



Local Plan

Summary of the Three Rivers' Local Plan Newly Submitted Sites and New Policies (Part 5) Regulation 18 Consultation

November 2025

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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 July 2025, TRDC undertook the “Three Rivers’ Local Plan Regulation 18 Newly Submitted Sites and New Policies Consultation”.
- 1.3 This statement summarises the 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 2025 consultation, TRDC undertook four 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
 - Local Plan “Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land” (Part 4)

3.0 Three Rivers’ Local Plan Newly Submitted Sites and New Policies (Part 5) 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 Wednesday 16 July 2025 for a period of six weeks, ending on Sunday 31 August 2025. Emails were sent to almost 1300 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. 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 7448 formal responses were received from 592 respondents (53 Statutory and Non-Statutory Consultees, 17 Landowners/Developers and 522 general public) through the sites section of the consultation. A total of 449 formal responses were received from 73 respondents (19 Statutory and Non-Statutory Consultees, 5 Landowners/Developers and 49 general public) through the policy section of the consultation. Respondents included residents, statutory and non-statutory consultees and other interested groups and organisations. 984 responses were received by post or email and 6,464 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 Figures 1 and 2 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.

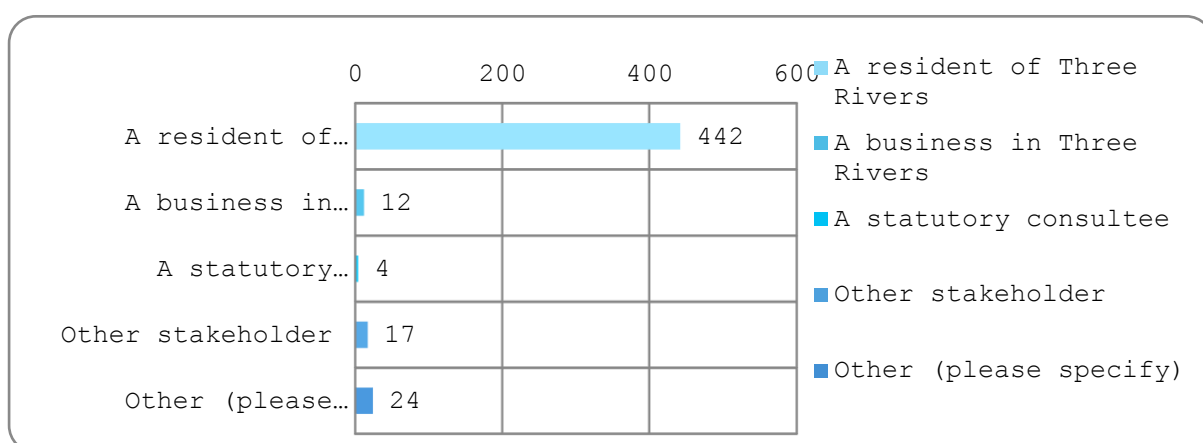


Figure 1. Sites: Summary of "about me" section within the Have Your Say platform

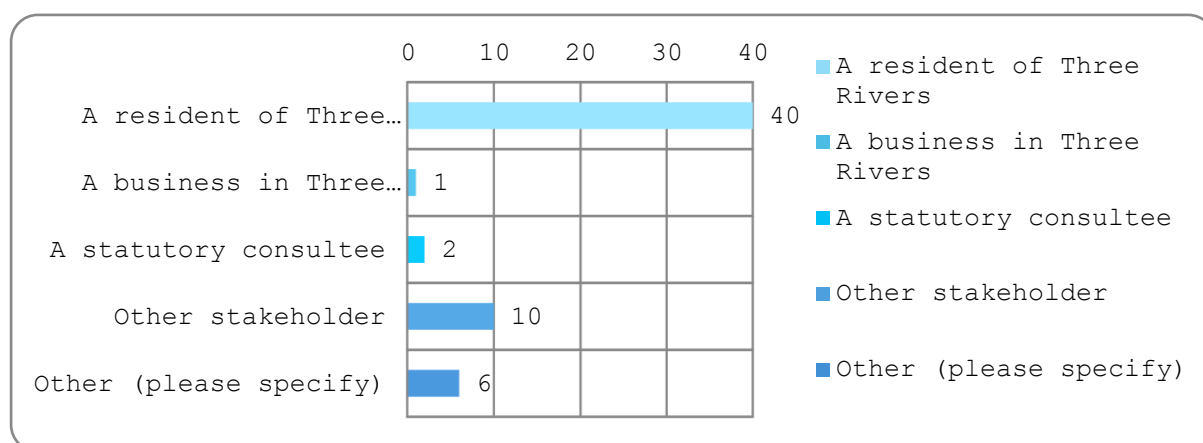


Figure 2. Policies: Summary of "about me" section within the Have Your Say platform

3.5.2 In terms of age, respondents (from Have Your Say) by decade born shows a large generational disparity between respondents (see Figures 3 and 4 below). Well over half of all public responses (from Have Your Say) came from those born prior to 1970 and as few as 23 came from those born from 1990 onwards. For the sites section of the consultation, the largest group was those born between 1950 and 1959 with a total of 117. For the policies section of the consultation, the largest group was those born between 1960 and 1969 with a total of 21. It is evident from Figures 2 and 3 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.

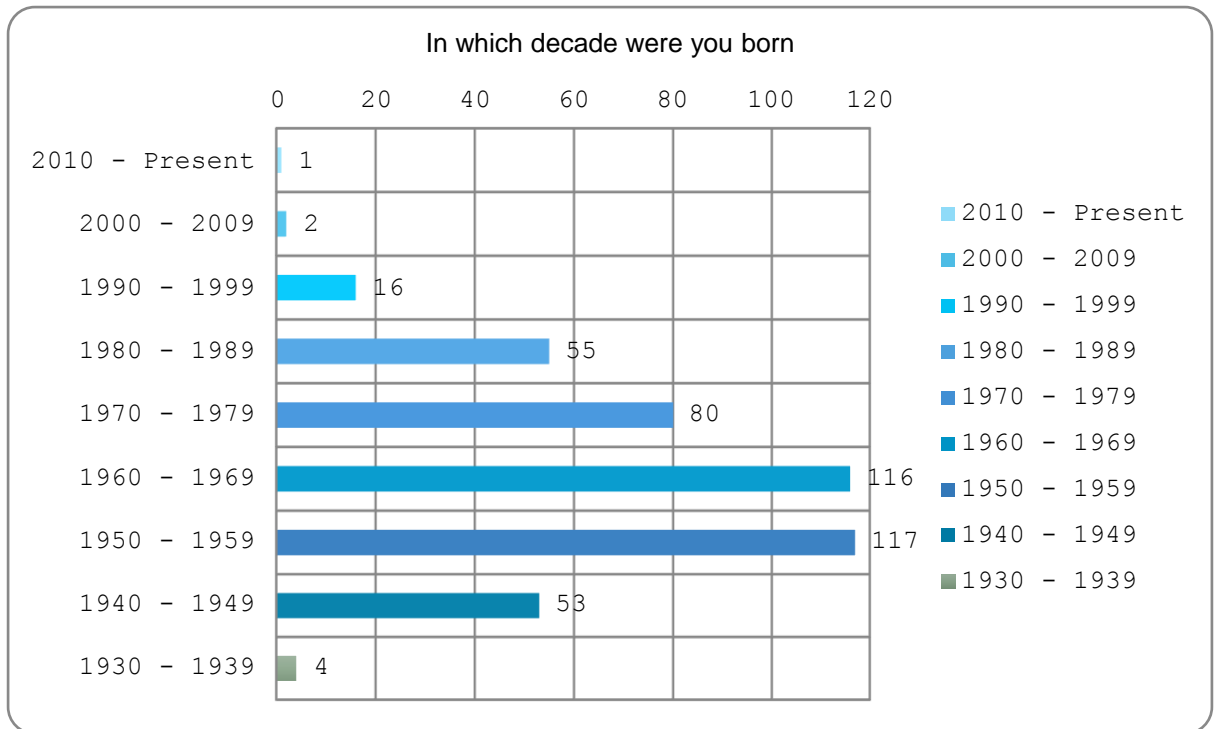


Figure 3. Sites: Summary of the decades in which the Have Your Say respondents were born

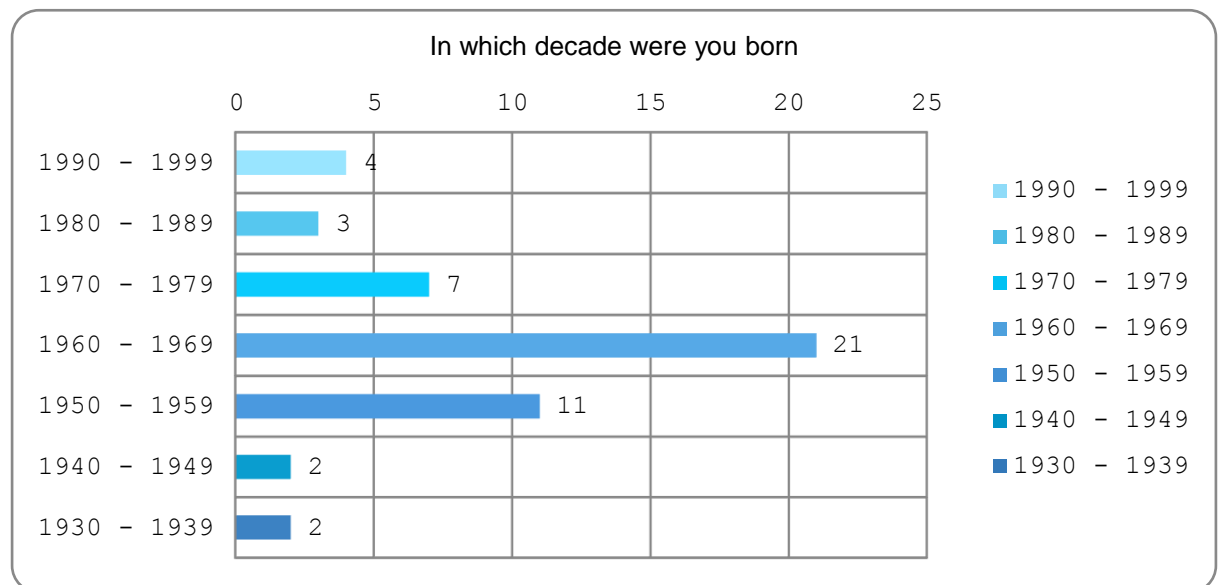


Figure 4. Policies: Summary of the decades in which the Have Your Say respondents were born

3.5.3 In terms of gender, the majority of respondents identified as a man, while there were 15 fewer responses for the Sites section and 6 fewer responses for the Policies section from those who identified as a woman (see Figure 5 and 6 below).

