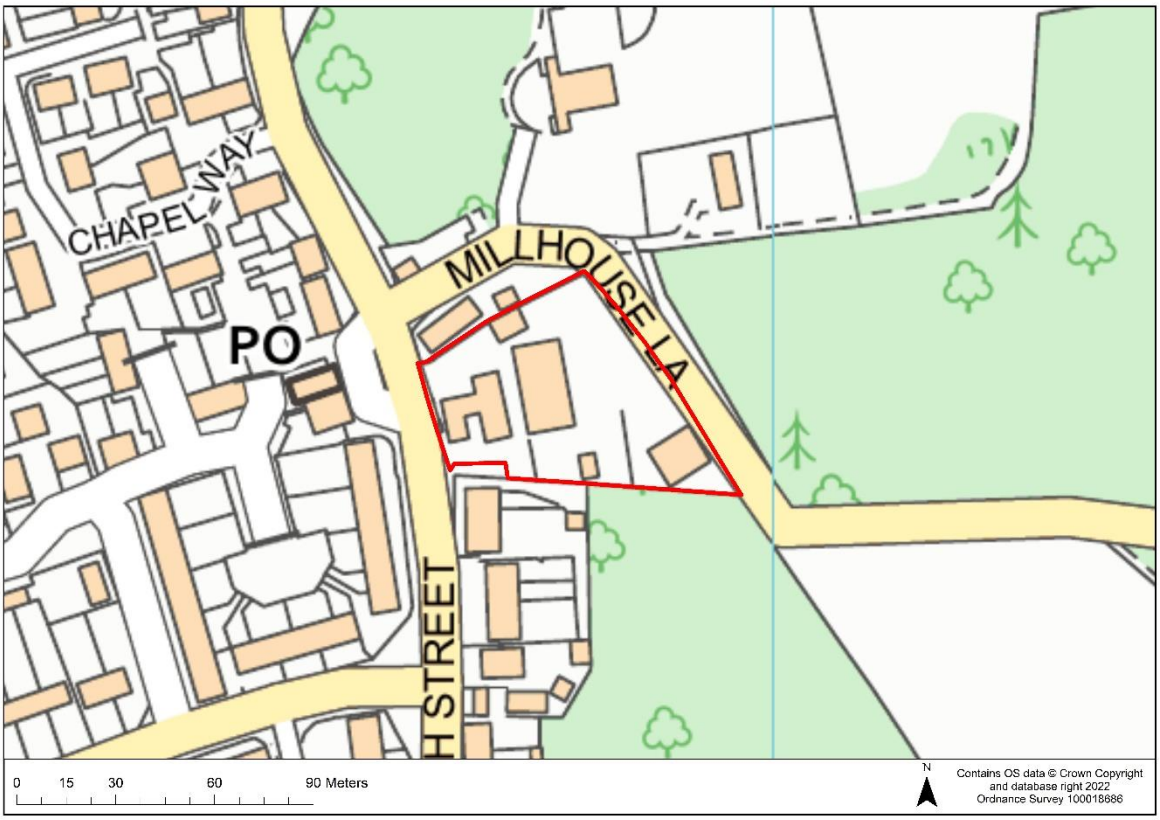
Site Ref	Address	Settlement	Site Area (ha)
NSS2	56 High Street, Bedmond	Bedmond	0.4



Site Description

The site is adjacent to the village of Bedmond. The site constitutes previously developed (brownfield) land and is in use as a car dealership, MOT centre and service station. Millhouse Lane runs along the eastern border of the site. There is residential development to the north along Millhouse Lane and south-west which abuts High Street. To the south-east there is a site comprised of woodland.

Use(s) Proposed	Residential with possible provision of Local Shops and Community uses (Dentist or Health Centre)

Planning History

There is no relevant planning history on the site.

Suitability

Policy Constraints: • Green Belt • Heritage Assets Listed Buildings • Conservation Area • Historic Park and Garden • AONB	• **Green Belt:** The site is located in the Green Belt. The site falls into two Green Belt parcels which were assessed in the Stage 2 Green Belt Review. Harm to the Green Belt of releasing the wider parcel (in which majority of the site is located) was assessed as low harm. Harm to the Green Belt of releasing the parcel in which a small area at the south eastern part of the site is located was assessed as moderate harm. • **Historic Environment:** There are no heritage assets within the site boundary, although there are two Grade II Listed Buildings to the north and south of the site. In addition. There are also Locally Listed Buildings located to the south, on High Street.
Physical Constraints: • Access • Flood Zone • Surface Water Flooding • Groundwater Flooding • Groundwater Source Protection Zone (GSPZ) • Contamination	• **Flood Zone:** The site is in Flood Zone 1. • **Surface Water Flood Risk:** To the south of the site, there is an area at risk of surface water flooding, which ranges from low to high Surface Water Flood Risk. To the north-west of the site, there is a small area at low Surface Water Flood Risk. • **Groundwater Flood Risk:** Groundwater levels of the site are at least 5m below the ground surface.

