

## **Updates to the Local Plan due to Evidence Studies**

This document lists the evidence studies (including second/third draft versions etc) that were received after the Local Plan was shared with Members for the Policy and Resources Committee and Full Council respectively and the potential required updates to the Plan (including planning policies and site allocations). Given committee lead-in times, it was not possible for officers to fully update the Plan in line with recommendations or findings from the studies before sharing the Plan (and associated appendices) with Members. Some drafts of the evidence studies were received prior to the Local Plan being shared with Members (which were fed into the Plan), so the later draft versions and any possible updates will be discussed within this document.

Officers have worked closely with the consultants preparing these studies and as such were aware that there were no 'show stopper' issues that would significantly change the planning policies or result in a change to the list of sites agreed at Local Plan Sub-Committee on 25 November 2025 and recommended to Policy & Resources Committee and Full Council for inclusion in the Regulation 19 Publication version of the Local Plan.

The Local Plan evidence base studies are technical documents commissioned to inform decision making during preparation of the Local Plan. They provide an objective assessment of key issues and help ensure that the policies and proposals within the local plan are justified, proportionate, and consistent with national planning policy. A robust evidence base is essential to demonstrate that the plan is sound.

These studies are typically prepared by independent consultants with specialist expertise, rather than by the local planning authority itself. This independence helps to ensure that the policy choices in the Local Plan are informed by impartial analysis.

Final versions of the evidence studies will be published on the council's website alongside Publication of the Local Plan during the Regulation 19 Consultation.

### **Habitats Regulations Assessment – Appendix 10a**

#### **Purpose:**

The purpose of a Habitats Regulations Assessment (HRA) is to determine whether the plan is compliant with the Habitats Regulations which affords protection to European sites (Special Protection Areas (SPAs) Special Areas of Conservation (SACs) and Ramsar Sites, and their interest or qualifying features. Simply, the HRA evaluates whether Local Plan policies and site allocations would have detrimental impacts on these protected sites.

#### **Summary of Findings:**

The initial "screening stage" found that recreational pressure (i.e damage and disturbance to habitats) arising from the site allocations within the Plan could lead to adverse effects on the Chilterns Beechwoods SAC. However, the second "appropriate assessment" stage found that mitigation is provided by the Local Plan policy *Chilterns Beechwoods SAC*. With this mitigation in place, it was determined that adverse effects on the integrity of the Chilterns Beechwoods SAC can be excluded, alone or in combination. Therefore, there was no need for the HRA to proceed to the following stage (Assessment of Alternatives).

#### **Updates to the Local Plan:**

None required.

### **Health & Equalities Impact Report – Appendix 10b**

#### **Purpose**

The Health & Equalities Impact Report is a study combining a Health Impact Assessment (HIA) and an Equalities Impact Assessment (EqIA). An EqIA is a way of measuring the potential impact (positive, negative or neutral) that the Plan (i.e planning policies or site allocations) may have on different groups protected by equalities legislation, notably the Equalities Act 2010. A HIA is a means of measuring the potential health impacts of the Local Plan (i.e from planning policies and site allocations).

#### **Summary of Findings:**

The study assesses and discusses the health and equality impacts (beneficial; adverse; mixed; uncertain or neutral) of the different policy themes within the Plan. The report also recommends potential mitigation and enhancement to policy wording and site allocation wording.

#### **Updates to the Local Plan:**

Numerous policies or reasoned justifications will have minor amendments, however, it is not considered that any of the amendments to wording would be materially significant. Many of the recommendations are non-planning related and as such will not be included in the Local Plan.

### **Landscape Sensitivity Assessment Addendum III (Appendix 10c) and Associated Scoresheet (Appendix 10d)**

#### **Purpose**

The purpose of a Landscape Sensitivity Assessment (LSA) is to assess the sensitivity of a site to built development by assessing its susceptibility to numerous landscape and visual variables. The 37 sites assessed were a combination of “NCFS” sites (submitted to the council in January 2025) and other sites which had not previously been subject to a Landscape Sensitivity Assessment. Sites located in urban locations were scoped out of the assessment.