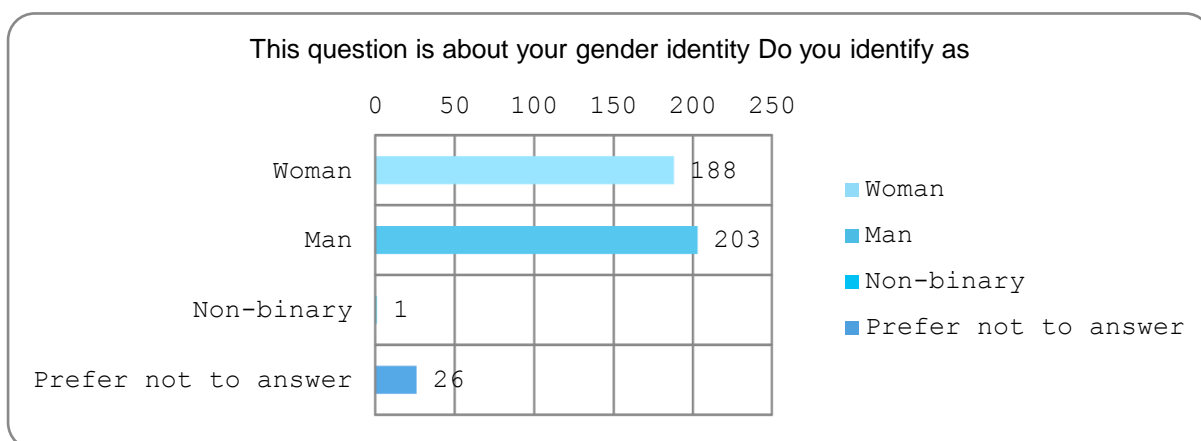


Figure 5. Sites: Summary of the gender identity of the Have Your Say respondents

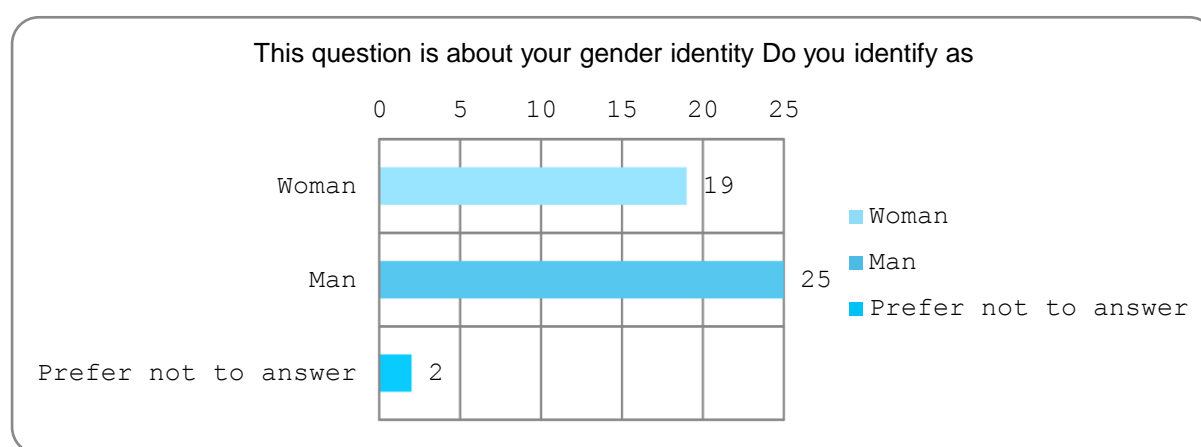


Figure 6. Policies: Summary of the gender identity of the Have Your Say respondents

3.5.4 In terms of ethnicity (see Figure 7 and 8 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 32 respondents for sites and 1 for policies. 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>

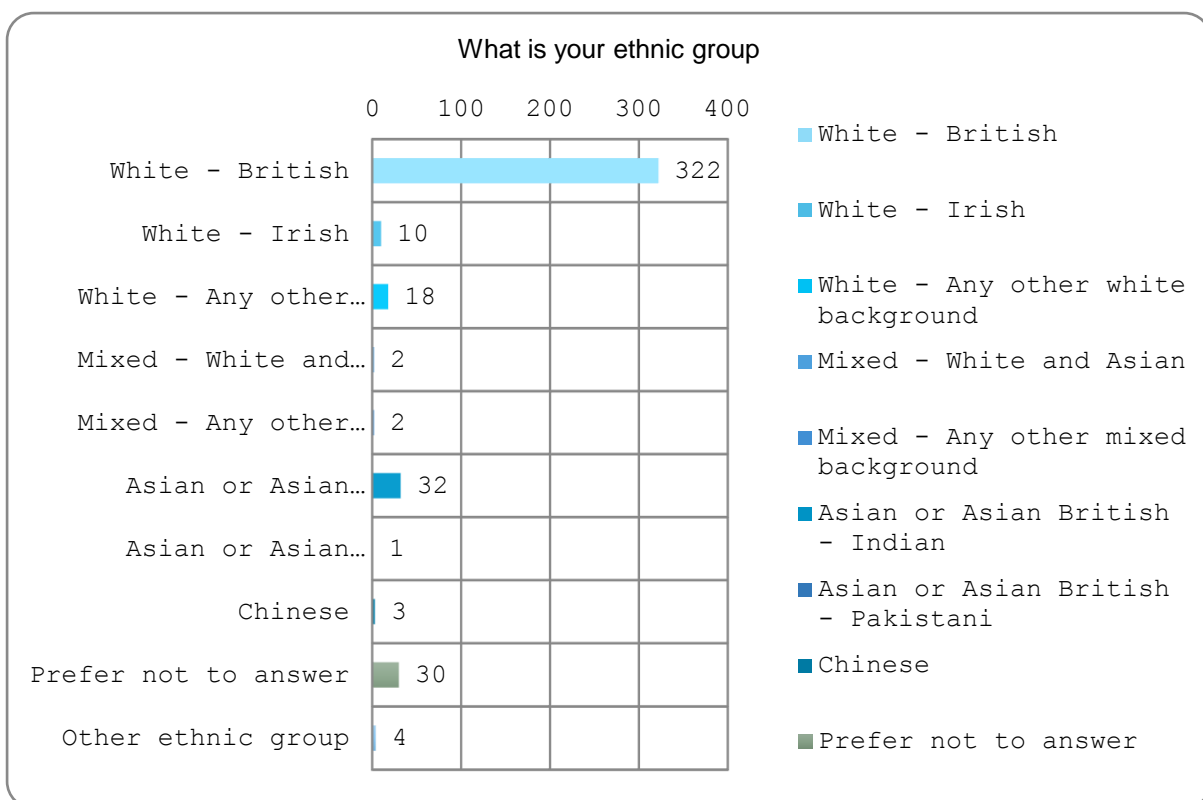


Figure 7. Sites: Summary of the ethnicity of the Have Your Say respondents

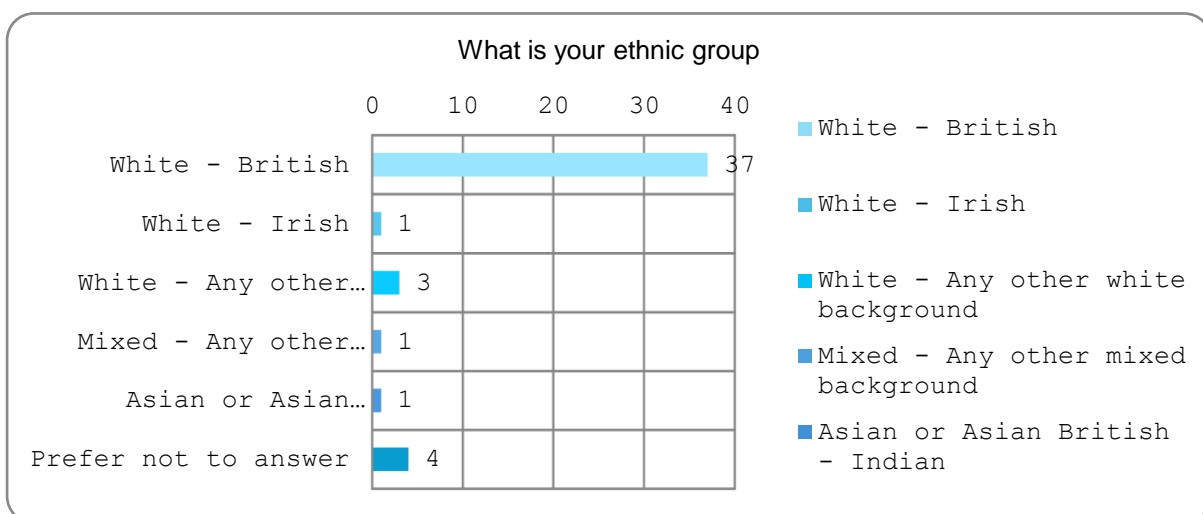


Figure 8. Policies: Summary of the ethnicity of the Have Your Say respondents

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 9 below, the area with the largest number of responses was Chorleywood, with a total of 135. Rickmansworth and Carpenders Park also provided a high number of responses with 86 and 99 respectively. A total of 58 responses originated from outside of the district.