• Noise • Air Quality	• **Groundwater Source Protection Zone (GSPZ):** The site is in SPZ1. Conditions which minimise risk to public water supply would likely be requested at a planning application stage. • **Access:** There is an existing vehicular access provision from High Street on the eastern boundary. • **Noise:** The site is located within close proximity to the M25.
Potential Environmental Impacts: • Landscape Character • Air Quality (AQMA) • Local Wildlife Site • Local Nature Reserve • SSSI • Ancient Woodland • Tree Preservation Order • Ancient/Veteran Tree	• The Landscape Sensitivity Assessment classifies the site as having a medium-low sensitivity to built development**.** • The Landscape Sensitivity Assessment classifies the site as having a low sensitivity to the historic character. • **Tree Preservation Order:** There are Tree Preservation Orders along the south of the site (TPO371).

Further Constraints/Considerations:

- HCC Ecology state the ancient woodland to the east and woodland to the south should not be illuminated.
- *Settlement Hierarchy (Core Strategy, 2011):* The site is located in the Bedmond, which is defined as a 'village' in the Settlement Hierarchy. The site is located within the area proposed for insetting in Bedmond.
- The site supports a local business and development would result in a loss of employment floorspace, unless re-provisioned.
- Promoters of the site are promoting the site with potential for the provision of local shops and a community use as a health centre or dentist although viability evidence would likely be needed to demonstrate that this is achievable.
- HCC Mineral and Waste state that consideration must be given to the use of material on site through opportunistic extraction, in order to reduce the need for material to be imported. A Site Waste Management Plan (SWMP) may be required to support any proposal at the planning application stage.

Availability (ownership/legal issues)

The site is in single ownership and the site is being promoted by the landowner.

Achievability

The promoters of the site have not specified any issues regarding the viability in developing the site.

Potential Density

Landowner Proposed DPH	50	Landowner Proposed Dwelling Range	20
Indicative DPH	30-50	Indicative Dwelling Range	12-20