#### **Summary of Findings:**

The LSA and associated scoresheet sets out the overall sensitivity to built development of the sites assessed. The scores ranged from low to medium-high. None of the sites allocated within the Local Plan scored higher than medium-high (one site).

#### **Updates to the Local Plan:**

The SHELAAs for all of the sites assessed will be updated to reflect the LSA sensitivity scores.

The site allocation policy (within the Local Plan) will be updated if an allocated site received an overall score of medium or higher, to require the submission of a Landscape and Visual Impact Assessment (LVIA) at planning application stage.

### **Three Rivers Local Plan Viability Assessment – Appendix 10e**

## Purpose

The Local Plan Viability Assessment assesses the financial viability of planning policies within the Plan individually and cumulatively, to ensure that future development can accommodate policies in the Plan.

## Summary of Findings:

Some of the key policy themes assessed were affordable housing; BNG; accessibility; net zero; self/custom build and gypsy/traveller pitches.

In terms of affordable housing the report concludes *“we therefore recommend that the emerging target of 40% be adopted and applied on a ‘maximum reasonable proportion’ basis taking site-specific circumstances into account. This reflects the council’s current practice and the adopted Local Plan approach”*. The testing of 50% provision for Green Belt sites indicated that the 50% figure would be viable on most sites coming forward.

In terms of the provision of affordable housing on small sites (primarily through financial contributions), the report finds that this requirement should be viable in almost all cases. In terms of implementation, the report sets out that the policy could be applied through a *“comparison of two residual valuations (one assuming all units are private and the other in which on-site affordable housing is included) with the financial contribution equating to the difference between the two residuals. Alternatively, a formulae-based approach could be used, the latter being simpler to implement”*.

In terms of BNG, the report sets out that the 10% BNG provision has a *“relatively modest impact on residual land values and can therefore be viably absorbed alongside other policies”*.

In terms of accessibility, the report sets out that the councils wheelchair and accessibility requirements *“has a relatively small impact on viability”*.

In terms of the net zero policies the report states that the consultants *“tested the impact that a net zero carbon standard is likely to have on developments in the district and the residual land values will typically fall by around 10% on average. The impact is therefore relatively significant in some cases, but the costs of technology required to achieve net zero carbon are expected to fall over time as research and development drives improvements”*.

Ultimately, no viability recommendations were made to dilute or amend the net zero policies.

In terms of self/custom build, the policy requirements have a *“broadly cost-neutral impact”*.

In terms of the provision of gypsy and traveller pitches, the report concludes that strategic sites accommodating pitches for gypsies and travellers and travelling show people is *“unlikely to have a material effect on the viability of development”*. The report goes on to say *“however, on sites which are being developed at high net to gross ratios, there will be less scope for provision of gypsy and traveller pitches”*

## Updates to the Local Plan:

No updates required.

## **Transport Assessment Technical Note 1 – Appendix 10f**

## Purpose

The COMET transport model has been used to assess the impacts of the allocated development sites on the transport network (including public transport and highways). The Technical Note summarises the scenarios, assumptions and results of the initial transport modelling process and the impacts on the transport network.

#### Summary of Findings:

There is an overall increase in traffic flows on the highway network in Scenario 2 (commitments + allocated sites) compared to Scenario 1 (commitments only), due to the additional traffic generated by the allocations. These are generated across the whole district, with higher flows closest to the development sites.

On the M25, between Junction 18 and Junction 19, in the AM peak there is an increase in flow of 273 vehicles (3.6%) clockwise, and around 115 vehicles (2%) counterclockwise in the PM peak.

The difference in delays on the highway network between Scenario 2 and Scenario 1 are shown. The increases vary across the district from approximately 16 seconds to 1 minute 20 seconds.

There are some links and junctions that are forecast to have increased delay due to the Local Plan allocations. The increased delay is forecast to occur at the Denham Way / Chalfont Road / Maple Lodge Close junction, on the A41 Watford Road, Gallows Hill and Chequers Lane in Abbots Langley, on Rickmansworth Road in Northwood, and on the M25 anticlockwise off-slip at Junction 18.