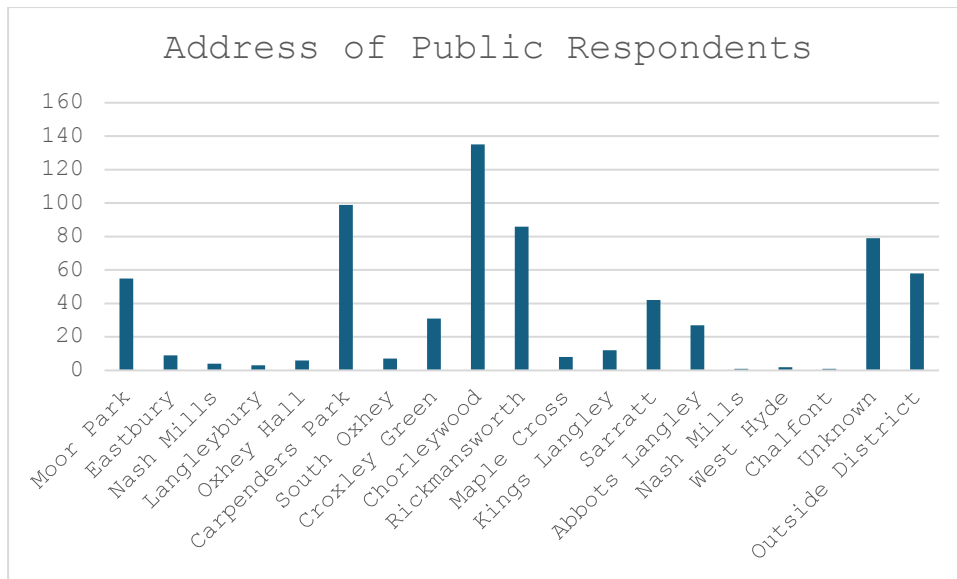


Figure 9: Summary of addresses of all respondents (Have Your Say platform, emails and letters combined)

3.6 Statutory Consultee Responses

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 Services operators including National Grid Electricity Transmission (NGET), Affinity Water and Thames Water made representations to the consultation. Thames Water made comments regarding the net zero policies. In response to Policy XB, the organisation questioned if 'regulated energy' included process energy used for treating and distributing water and wastewater and that it should be clear that the policy is not intended for process buildings. For Policy XC it was noted that achieving BREEAM 'Excellent' rating for process buildings is unlikely to be appropriate and may result in unnecessary design complexity or costs. Policy XD and specifically the embodied carbon limit is unlikely to be achievable for critical infrastructure projects. Similarly, Policy XE and feasibility assessments for demolition could have significant implications for the delivery of infrastructure upgrades.

3.6.2.1 Services operators including Affinity Water and National Grid provided general comments. Affinity Water listed sites PCS21 Love Lane and H22 Stockers Farm Road which are potentially being allocated in Regulation 19. It is noted that there should be appropriate revisions to both site boundaries and their potential yield. It is also suggested that Eastbury Pumping Station be included as part of a wider parcel including CFS67 and EOS11.0. National Grid stated that sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ.

3.6.3 Harrow and Buckinghamshire Councils provided comments on the Part 5 Regulation 18 consultation.

3.6.3.1 Buckinghamshire Council raised no concerns relating to the consultation, stating that TRDC's assessment of site suitability is noted, as is the position with regards outstanding evidence on the likely impacts and mitigations for sites, and therefore as this work could change the conclusion on the sites which are close to the boundary with Buckinghamshire, the Council reserves its position on them.

3.6.3.2 Harrow Council made comments regarding sites NCFS12 Land East of Oxhey Lane and NCFS22 Nine of Herts Golf Club. The Council objects to NCFS12 due to its impact on the Green Belt, its impacts upon Hatch End and surrounding infrastructure. It is recommended that TRDC ensures compliance with the NPPF Green Belt policy in order to demonstrate that exceptional circumstances apply to justify the release of sites such as NCFS12. Similarly, Harrow Council objects to NCFS22 due to impact on Green Belt, overdevelopment of the area and in an unsustainable location.

3.6.4 Four Parish Councils from within Three Rivers provided comments including Abbots Langley Parish Council, Sarratt Parish Council, Chorleywood Parish Council and Watford Rural Parish Council. A further two Parish Councils from outside of the district also provided comments to the consultation including Flaunden Parish Council and Chalfont St Peter Parish Council. Chorleywood Parish Council and Sarratt Parish Council both responded to the policies section of the consultation. Chorleywood Parish Council generally supports all of the policies and suggests that sites with protected species should require plans to demonstrate how the habitat of those species will be protected and that Policy XE could be simplified for regular householders. Sarratt Parish Council also generally supports the Biodiversity Policy and the Net Zero Policies and suggest further options for offsite Biodiversity net-gain and in response to Policy XA suggested the use of A6 Smart Energy Systems in relation to medium and large developments.

3.6.4.1 With regards to comments on specific sites, Abbots Langley Parish Council provided comments on **NCFS1 Chequers House, Chequers Lane, NCFS2 Fortunes Farm and NCFS3 The Old Dairy, Chequers Lane**. The Parish Council agree that these sites are not suitable for development. Some of the concerns for the sites included:

- Concerns about urban sprawl and encroachment onto the Green Belt
- Concerns about harming the character and setting of Abbots Langley
- Sustainability and quality of supporting infrastructure
- Proposed schools negatively affecting the catchment area of Abbots Langley
- Loss of greenspace
- Lack of sustainable transport options
- Impact on historic and protected hedgerows
- Impact on local biodiversity
- Lack of clear association with the existing urban core

3.6.4.2 Abbots Langley Parish Council also provided comments on **NCFS4 High Elms Manor, NCFS6 Land to the East of Watford Road, NCFS8 Land off St Albans Lane, NCFS9 Land to the North-West of Woodstock, NCFS10 Great Westwood Equestrian Park, NCFS19 Land Adjacent to 60 Harthall Lane and NCFS20 Lonsdale, Hyde Lane**. The Parish Council strongly objected to these sites due to the following reasons:

- Impact on heritage assets with the site's proximity to High Elms Manor (NCFS4)
- Impact on ancient woodland
- Potential loss of a public footpath
- Concerns about urban sprawl and encroachment onto the Green Belt
- Concerns on highway access and increased congestion
- Impact on local biodiversity
- Flood Risk (NCFS6)
- Impact on the historic local character

- Contamination risk (NCFS10)

3.6.4.3 Sarratt Parish Council stated Croxley Green Parish Council provided comments on **NCFS27 Green End Farm, NCFS28 Ravenswood, NCFS29 New Model Farm and NCFS30 Sarratt Lodge**. The Parish Council agree that these sites are not suitable for development. The concerns relating to these sites included:

- Housing needs have already been met through approved developments in Sarratt
- No sustainable transport options
- Impact on AONB and Church End Conservation Area
- Concerns about urban sprawl and encroachment onto the Green Belt
- Edge of settlement
- Land locked (NCFS29)
- Archaeological significance
- Local historic character and heritage

3.6.4.4 Sarratt Parish Council also provided comments on **NCFS31 Land to the South-East of Poles Hill, NCFS32 Land to the South-West of Bragmans Lane, NCFS10 Great Westwood Equestrian Park, NCFS17 North Hill Farm, NCFS36 Land North of Little Green Lane and NCFS18 Land to the East of Sarratt Lane**. The Parish Council strongly objected to these sites due to the following reasons:

- Unrealistic density (NCFS31, NCFS32)
- Impact on ancient woodland
- Potential loss of public footpath (NCFS31, NCFS32, NCFS18)
- Surface water flooding (NCFS31, NCFS10)
- Overdevelopment of Belsize (NCFS31, NCFS32)
- Impact on local character and heritage
- No sustainable transport options
- Requirement of a SANG (NCFS31, NCFS32)
- Edge of settlement
- Impact on local biodiversity
- Concerns over highways, congestion and access

3.6.4.5 Chorleywood Parish Council provided comments on **NCFS13 Catlips Farm, NCFS14 Land at Homefield Road and NCFS16 Stag Lane**. The Parish Council objected to these sites due to the following reasons:

- Inappropriate development in the Green Belt
- Concerns over highways, congestion and access
- Poor access to amenities
- Loss of Public Right of Way (NCFS13, NCFS16)
- Proximity to conservation area (NCFS13, NCFS14)
- Protected woodland (NCFS13, NCFS16)
- Proximity to M25 (NCFS13)
- Sewage and wastewater infrastructure
- Affordable housing provision
- Loss of community facility (NCFS14, NCFS16)
- Location within Local Wildlife Site (NCFS16)

3.6.4.6 Chorleywood Parish Council also provided comments on **NCFS15 Chorleywood Library** and **NCFS17 North Hill Farm**. The Parish Council generally supported these sites but had the following concerns:

- NCFS15 Chorleywood Library:
- It should be guaranteed that a new library of equal size and facility is provided as well as continuity of the service temporarily while construction is taking place
- Sufficient parking should be provided and for any development to be sympathetic to its surroundings within the Chorleywood Conservation Area
- NCFS17 North Hill Farm:
- Development should be restricted to the existing developed elements of the site and a new access onto the site created to avoid traffic exiting directly onto North Hill
- Development should be sympathetic to the conservation area and Chilterns National Landscape
- A full ecological assessment should be required, clarity provided over sewage management and a supply of 50% of the site being affordable housing

3.6.4.7 Watford Rural Parish objected to site NCFS12 Land East of Oxhey Lane. Concerns included:

- Green Belt harm and encroachment into open countryside
- Highway safety and inadequate infrastructure
- Flood risk and water management
- Impact on biodiversity and landscape character
- Unsustainable location and accessibility

3.6.4.8 Chalfont St Peter Parish Council objected to site **NCFS13 Catlips Farm**, **NCFS24 The Island, Land off Church Street** and **NCFS35 Land South of Chalfont Lane** citing development in the Green Belt and insufficient sewage capacity. The Parish Council also opposed NCFS15 Chorleywood Library due to the potential loss of a community facility.

3.6.4.9 Flaunden Parish Council objected to sites **NCFS31 Land to the South-East of Poles Hill** and **NCFS32 Land to the South-West of Bragmans Lane** citing loss of Green Belt, access, congestion, lack of sustainable transport, local character and biodiversity.

3.6.5 A number of Hertfordshire County Council departments provided their comments during the consultation. The comments were generally neutral with the inclusion of a number of recommendations for both policies and sites. A summary can be seen below.