Phasing

0-5 years	x	6-10 years	x	11-15 years		16+ years	

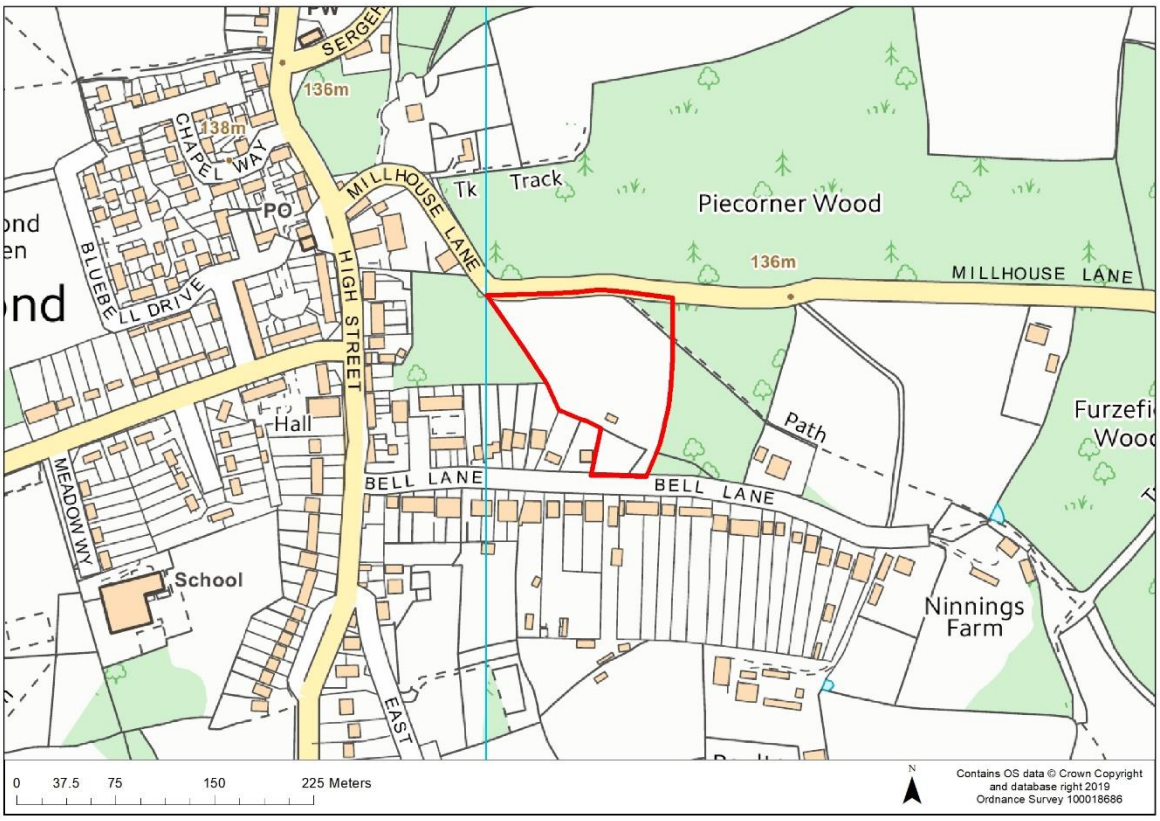
Conclusion

The site is a brownfield site located within the proposed inset area of Bedmond and is therefore considered suitable for development.

Development would need to take into consideration the heritage assets adjacent to the site. Any development of the site would need to take account of the site's location in GSPZ1. The site is both available and achievable.

Suitable	Yes	**Available**	Yes	**Achievable**	Yes

Site Ref	Address	Settlement	Site Area (ha)
CFS10	Land between Millhouse Lane and Bell Lane, Bedmond	Bedmond	1.2



Site Description

The site is located in Bedmond and lies between Millhouse Lane and Bell Lane. The site is comprised of greenfield land which is in use as open grassland and woodland along the western boundary. There is access to the site from Bell Lane. The site is mostly surrounded by woodland with residential development to the south along Bell Lane.

Use(s) Proposed	Residential (bungalows for the elderly)

Planning History

There was a planning application for the erection of four stables in 2016 (16/0149/FUL), which was withdrawn. An application in 2005 for the erection of three dwellings was refused (05/0998/FUL).

Suitability

Policy Constraints: • Green Belt • Heritage Assets Listed Buildings • Conservation Area • Historic Park and Garden • AONB	• **Green Belt:** 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 majority of the site is located) as moderate. The harm of releasing the parcel in which a small area of the site located to the south (Site OSPF2) is assessed as low. • **Historic Environment:** There are Listed Buildings and Locally Listed Buildings to the east, along High Street. The Heritage Impact Assessment considers that the woodland to the east of Site CFS10 would provide a visual barrier between the site and the Listed Buildings. The Heritage Impact Assessment states that the site's development would have a minor adverse impact on the historic environment. • **Archaeology:** 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.
Physical Constraints:	• **Flood Zone:** The site is in Flood Zone 1.

• Access • Flood Zone • Surface Water Flooding • Groundwater Flooding • Groundwater Source Protection Zone (GSPZ) • Contamination • Noise • Air Quality	• **Access:** There is existing vehicular access from Bell Lane, which is an unmade private road varying widths of between 3.1 and 5 metres providing access to approximately 40 dwellings. The road is roughly surfaced. Depending on the scale of development, improvements to Bell Lane would be required.
Potential Environmental Impacts: • Landscape Character • Air Quality (AQMA) • Local Wildlife Site • Local Nature Reserve • SSSI • Ancient Woodland • Tree Preservation Order • Ancient/Veteran Tree	• The Landscape Sensitivity Assessment classifies the site as having a medium-low sensitivity to built development. • **TPO:** There are protected trees along the western boundary of the site (TPO371 and TPO657). • **Ecology:** Hertfordshire County Council Ecology state that the site has a locally high ecological sensitivity due to the presence of the Local Wildlife Site (Piecorner Wood, located to the north).

Further Constraints/Considerations:

- HCC Highways have stated that the site presents significant concern that Local Transport Policy could be met due to the site's location.
- *Settlement Hierarchy (Core Strategy, 2011):* The site is located partially within and partially at the edge of the village of Bedmond and the proposed inset area of the village.

Availability (ownership/legal issues)

The site is in single ownership and the site is being promoted by the landowner.

Achievability

The promoters of the site have not specified any issues regarding the viability in developing the site.

Potential Density

Landowner Proposed DPH	20	Landowner Proposed Dwelling Range	24
Indicative DPH	20-35	Indicative Dwelling Range	25-43

Phasing

0-5 years	x	6-10 years		11-15 years		16+ years	

Conclusion

The site is in the greenbelt and is therefore considered unsuitable for development. However, consideration would need to be given to the level of green belt harm acceptable to the council.

Residential development would besubject to highway improvements to Bell Lane. Development would need to ensure the protection of any protected trees within the site. The site is both available and achievable.

Suitable	No	**Available**	Yes	**Achievable**	Yes