Overall, the modelling has indicated that the highway network within the district can accommodate the level of growth proposed in the Plan.

#### Updates to the Local Plan:

None required.

### **Transport Assessment (Chapters 1, 2 & 3) – Appendix 10g**

#### Purpose

A Transport Assessment assesses the transport impacts of future development, identifies possible mitigation measures and assists in developing sustainable approaches to transport at a plan-making level. A Transport Assessment will:

- Summarise the relevant national, regional, and local transport policy;
- Describe the existing transport conditions by all modes of transport across the study area;
- Provide details of the Plan's development sites including their location, type and quantum of development and access;
- Describe the traffic modelling assessment that was undertaken and sets of the predicted impacts of the development sites;
- Provide details of the proposed mitigation measures to support the delivery of the development sites

#### Summary of Findings:

Only chapters 1, 2 and 3 are available to share currently. Chapter 1 provides an introduction to the Transport Assessment, chapter 2 provides a review of planning policy and chapter 3 describes the existing transport conditions by all modes of transport at a local and strategic level across the study area of the district.

The Transport Assessment (minus the mitigation measures) will be published alongside the Local Plan during the Regulation 19 consultation. The mitigation measures identified for specific sites will be dealt with at the examination stage (as was the case with the St Albans Local Plan).

#### Updates to the Local Plan:

None required (at this stage).

### **Infrastructure Delivery Plan – Appendix 10h**

#### Purpose

The Infrastructure Delivery Plan (IDP) ensures that the Local Plan reflects an understanding of baseline infrastructure capacity and needs within Three Rivers and helps to ensure that the implications of future planned growth upon infrastructure are understood. It provides a general summary of the different types of future infrastructure investment that may be required, infrastructure implications of the allocated development sites and details on likely infrastructure costings, delivery mechanisms and prioritisation.

#### Summary of Findings:

The findings of earlier drafts of the IDP were incorporated into the Local Plan prior to being shared with Members. However, since the sharing of the Local Plan, a later draft was submitted to officers.

The main findings and recommendations from the later version (if new or amended compared to previous drafts) are set out in the “updates to the Local Plan section” below.

#### Updates to the Local Plan:

The following site allocation policies will be updated with the following amendments/requirements:

#### **H38 – Land to the West and South of Maple Cross (formerly EOS12.2):**

- The number of childcare places required has been confirmed, which is 50.
- Nursery provision to be included in potential new primary school at Maple Cross (and potential expansion of Maple Cross JMI)
- The potential additional primary school will either take the form of a new primary school (3FE) or a new primary school (3FE) in addition to the expansion of Maple Cross JMI. This would need to include SEND places
- Clarification that 2 “settings” of extra care is required

#### **H41 – EOS7 - Land to the South of Shepherds Lane and east of M25**

- Clarification that 1 “setting” of extra care is required

#### **ED2 – Land Including and Adjoining The Reach Free School**

- Clarified that the expansion of the existing school could accommodate 4FE extension

### **ED3 – Woodside Road**

- The number of childcare places required has been confirmed, which is 50.

### **Green Belt Review – Appendix 10i**

#### **Purpose:**

The Stage 4 Green Belt Review was commissioned as a result of updated national policy and guidance. The first component of the review is the assessment of the council's previous Green Belt Reviews against the new policy and guidance to assess whether they are aligned and can continue to be relied upon going forward, or whether parcels require re-assessment.

One of the main purposes of the Stage 4 Green Belt Review is mapping out provisional grey belt. The word provisional has been used to emphasise that there still other factors to be considered prior to deciding whether land fully constitutes grey belt. The report includes a map that identifies provisional grey belt across the parcels that have been assessed at the settlement edge. Another important purpose of the Stage 4 Green Belt Review is to consider whether the alteration of Green Belt boundaries would fundamentally undermine the purposes (taken together) of the remaining Green Belt, when considered across the area of the plan. The review identifies areas of the district where the Green Belt was performing a role of 'fundamental importance'.

In addition, the study reviews the previous washed over villages assessment to consider whether any changes to the recommendations are necessary in light of new policy and guidance.