HCC Ecology

Regarding the Biodiversity Policy, HCC Ecology suggest that TRDC should follow the government's templates for Biodiversity Net Gain (BNG) and Habitat Management and Monitoring Plan (HMMP) in order to reduce friction during the planning process. In terms of the Chilterns Beechwood (SAC), it is suggested that the measures are legally secured with any legal agreement including step in rights.

HCC Ecology also made comments on specific sites. For sites NCFS1 Chequers House, Chequers Lane, NCFS2 Fortunes Farm, NCFS3 The Old Dairy, Chequers Lane, NCFS8 Land off St Albans Lane, NCFS9 Land to the North-West of Woodstock, NCFS7 Waterdell, NCFS14 Land at Homefield Road, NCFS15

Chorleywood Library, NCFS17 North Hill Farm, NCFS21 Land South of Scots Hill, NCFS19 Land Adjacent to 60 Harthall Lane, NCFS23 Primrose Lodge, London Road, NCFS25 The Vicarage, Bury Lane, NCFS26 Meresworth Care Home, Field Way, NCFS27 Green End Farm, NCFS28 Ravenswood, NCFS29 New Model Farm and NCFS30 Sarratt Lodge it was noted that there are no ecology sites within or adjacent but an ecological appraisal is recommended. More specific comments were made for the remaining sites. These are listed below:

- NCFS4 High Elms Manor – Local Wildlife Site: Garston Manor Grassland is located within the site, and a preliminary ecological appraisal is recommended
- NCFS6 Land to the East of Watford Road - Local Wildlife Site: Grand Union Canal/River Gade Manor Grassland is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS31 Land to the South-East of Poles Hill - Local Wildlife Site: Dabardine and Plough Woods is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS32 Land to the South-West of Bragmans Lane - Local Wildlife Site: Rosehall Wood is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS10 Great Westwood Equestrian Park - Local Wildlife Site: Ancient woodland Sherwoods Park is located within the site, Sherwoods Wood and Margeholes Wood are adjacent to the site, and a preliminary ecological appraisal is recommended
- NCFS11 Grange Wood - Local Wildlife Site: Grand Union Canal/River Gade Manor Grassland is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS12 Land East of Oxhey Lane - Local Wildlife Site: Hartsbourne Flood Defence Area is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS13 Catlips Farm - Local Wildlife Site: Pheasant's Wood is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS16 Land at Stag Lane - Local Wildlife Site: Wearing's Field is located within and in close proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS36 Land North of Little Green Lane - Local Wildlife Site: Dell Wood, Round Newlan's & Long Newland's Springs is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS20 Lonsdale, Hyde Lane - Local Wildlife Site: Pimlico House Woods & New Plantation is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS18 Land to the East of Sarratt - Local Wildlife Site: Long Spring and Upper Plantation is located within proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS22 Nine of Herts Golf Club - Local Wildlife Site: Bishop's Wood is located within proximity of the site, and a preliminary ecological appraisal is recommended

- NCFS24 The Island, Land off Church Street – Croxley Hall Lakes is located within and in close proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS34 Pinewood Lodge – Oxhey Woods is located within and in proximity of the site, and a preliminary ecological appraisal is recommended
- NCFS35 Land South of Chalfont Lane – Colne Valley Gravel Pits is located within and in proximity of the site, and a preliminary ecological appraisal is recommended

HCC Design and Construction Delivery

Regarding Policy XA, HCC Design and Construction Delivery suggest a water focussed, post occupancy evaluation policy as well as the encouragement of rainwater harvesting. Policy XB is generally supported but the effectiveness could be improved by stating specifically the methodology that applicants will be expected to utilise when demonstrating policy criterion 11. Policy XC is generally supported but it was suggested that for policy criterion 3 alternatives for BREEAM could be considered such as Leadership in Environmental and Energy and Environmental Design or the Homes Quality Mark (HQM).

HCC Property Planning

HCC Property Planning did not comment on any policies and generally supported some of the sites. Regarding NCFS15 Chorleywood Library, development was supported as long as it includes retention of the library and NCFS Pinewood Lodge should also include the playing field to the north east of the site as part of any development. It was however noted regarding NCFS26 Meresworth Care Home that the site is under offer to a purchaser and should therefore be removed.

HCC Transport

Multiple comments were made regarding sites. For sites NCFS1 Chequers House, Chequers Lane, NCFS2 Fortunes Farm, NCFS3 The Old Dairy, Chequers Lane, NCFS4 High Elms Manor, NCFS8 Land off St Albans Lane, NCFS9 Land to the North-West of Woodstock, NCFS19 Land Adjacent to 60 Harthall Lane, NCFS20 Lonsdale, Hyde Lane, NCFS27 Green End Farm, NCFS28 Ravenswood and NCFS29 New Model Farm there are concerns that there is little opportunity for enhancement of adjacent highways and no proposed Local Walking & Cycling Infrastructure Plans or Growth & Transport Plans that would benefit the site. More specific concerns were raised for the remaining sites. These are listed below:

- NCFS6 Land to the East of Watford Road – The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its unsustainable location and any proposed vehicular access from the A41 would conflict with policy
- NCFS31 Land to the South-East of Poles Hill – - The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its unsustainable location
- NCFS32 Land to the North-West of Bragmans Lane - The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its

unsustainable location and should evidence an HCC LTP4 compliant access strategy prior to allocation

- NCFS7 Waterdell - The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its unsustainable location, there are challenges securing deliverable access to the site unless the site forms part of a cross boundary scheme and non-priority route 18 on North Orbital Road is a local scheme that has been identified as well as cycle improvements through Chiswell Green
- NCFS10 - The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its unsustainable location and delivering access from the M25 is unlikely
- NCFS11 Grange Wood – If allocated then local plan policies will be expected to secure improvements to local sustainable transport provision and the site should evidence an HCC LTP4 compliant access strategy
- NCFS12 Land East of Oxhey Lane – If allocated then local plan policies will be expected to secure improvements to local sustainable transport provision, the site should evidence an HCC LTP4 compliant access strategy and non-priority route 13 and PR40_SW is a local scheme that has been identified
- NCFS13 Catlips Farm – The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its unsustainable location; there is little opportunity to improve unsuitable roads adjacent to the site and cycle route 14 is a priority scheme located close to the site
- NCFS14 Land at Homefield Road and NCFS15 Chorleywood Library – Cycle route 8 is a priority scheme located close to the sites
- NCFS16 Land at Stag Lane - The site is unlikely to meet Hertfordshire County Council's Local Transport Plan policies due to its unsustainable location; there is little opportunity to improve unsuitable roads adjacent to the site and cycle route 8 is a priority scheme located close to the site
- NCFS17 North Hill Farm – The site should evidence an HCC LTP4 compliant access strategy prior to allocation and cycle route 8 is a priority scheme close to the site
- NCFS21 Land South of Scots Hill – It is yet to be evidenced how a suitable access into the site and wider connectivity can be achieved, there are concerns that pedestrian and cycle access to local facilities can be achieved, prior to allocation an HCC LTP4 compliant strategy will need to be agree with highways and priority cycle route 2 is close to the site
- NCFS36 Land North of Little Green Lane – there is little opportunity to improve unsuitable access, the site should evidence an HCC LTP4 compliant access strategy and cycle route 18 is a priority scheme located close to the site
- NCFS18 Land to the East of Sarratt Lane - There is little opportunity to improve unsuitable roads adjacent to the site, there are major issues when considering alignment to national policy and HCC Local Transport Plan policies in terms of reducing the need to travel and promoting sustainable travel options and cycle route 8 is a priority scheme located close to the site
- NCFS22 Nine of Herts Golf Club and NCFS23 Primrose Lodge, London Road - There are major issues when considering alignment to national policy and

HCC Local Transport Plan policies in terms of reducing the need to travel and promoting sustainable travel options and cycle route 19 is a priority scheme located close to the site

- NCFS24 The Island, land off Church Street – There are concerns regarding the safety of any proposed internal movements, an HCC LTP4 compliant strategy will need to be agreed with highways and priority routes 2,3,8 and non priority routes 1,4 and 16 are located close to the site
- NCFS25 The Vicarage, Bury Lane - Priority routes 2,3,8 and non priority routes 1,4 and 16 are located close to the site
- NCFS26 Meresworth Care Home, Field Way – priority cycle routes 3 and 14 are located close to the site
- NCFS34 Pinewood Lodge – priority cycle routes 13 and 17 are located close to the site
- NCFS35 Land South of Chalfont Lane - There are major issues when considering alignment to national policy and HCC Local Transport Plan policies in terms of reducing the need to travel and promoting sustainable travel options and there are no proposed schemes identified close to the site

HCC Historic Environment

HCC Historic Environment made comments regarding specific sites. It is noted that site NCFS4 High Elms Manor is considered to not be suitable due to its location within the grounds of High Elms Manor. Sites NCFS14 Land at Homefield Road and NCFS15 Chorleywood Library are considered to have no impact on heritage assets. An archaeological assessment is recommended for the remaining sites.

HCC LLFA

Recommendations for flood risk mitigation are made for sites NCFS6 Land to the East of Watford Road, NCFS31 Land to the South-East of Poles Hill, NCFS7 Waterdell, NCFS11 Grange Wood, NCFS12 Land East of Oxhey Lane, NCFS14 Land at Homefield Road, NCFS15 Chorleywood Library, NCFS19 Land Adjacent to 60 Harthall Lane, NCFS22 Nine of Herts Golf Club, NCFS23 Primrose Lodge, London Road, NCFS26 Meresworth Care Home, Field Way, NCFS34 Pinewood Lodge and NCFS35 Land South of Chalfont Lane. A sequential approach is critical for the western parcel of NCFS10 Great Westwood Equestrian Park while the site is not objected to in principle. NCFS24 The Island, land off Church Street and NCFS25 The Vicarage, Bury Lane are both objected to due to fluvial and groundwater flood risk. There was no objection to the remaining sites.

HCC Waste Disposal Authority

It is noted that for NCFS7 Waterdell is located adjacent to Waterdale Transfer Station, and an appropriate buffer would be required with any development. It is recommended that the remaining sites will be required to utilise S106 or CIL to fund increased service capacity.

The Waste Disposal Authority also made general comments for each settlement. These are listed below:

- Abbots Langley General Comments: Recycling Centre: This settlement is in the catchment area for Waterdale Recycling Centre. Waste Transfer Station:

This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.

- **Bedmond General Comments:** Recycling Centre: This settlement is in the catchment area for Hemel Hempstead Recycling Centre. The existing recycling facility at Eastman Way, Hemel Hempstead, is identified in HCC's 'Local Authority Collected Waste Spatial Strategy, Recycling Centre Annex (Updated 2022)' as being too small to adequately deal with the high level of current, or future demand, or to meet requirements for the increased separation of waste to improve environmental objectives. The size of the centre significantly restricts its layout and the ability of vehicles to make use of available car parking spaces. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- **Belsize General Comments:** Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- **Bricket Wood General Comments:** Recycling Centre: This settlement is in the catchment area for Waterdale Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- **Bucks Hill/Langleybury General Comments:** Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- **Carpenders Park General Comments:** Recycling Centre: The majority of this settlement is in the catchment area for Rickmansworth Recycling Centre. However, there is a small part of the area (including part of NCFS12) which falls within the catchment area for Elstree Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- **Chorleywood General Comments:** Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer

Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.

- Croxley Green General Comments: Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- Kings Langley General Comments: Recycling Centre: This settlement is in the catchment area for Hemel Hempstead Recycling Centre. The existing recycling facility at Eastman Way, Hemel Hempstead, is identified in HCC's 'Local Authority Collected Waste Spatial Strategy, Recycling Centre Annex (Updated 2022)' as being too small to adequately deal with the high level of current, or future demand, or to meet requirements for the increased separation of waste to improve environmental objectives. The size of the centre significantly restricts its layout and the ability of vehicles to make use of available car parking spaces. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- Loudwater General Comments: Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: average of 140%. The demand for SEND school places will keep increasing at a faster rate than the demand for mainstream schools, in line with recent trends. HCC continues to focus on addressing the identified priorities of the Special School Place Planning Strategy 2020-2023. Pupils with SEND will often travel further to school and most journeys to school will be in HCC home to school transport, which requires any school site to be highly accessible by road infrastructure and to have suitable pick up and drop of facilities onsite. Solutions to meet the needs of pupils with SEND often cross local planning authorities and therefore contributions may be sought across LPAs for individual projects
- Rickmansworth General Comments: Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.
- South Oxhey General Comments: Recycling Centre: This settlement is in the catchment area for Rickmansworth Recycling Centre. Waste Transfer Station: This settlement is in the catchment area for Waterdale Waste Transfer Station. Due to insufficient spare capacity, work is currently underway to expand the site, including the development of a shredding facility to for bulky waste and expansion of the main building to provide extra bays.

HCC Education

It is noted that sites NCFS10 Great Westwood Equestrian Park, NCFS13 Catlips Farm and NCFS22 Nine of Herts Golf Club are isolated and therefore either provision a 1FE or 2FE would be required on site. All sites would require S106 or CIL to fund the delivery of new provision.

HCC Early Years

It is noted that one new childcare provision would be needed to meet the wider needs of the Abbots Langley/Hunton Bridge area to mitigate the demand in the area. For all sites S106 or CIL will be needed to be made available to fund the wider childcare and nursery requirements.

HCC Adult Care

For sites NCFS3 The Old Dairy, Chequers Lane, NCFS8 Land off St Albans Lane, NCFS9 Land to the South-West of Woodstock, NCFS7 Waterdell, NCFS17 North Hill Farm, NCFS36 Land North of Little Green Lane, NCFS19 Land Adjacent to 60 Harthall Lane, NCFS20 Lonsdale Hyde Lane, NCFS18 Land to the East of Sarratt Lane, NCFS23 Primrose Lodge, London Road, NCFS24 The Island, land off Church Street and NCFS34 Pinewood Lodge it is noted that the size and location do not meet the criteria for being suitable for adult care development. It is suggested that sites NCFS1 Chequers House, Chequers Land, NCFS2 Fortunes Farm, NCFS31 Land to the South-East of Poles Hill, NCFS32 Land to the South-West of Bragmans Lane, NCFS10 Great Westwood Equestrian Park, NCFS22 Nine of Herts Golf Club, NCFS29 New Model Farm and a combination of NCFS27 Green End Farm and NCFS28 Ravenswood do not meet the locational criteria but could be suitable for a larger housing with care scheme with a range of facilities. More specific suggestions for the remaining sites are listed below:

- NCFS4 High Elms Manor, NCFS11 Grange Wood – the site may be suitable for a nursing home or for 70-80 units of affordable or market housing-with-care
- NCFS6 Land to the East of Watford Road – the site may be suitable for a nursing home or housing-with-care
- NCFS12 Land East of Oxhey Lane, NCFS13 Catlips Farm – the site may be suitable for a larger housing with-care scheme that offers onsite facilities
- NCFS14 Land at Homefield Road – the site may be suitable for a block of six supported housing units
- NCFS15 Chorleywood Library – the site may be suitable for 4-6 supported housing units for individuals with learning disabilities/physical disabilities
- NCFS16 Land at Stag Lane – the site may be suitable for a nursing home or a block of six supported housing units
- NCFS21 Land South of Scots Hill – the site may be suitable for a housing-with-care scheme comprising 70-80 units in a mid-rise block layout
- NCFS25 The Vicarage, Bury Lane – the site is not suitable due to flood risk and size constraints
- NCFS26 Meresworth Care Home, Field Way – the site is not suitable due to size constraints
- NCFS34 Pinewood Lodge – the site could be suitable for a nursing homes

HCC Children's Homes

HCC Children's Homes made comments on five sites. It is noted for sites NCFS22 Nine of Herts Golf Club, NCFS29 New Model Farm, NCFS31 Land to the South-East of Poles Hill and NCFS32 Land to the South-West of Bragmans Lane that a 1 x 4-bedroom children's home is recommended. A Statement of Common Ground with the applicant for NCFS12 Land East of Oxhey Lane has been entered for the delivery of a 1 x 4-bedroom children's Home.

HCC Youth

No specific site comments were made but it is recommended that S106 or CIL is to be made available to fund increased service capacity for any development that takes place.

HCC Fire and Rescue Service

No specific site comments were made but it is recommended that S106 or CIL is to be made available to fund increased service capacity for any development that takes place.

HCC Libraries

No specific site comments were made but it is recommended that S106 or CIL is to be made available to fund increased service capacity for any development that takes place.

HCC Digital Growth

It is noted that overall, Three appears to be the worst performing mobile coverage provider in the area. Sites with particularly poor coverage are NCFS1 Chequers House, Chequers Lane, NCFS2 Fortunes Farm, NCFS3 The Old Dairy, Chequers Lane, NCFS10 Great Westwood Equestrian Park, NCFS13 Catlips Farm, NCFS17 North Hill Farm, NCFS18 Land to the East of Sarratt Lane, NCFS22 Nine of Herts Golf Club, NCFS23 Primrose Lodge, London Road, NCFS31 Land to the South-East of Poles Hill, NCFS32 Land to the South-West of Bragmans Lane and NCFS35 Land South of Chalfont Lane.

HCC Minerals and Waste

Did not object to any of the sites but made comments on each of the sites. For sites NCFS1 Chequers House, Chequers Lane, NCFS2 Fortunes Farm, NCFS3 The Old Dairy, Chequers Lane, NCFS4 High Elms Manor, NCFS6 Land to the East of Watford Road, NCFS8 Land off St Albans Lane, NCFS9 Land to the North-West of Woodstock, NCFS7 Waterdell, NCFS10 Great Westwood Equestrian Park, NCFS11 Grange Wood, NCFS13 Catlips Farm, NCFS17 North Hill Farm, NCFS36 Land North of Little Green Lane, NCFS18 Land to the East of Sarratt Lane, NCFS22 Nine of Herts Golf Club, NCFS24 The Island, land off Church Street, NCFS26 Meresworth Care Home, Field Way and NCFS35 Land South of Chalfont Lane it was noted that no concerns were raised due to minerals and waste, the sites were located within the Sand and Gravel Belt and opportunistic extraction would be encouraged. Sites NCFS12 Land East of Oxhey Lane, NCFS14 Land at Homefield Road, NCFS16 Land at Stag Lane, NCFS21 Land South of Scots Hill, NCFS19 Land Adjacent to 60

Harthall Lane, NCFS20 Lonsdale, Hyde Lane, NCFS23 Primrose Lodge, London Road, NCFS27 Green End Farm, NCFS28 Ravenswood, NCFS29 New Model Farm, NCFS30 Sarratt Lodge and NCFS34 Pinewood Lodge also fall within the Sand and Gravel Belt but there is unlikely to be opportunity for opportunistic extraction. There were also no concerns related to minerals and waste. Sites NCFS31 Land to the South-East of Poles Hill and NCFS32 Land to the South-West of Bragmans Lane did not raise any concerns and are both outside of the Sand and Gravel Belt. It was additionally noted that NCFS15 Chorleywood Library and NCFS25 The Vicarage, Bury Lane were too small to be included as major development and therefore would not necessitate the need for a Site Waste Management Plan.

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

HWE ICB

HWE ICB were generally supportive of Net Zero Policy XC and noted that a meaningful assessment of the impact on healthcare services across the district can only be done once the SHELAA site assessments have been completed.

National Highways

The principal interest of National Highways is to safeguard the operation of the M25 J17, J18, J18 and J20. It is noted that a number of allocated sites have been identified near to the Strategic Road Network such as Great Westwood Equestrian Park, Waterdell, and Catlips Farm. If and when a full application comes forward for these sites, National Highways will provide further comments at that time.