#### **Summary of Findings:**

The updated draft Stage 4 Green Belt Review (2026) identifies provisional grey belt across the parcels that have been assessed at the settlement edge. Sites that fall outside the assessed areas would need to be considered on a case-by-case basis. The majority of these sites would be provisional grey belt as they would play a limited role in relation to towns and large built up areas. However, many of these sites would fall in unsustainable locations, and as such would not be brought forward even if considered provisionally grey belt.

The parcel level identification of grey belt is helpful at a strategic level for plan-making. However, when considering the identification of grey belt in decision making or for specific sites for allocation, it is more relevant to assess at a site-specific level to ensure the assessment outcomes reflect the site itself and is not skewed by the characteristics of land potentially some distance from the actual site. This means that development management and planning policy officers may need to make their own judgements where applications or potential sites only partially overlap with assessed parcels or only make up a smaller proportion of parcels. It should be noted that at a further level of granularity, assessments of sites' contribution to the Green Belt may yield differing results to those achieved by the relevant parcels in the Green Belt Review.

At Members' request, additional work has been undertaken assessing the impacts of physical features on the assessed parcels whether this would alter the findings in the previous draft version of the review. It is noted that many of the previous parcel assessments considered the impact of physical features though there have been some adjustments to the Green Belt Review where land previously assessed as Green Belt is now assessed as provisional grey belt. Most notably, the site between Abbots Langley (north of Abbots Road) and the M25 has

now been assessed as grey belt rather than Green Belt. This does not alter the council's position on the site (it is not included as a site allocation in the Regulation 19 plan) as it was not originally removed on purely Green Belt grounds.

When considering whether the releasing Green Belt would fundamentally undermine the purposes of the remaining Green Belt across the plan area, the review identifies areas of the district where the Green Belt is performing a role of 'fundamental importance'. These are areas that perform a strategically important role against the Green Belt purposes across the plan area. Green Belt does not necessarily need to perform strongly against all purposes to be considered fundamentally important to the Green Belt.

Seven broad areas of fundamental importance have been identified where future growth should be considered carefully, to ensure that it does not fundamentally undermine the purposes of the Green Belt across the plan area. Identification of an area of fundamental importance may not, however, mean that these areas cannot accommodate some development, and it is for the council to make a balanced planning judgement based on the scale and location of the proposed land for release. If the strategic role of an area of fundamental importance would still continue even if that development were to go ahead, then it is difficult to argue that that development would fundamentally undermine the purposes of the Green Belt.

#### Updates to the Local Plan:

None required.

### **Sustainability Appraisal (SA) – Appendix 10j**

#### Purpose:

A Sustainability Appraisal (SA) is an iterative, evidence based and qualitative process that appraises the environmental, social and economic performance of the Local Plan against a set of sustainability objectives in order to identify, describe and evaluate the likely significant social, economic and environmental effects. Where appropriate, the SA highlights areas where measures to avoid, minimise or mitigate any potential negative effects could be required. Similarly, and where appropriate, opportunities to enhance the contribution that the Local Plan could make to sustainability are identified. The SA also reviews reasonable alternative approaches (for example to the growth strategy). The Local Plan has been subject to a Sustainability Appraisal (including working notes and addendums) at each stage of production (including during every public consultation). The SA also incorporates a Strategic Environmental Assessment (SEA).

#### Summary of Findings:

##### *Assessment of Reasonable Alternatives:*

The assessment of reasonable alternatives explains how different growth and spatial strategy options have been identified and tested through the Sustainability Appraisal (SA) to inform the Regulation 19 Local Plan. It sets out the legal and policy context for considering alternatives, reflects on how options have been explored at earlier plan-making stages, and summarises previous assessments. Overall, the SA process has been iterative, with evidence from earlier assessments helping to shape and refine the emerging plan and narrow down realistic alternatives.

The Local Plan is based on a housing target of 12,480 dwellings over the period 2026–2041, derived from the Government’s Standard Method. After accounting for existing commitments and windfall development, a residual requirement of 10,226 dwellings remains. Extensive evidence gathering has been undertaken to address this need, including calls for sites, an Urban Capacity Study, Green Belt Reviews, and a Strategic Housing and Employment Land Availability Assessment (SHELAA). The SHELAA assessed 284 sites, all of which were subject to SA, distinguishing between sites outside the Green Belt and those within or partially within it. While some capacity exists outside the Green Belt, this is limited and leaves a substantial shortfall, meaning that Green Belt release has been considered unavoidable if housing needs are to be met.