- 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

Made supportive comments for Net Zero Policy XE and commented that policy criterion E3, Adapting Heritage Assets to Climate Change was a balanced approach to improving the climate resilience of heritage assets. In terms of sites, it is noted that NCFS8 Land off St Albans Lane, NCFS9 Land to the North-West of Woodstock, NCFS31 Land to the South-East of Poles Hill, NCFS10 Great Westwood Equestrian Park, NCFS11 Grange Wood and NCFS26 Meresworth Care Home, Field Way are in close proximity to Listed Buildings or Conservation Areas, although they are likely to be acceptable from a heritage perspective, Heritage Impact Assessments are recommended. Sites NCFS32 Land to the South-West of Bragmans Lane, NCFS13 Catlips Farm, NCFS14 Homefield Road, NCFS15 Chorleywood Library, NCFS17 North Hill Farm, NCFS18 Land to the East of Sarratt Lane, NCFS22 Nine of Herts Golf Club, NCFS23 Primrose Lodge, London Road, NCFS24 The Island, land off Church Street, NCFS25 The Vicarage, Bury Lane, NCFS27 Green End Farm, NCFS28 Ravenswood, NCFS29 New Model Farm, NCFS30 Sarratt Lodge and NCFS35 Land South of Chalfont Lane are also in close proximity to Listed Buildings or Conservation Areas but the heritage impact is unclear. It is again suggested that a Heritage Impact Assessment (HIA) is carried out for these sites. Historic England objected to NCFS4 High Elms Manor due to its impact upon the Listed Building of High Elms Manor. The remaining sites are considered to be suitable from a heritage perspective.

Canal and River Trust

Suggestions are made in relation to the Biodiversity and Net Zero Policy XC for a utilisation of the canals in the district to facilitate sustainable heating and cooling without an adverse effect on biodiversity to be included in the policy wording. The trust also commented on sites NCFS6 Land to the East of Watford Road and NCFS24 The Island, land off Church Street. It is noted that the Trust would require any development to not adversely affect the integrity of the waterway structure, quality of the water, result in unauthorised discharges and run off or encroachment; detrimentally affect the landscape, heritage, ecological quality and character of the waterways; prevent the waterways potential from being fully unlocked or discourage the use of the waterway network.

Environment Agency

A number of recommendations regarding the Biodiversity Policy include a 10-metre buffer zone (instead of 8 metres) is integrated as a wider requirement in line with the biodiversity net gain river metric, wording integrated that states the river metric will be completed where appropriate, wording amended to build in the inclusion of 'priority species and habitats', better integration into wording of the Thames River Basin Management and a requirement for Water Framework Directive Assessment for development proposals that may have impacts on the water environment. For Net Zero Policy XC, it is suggested that wording for C2 and C5 includes that the frequency of future flooding events will increase as a result, for C2 that all developments should be designed to enhance resilience to the anticipated effects of climate change now and for their lifetime and for Section C5 that all development must incorporate proactive measures that increase resilience to extreme weather events and a changing climate. The Environment Agency also made a number of comments on specific sites. Sites NCFS1 Chequers House, Chequers Lane, NCFS2 Fortunes Farm, NCFS3 The Old Dairy, Chequers Lane, NCFS4 High Elms Manor, NCFS8 Land off St Albans Lane, NCFS9 Land to the South-West of Bragmans Lane, NCFS7 Waterdell, NCFS13 Catlips Farm, NCFS21 Land South of Scots Hill and NCFS26 Meresworth Care Home, Field Way are all within Source Protection Zone 1 areas and therefore should require robust supporting documentation demonstrating that appropriate sites will not result in the deterioration of groundwater quality. Sites NCFS6 Land to the East of Watford Road and NCFS12 Land East of Oxhey Lane are within Flood Zone 2 and a sequential test should be applied before a decision is made. Sites NCFS24 The Island, land off Church Street and NCFS25 The Vicarage, Bury Lane are both opposed due to their location in Floodzones 3b and 3a.

Natural England

England were supportive of the Chilterns Beechwoods SAC Policy and identified potential allocations NCFS31 Land to the South-East of Poles Hill, NCFS32 Land to the South-West of Bragman's Lane and NCFS10 Great Westwood Equestrian Park as being within the sphere of influence. It is also suggested that NCFS7 Waterdell and NCFS10 Great Westwood Equestrian Park are within the Impact Risk Zones for Bricket Wood Common SSSI and Westwood Quarry SSSI and would therefore require further consultation with Natural England. Additionally, NCFS35 Land South of Chalfont Lane triggers the protected sites for potential water and water quantity impacts of Mid Colne Valley SSSI, Denham Lock Wood SSSI, and Fray's Farm Meadows SSSI and therefore would be required to follow the highest water efficiency standards.

3.7 Landowner/ Promoter Responses

- 3.7.1 The majority of landowner/promoter responses generally supported the Net Zero policies but provided a number of recommendations for alterations. Suggestions were also received for alterations to the other policies.

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

- Inconsistency with the 2023 Written Ministerial Statement creating a challenge regarding viability
- Inconsistency with the Government's Future Homes Standard (FHS)
- Inconsistency with the Government's Future Building Standard (FBS)
- Policy XC water credits lack of flexibility and does not align with national standards
- Policy XD limits on embodied carbon may prove challenging and does not align with national standards
- The Council should submit a full Regulation 18 Draft Plan prior to proceeding to Regulation 19
- Minimal progress being made to meet housing targets

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

- **NCFS1 Chequers House, Chequers Lane** – unsustainable, inaccessible and isolated
- **NCFS2 Fortunes Farm** – unsustainable, inaccessible and isolated
- **NCFS3 The Old Dairy, Chequers Lane** – unsustainable, inaccessible and isolated
- **NCFS4 High Elms Manor** – unsustainable, inaccessible and isolated
- **NCFS6 Land to the East of Watford Road** – unsustainable, inaccessible and isolated
- **NCFS8 Land off St Albans Lane** – unsustainable, inaccessible, isolated, inappropriate access arrangements and highway safety concerns
- **NCFS9 Land to the North-West of Woodstock** - unsustainable, inaccessible, isolated, inappropriate access arrangements and highway safety concerns
- **NCFS31 Land to the South-East of Poles Hill** – unsustainable, inaccessible and isolated
- **NCFS32 Land to the South-West of Bragmans Lane** – unsustainable, inaccessible and isolated
- **NCFS7 Waterdell** – unsustainable, inaccessible and isolated
- **NCFS10 Great Westwood Equestrian Park** – unsustainable, inaccessible and isolated
- **NCFS11 Grange Wood** – unsustainable, inaccessible and isolated
- **NCFS12 Land East of Oxhey Lane** – unsustainable, inaccessible and isolated
- **NCFS13 Catlips Farm** – unsustainable, inaccessible and isolated
- **NCFS14 Land at Homefield Road** – Loss of residential care facility
- **NCFS16 Land at Stag Lane** - Loss of protected open space
- **NCFS36 Land North of Little Green Lane** – Unsustainable location
- **NCFS18 Land to the East of Sarratt Lane** – Risk to safety, countryside amenity and integrity of the Green Belt
- **NCFS27 Green End Farm** – Poor pedestrian access
- **NCFS28 Ravenswood** - Poor pedestrian access
- **NCFS29 New Model Farm** – Poor pedestrian access and unsustainable location

3.8 Public Responses

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 policies. For Question 1, related to the Council's proposed Biodiversity Policy, there were 23

members of the public who were in support and 12 that were opposed (see Figure 10 below).

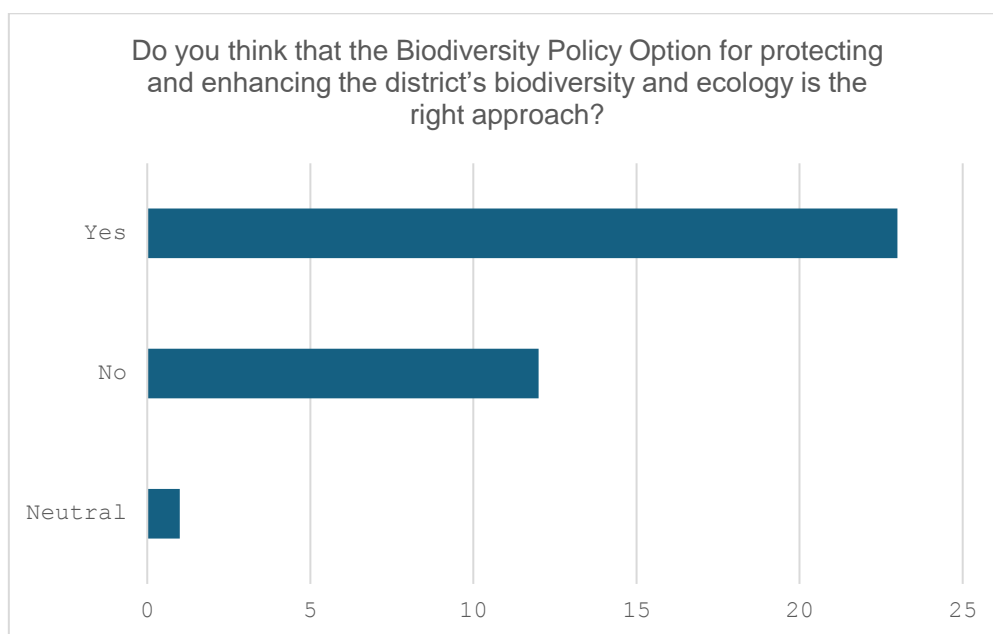


Figure 10. Summary of all public individual respondent's answers to Question 1

- 3.10 A similarly large majority of public individual respondents agreed with the Council's Chiltern Beechwoods Special Area of Conservation (SAC) Policy Option. (see Figure 11 below) In total, 14 respondents agreed with this approach whilst 4 did not.

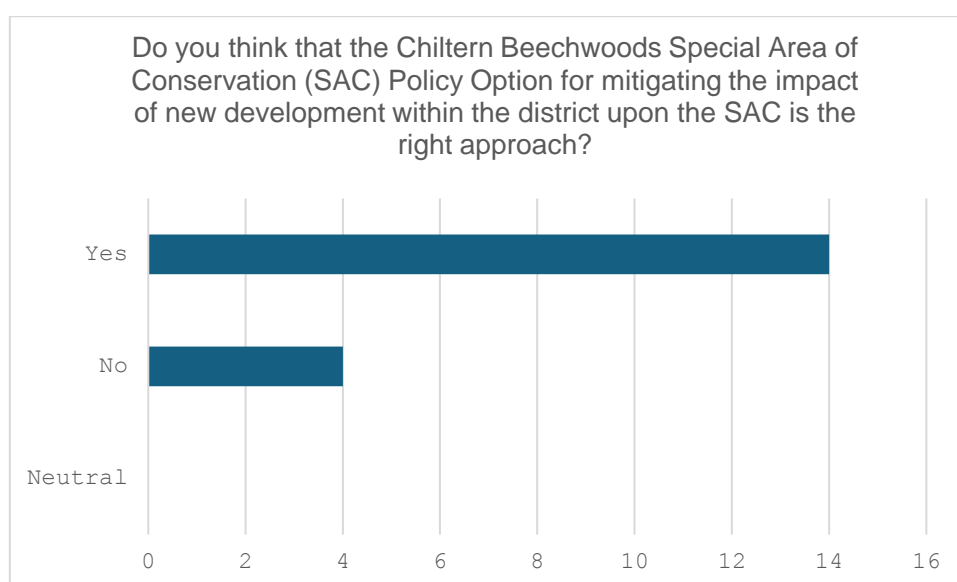


Figure 11. Summary of all public individual respondent's answers to Question 3

- 3.11 A large majority of public individual respondents agreed with the Council's Northwood Headquarters (MOD) Policy Option. (see Figure 12 below) In total, 16 respondents agreed with this approach whilst 5 did not.

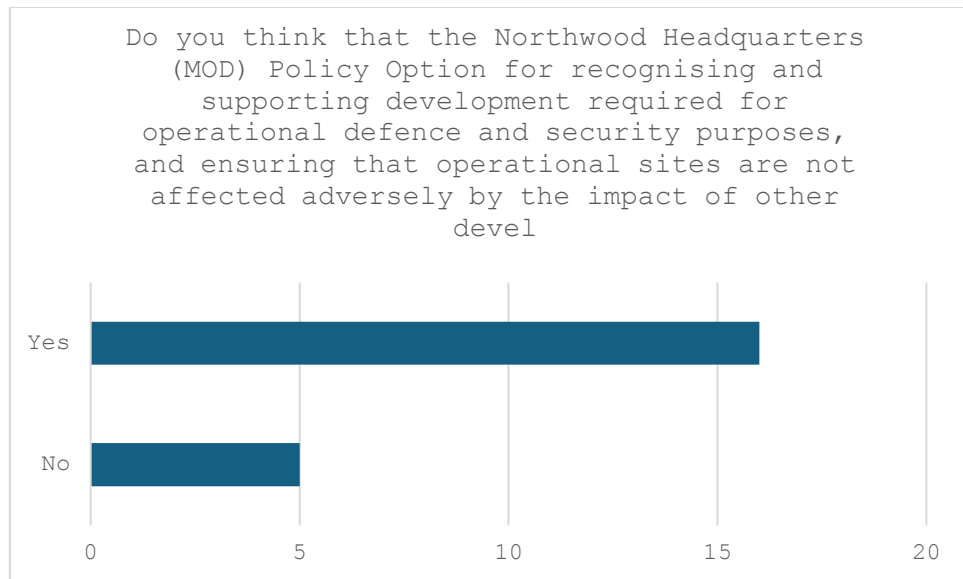


Figure 12. Summary of public individual respondent's answers to Question 5

- 3.12 A small majority of public individual respondents agreed with the Council's Net Zero Policy XA Option. (see Figure 13 below) In total, 11 respondents agreed with this approach whilst 9 did not.

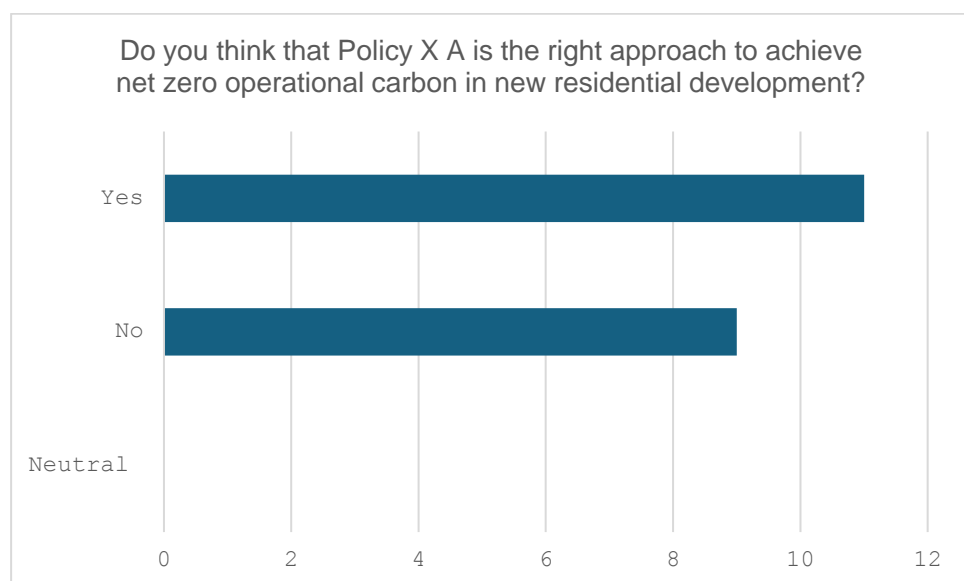


Figure 13. Summary of public individual respondent's answers to Question 7

- 3.13 A small majority of public individual respondents agreed with the Council's Net Zero Policy XB Option. (see Figure 14 below) In total, 11 respondents agreed with this approach whilst 8 did not.

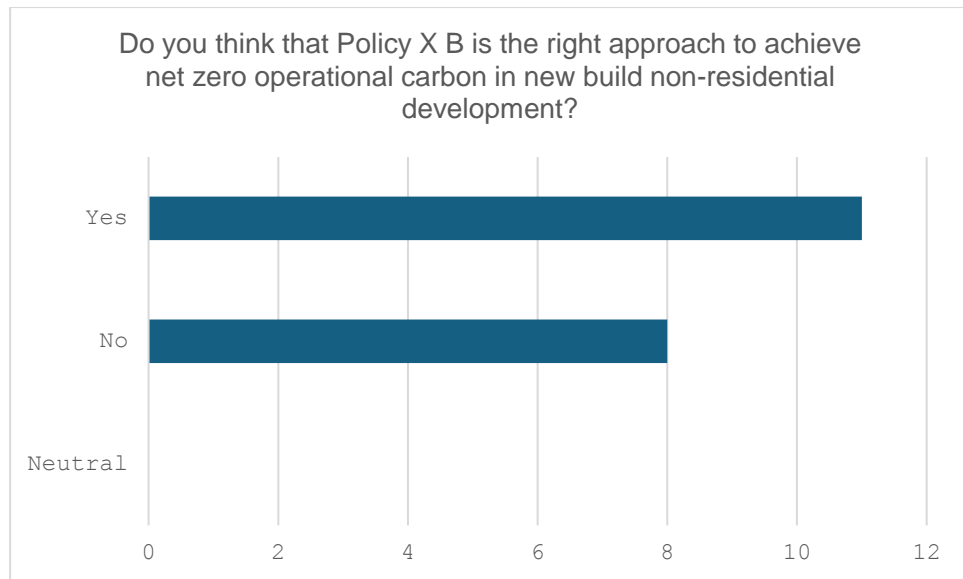


Figure 14. Summary of public individual respondent's answers to Question 9

- 3.14 A large majority of public individual respondents agreed with the Council's Net Zero Policy XC Option. (see Figure 15 below) In total, 13 respondents agreed with this approach whilst 4 did not.

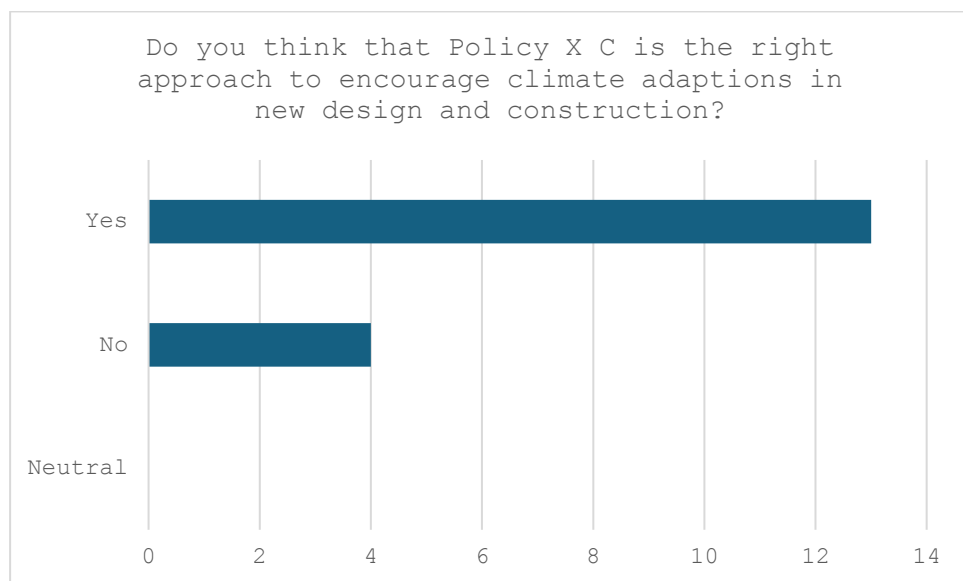


Figure 15. Summary of public individual respondent's answers to Question 11

- 3.15 A majority of public individual respondents agreed with the Council's Net Zero Policy XD Option. (see Figure 16 below) In total, 12 respondents agreed with this approach whilst 6 did not.