At the Regulation 19 stage, three reasonable alternatives have been identified for assessment. These range from a preferred approach focusing development in the most sustainable locations with limited Green Belt release, through to options involving additional site allocations and progressively greater Green Belt release to meet more of the residual housing requirement. The SA findings indicate that higher levels of housing delivery are associated with increased effects overall: greater positive impacts in social and economic terms, but also increased negative effects on environmental objectives. The preferred spatial strategy has therefore been selected by weighing these trade-offs and seeking to balance meeting housing needs with minimising environmental harm, informed by the evidence base and SA conclusions.

#### *Assessment of Regulation 19 Local Plan Policies:*

The Sustainability Appraisal concludes that the Local Plan Vision is broadly compatible with the SA objectives, particularly in social and economic terms, as it seeks to meet the needs of the district’s population while protecting local character. The Vision also aligns well with many environmental objectives through its emphasis on high-quality built and natural environments, climate-sensitive development, carbon reduction, and the transition to a zero-carbon future. However, some uncertainties are identified, reflecting the fact that delivering the required scale of development may have environmental impacts depending on its location, scale, and design. The SA notes that these potential tensions are addressed by other Strategic Objectives and policies within the Plan, which are intended to mitigate or minimise adverse effects arising from new development.

The Sustainability Appraisal finds that the Regulation 19 Local Plan policies perform very strongly overall, with significant positive effects identified against almost all of the fifteen SA objectives and minor positive effects recorded across the full framework. The only objectives where significant positive effects were not identified are soils and sustainable locations, reflecting more limited policy influence in these areas. While the overall picture is highly positive, the assessment also notes the potential for some minor negative effects, particularly in relation to flood risk, climate change, soils, and landscape and townscape, which are largely associated with the impacts of new development.

Significant positive environmental effects are identified across a wide range of objectives. The policies strongly support biodiversity through mandatory biodiversity net gain, protection and enhancement of designated and non-designated sites, and requirements for long-term stewardship of green and blue infrastructure. Positive effects are also identified for water resources, flood risk, air quality, and climate change, driven by policies that promote water efficiency, sustainable drainage, avoidance of high flood risk areas, low-carbon

development, and a shift towards sustainable transport and reduced car dependency. The conservation and enhancement of the historic environment, landscape, and townscape are also assessed as likely to benefit significantly from policy requirements that protect local character, heritage assets, valued landscapes, and high-quality design.

In social and economic terms, the policies are assessed as delivering significant positive effects for health and wellbeing, community cohesion, housing, sustainable prosperity, and employment and skills. This reflects strong policy support for open space, recreation and active travel, the protection and provision of community facilities, a diverse housing mix, and the safeguarding and growth of employment land in sustainable locations. Together, the SA concludes that the Regulation 19 policy framework provides a robust basis for delivering growth in a way that maximises social and economic benefits while seeking to avoid, minimise, and mitigate environmental harm.

#### *Assessment of Regulation 19 Local Plan Site Allocations:*

The Sustainability Appraisal site assessments across the district indicate that, for most settlements, the proposed site allocations are unlikely to give rise to significant positive or negative effects. Instead, the effects are generally minor and mixed, reflecting the relatively modest scale of development in many locations and the combination of brownfield and greenfield sites. Across settlements, minor positive effects are most commonly identified in relation to housing delivery, sustainable locations, health and wellbeing, community cohesion, and climate change, demonstrating the contribution of site allocations to meeting housing needs and supporting accessible, connected communities.

A small number of significant effects are identified where site scale or sensitivity is greater. In Maple Cross and Mill End, individual strategic sites are assessed as having significant positive effects on the housing objective due to their substantial contribution to overall housing supply. Conversely, a limited number of significant negative effects are identified where environmental constraints are pronounced, most notably in Chorleywood, where one site within the Chilterns National Landscape is assessed as having significant adverse landscape impacts, and in Rickmansworth, where a site located entirely within Flood Zones 2 and 3 is assessed as having a significant negative effect on flood risk.