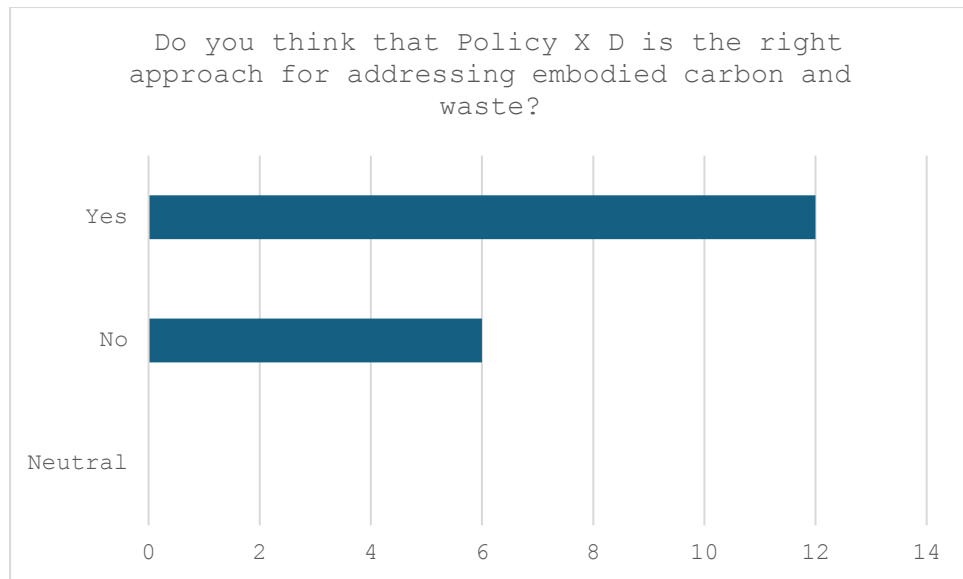


Figure 16. Summary of public individual respondent's answers to Question 13

- 3.16 A large majority of public individual respondents agreed with the Council's Net Zero Policy XE Option. (see Figure 17 below) In total, 15 respondents agreed with this approach whilst 4 did not.

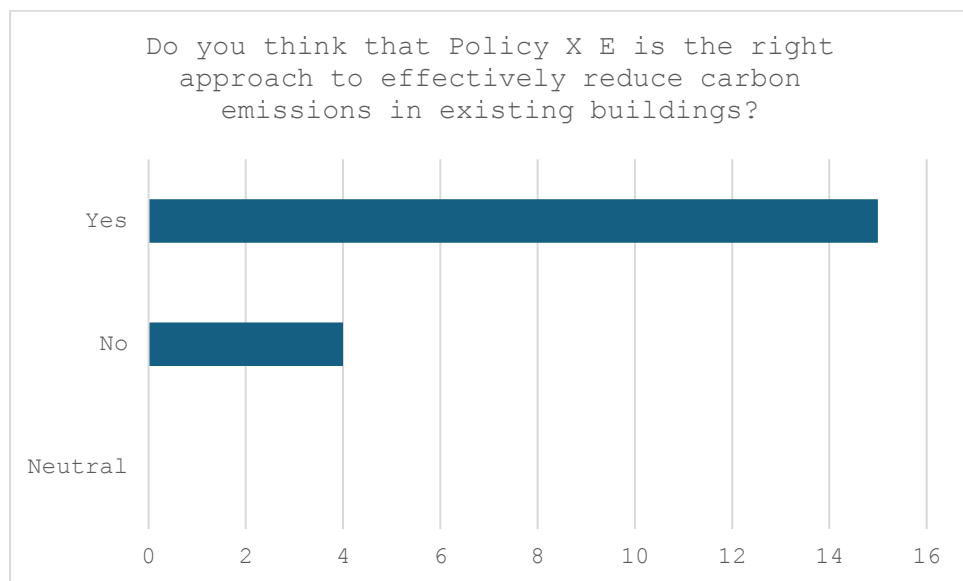


Figure 17. Summary of public individual respondent's answers to Question 15

3.17 Key Themes Within Public Responses to Policies:

- 3.17.1 A number of key themes were identified through the public responses to the policies section of the consultation, as set out below.

- **Biodiversity Policy** – Public respondents tended to be in support of the protection of biodiversity, ecology and open space while some believe that the policy should go further. There are concerns that developers may not take Biodiversity Net Gain seriously and that

being able to offset development offsite rather than onsite will be detrimental to local communities.

- **Chilterns Beechwoods Special Area of Conservation (SAC) Policy** – Public respondents tended to be in support of the policy, noting the importance to protect the natural environment. However, there are once again concerns relating to developers avoiding their responsibilities.
- **Northwood Headquarters (MOD) Policy** – Public respondents tended to be in support of the policy, noting the importance of supporting the MOD to function effectively. There were a few responses which suggested that the site may be better used for affordable housing.
- **Policy XA: Net Zero Operational Carbon in New Build Residential Development** – Public respondents tended to be in support of the policy, particularly mentioning the importance to reduce pollution and combat climate change. Some respondents suggested that the policy went further regarding solar panels, water reservation and pressure on developers to adhere to standards.
- **Policy XB: Net Zero Operational Carbon in New Build Non-Residential Development** - Public respondents tended to be in support of the policy, particularly mentioning the importance to reduce pollution and combat climate change. Again, there were a few concerns regarding policy implementation.
- **Policy XC: Climate-adapted Design and Construction** – Public respondents tended to be in support of the policy, mentioning the importance to protect new development against the impacts climate change.
- **Policy XD: Embodied Carbon and Waste** – Public respondents tended to be in support of the policy but some suggested that it does not go far enough.
- **Policy XE: Reducing Carbon Emissions in Existing Buildings** – Public respondents were generally supportive of the policy with some concerns relating to the feasibility of implementation.

3.18 Key Themes Within Public Responses to Sites:

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

3.18.2 **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.

3.18.3 Transport

Many respondents expressed concerns over access, parking, highway infrastructure and increased congestion. These concerns were mainly prevalent for the larger, more rural sites, which many are proposed to be served via single-track country lanes. These concerns were often the most prevalent alongside the Green Belt.

3.18.4 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. Specific infrastructure included schools, medical facilities, roads, public transport and sewage and drainage systems. There were also questions as to whether infrastructure would be delivered as part of new developments.

3.18.5 Sustainability

Many public respondents expressed concerns relating to the sustainability of some sites, particularly those in isolated rural areas. Many suggested that some of the more isolated sites were unsustainable due to the reliance on car usage, lack of active travel infrastructure and safe pedestrian footpaths and poor access to amenities.

3.18.6 Ecology and Biodiversity

Many public respondents expressed concerns relating to the natural environment. This included harm to biodiversity, including protected species, protected trees and general open green spaces. It was often noted when a site was within or close proximity to a Local Wildlife Site or protected woodland.

3.18.7 Flooding

The risk of flooding, particularly surface water flooding was raised by many of the public respondents for many of the sites. This was particularly prevalent for sites NCFS6 Land to the East of Watford Road, NCFS24 The Island, land off Church Street and NCFS25 The Vicarage, Bury Lane, of which the risks of flooding were made prevalent within the SHELAAs.

3.18.8 Local Character

Some respondents expressed concerns relating to a development's potential impact upon the local character of an area. This was particularly prevalent for sites located within or in close proximity to a Conservation Area or a Listed Building. There were also comments relating to the general character of the rural setting of the District. Additionally, for many sites, the indicative dwelling capacity was referred to, often stating that the site was being over developed.

- 3.19 The majority of sites received more “no” responses to whether they are considered an appropriate development site than “yes” responses. The sites with the highest percentage of ‘no’ responses are listed below.

NCFS31: Land to the South-East of Poles Hill

Public Consultees: Yes: 7, No: 98

Main Concerns:

- Access (including road infrastructure and pedestrian footpaths)
- Location within the Green Belt
- Impact on Local Character and heritage

- Unsustainable location
- Ecology and Biodiversity
- Congestion

NCFS32: Land to the South-West of Bragmans Lane

Public Consultees: Yes: 6, No: 96

Main Concerns:

- Access (including road infrastructure and pedestrian footpaths)
- Location within the Green Belt
- Impact on Local Character and heritage
- Unsustainable location
- Ecology and Biodiversity
- Congestion

NCFS13: Catlips Farm

Public Consultees: Yes: 19, No:189

Main Concerns:

- Access (including road infrastructure and pedestrian footpaths)
- Location within the Green Belt
- Impact on Local Character and heritage
- Ecology and Biodiversity
- Urban sprawl and overdevelopment connecting the two settlements of Rickmansworth and Chorleywood
- Proximity to motorway
- School, Doctors and sewage capacity
- Congestion

NCFS16: Land at Stag Lane

Public Consultees: Yes: 8, No: 139

Main Concerns:

- Access (including road infrastructure and pedestrian footpaths)
- Location within the Green Belt
- Ecology and Biodiversity
- Impact upon Local Wildlife Site and loss of open space
- Impact on Public Right of Way
- Overdevelopment of area
- Congestion

NCFS36: Land North of Little Green Lane

Public Consultees: Yes: 7, No: 77

Main Concerns:

- Access (including road infrastructure and pedestrian footpaths)
- Location within the Green Belt
- Congestion
- Ecology and Biodiversity
- Impact on Local Character and heritage

3.20 However, three sites received more “yes” responses than “no”, as seen below:

NCFS15: Chorleywood Library

Public Consultees: Yes:100, No:47

Main Themes and Concerns:

- Brownfield site
- Sustainable location with good access to amenities and services
- Concern over potential loss of library (including public toilets)
- Concern over impact on local character and Chorleywood Conservation Area

NCFS26: Meresworth Care Home, Field Way

Public Consultees: Yes: 71, No:17

Main Themes and Concerns:

- Brownfield Site
- Sustainable location with good access to amenities and services
- Concern over loss of care home and potential capacity issues elsewhere

NCFS34: Pinewood Lodge

Public Consultees: Yes: 43, No: 24

Main Themes and Concerns:

- Brownfield Site (although located within the Green Belt)
- Sustainable location with good access to amenities and services
- Concern over impact on protected woodland and ecology

3.21 Comments on the Sustainability Appraisal Accompanying the Consultation

3.22 There were some concerns raised relating to the adequacy of the assessment for the suitability of sites and may underplay the sustainability impact of some of the proposed developments. Other concerns include the need to focus on practical achievable targets that demonstrate best practice.

4.0 Potential Updates Following the Part 5 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.