More broadly, minor negative effects are identified across several settlements in relation to biodiversity, soils, landscape and townscape, flood risk, and the historic environment. These effects are typically associated with the loss of greenfield land, development in environmentally sensitive locations, or localised constraints such as floodplains and heritage assets. However, the absence of widespread significant negative effects suggests that, overall, the site selection process has sought to avoid the most constrained locations where possible. The SA concludes that, taken together, the proposed sites would support delivery of the Local Plan's objectives while keeping adverse environmental and sustainability effects largely at a manageable and localised level, subject to mitigation through policy and design.

#### Updates to the Local Plan:

None required

## **Strategic Flood Risk Assessment (SFRA) Levels 1 and 2 – Appendix 10k**

### **Purpose:**

This Strategic Flood Risk Assessment provides an update to the South West Hertfordshire Level 1 SFRA (2018), which was prepared for the LPAs of Dacorum Borough, St Albans City and District, Three Rivers District and Watford Borough.

This update was required due to numerous changes in policy and guidance in the intervening period. The updated Level 1 SFRA reflects the latest changes to the NPPF, PPG, flood risk guidance and new national flood risk mapping. The Level 2 SFRA applies the new guidance and policy to previously submitted and new sites at risk of flooding, in a detailed assessment.

The study provides useful information for partners, developers and planners on a range of flood risk related matters. These include various flood risk maps from a range of sources, guidance on matters including the application of the sequential test, surface water management/SuDS and flood warning and emergency planning and furthermore, site specific assessments of sites accompanied by mapping and individual reports for sites at risk of flooding.

### **Summary of Findings:**

To avoid duplication, the main findings can be seen in the below section.

### **Updates to the Local Plan:**

The supporting text to the flooding policy will be updated to refer to the 2026 version of the SFRA.

Additionally, the following changes will be made to Policy ENV1 (Flood Risk & Water Resources):

Addition of the following sentence to policy criterion 8 “...*particularly in the River Colne and Gade catchments, where the cumulative impact of development will have the highest overall impact on flood risk*”

New policy paragraph under criterion 8 with the following wording: “*Natural Flood Management is encouraged where locationally relevant or as an off-site measure for larger developments looking to reduce flood risk upstream, or as part of BNG. These can include offline storage areas, reconnection and restoration of functional floodplains and targeted woodland planting. An example of areas where this may work are areas that could facilitate works to allow the existing lake and pond system in the Colne Valley to store flood water*”.

Expansion of paragraph 10.15 of the reasoned justification with the following wording: “*SuDS on smaller developments will help with mitigating the cumulative impact of flood risk, defined as a series of many smaller developments in a river catchment adding to overall run off if no measures are in place to reduce runoff*”.

Creation of a new paragraph under paragraph 10.15 with the following wording:

“*Development can provide opportunities to work with natural processes to help reduce flood and erosion risk, benefit the natural environment and reduce costs of schemes. This is known as Natural Flood Management (NFM), a process whereby action is taken to mitigate*

*flood risk by protecting, restoring and emulating natural processes. This approach aims to reduce flow volumes and delay the arrival of peak flood flow downstream. Techniques include:*

- *Creation of offline storage areas.*
- *Re-meandering streams (creation of new meandering courses or reconnecting cut-off meanders to slow the flow of the river).*
- *Targeted woodland planting.*
- *Reconnection and restoration of functional floodplains*
- *De-culverting and naturalising watercourses*
- *Installation or retainment of large woody material in river channels.*
- *Improvements in management of soil and land use.*
- *Creation of rural and urban SuDS.*

*Some measures will be location specific and should be tailored to an areas needs, with reconnection and restoration of functional floodplains and the creation of offline storage areas more relevant to the lowland Colne areas in and around the lake system of Rickmansworth and further downstream and woodland planting and re-meandering of streams in the more rural upstream areas”.*

The following site allocation policies (and SHELAAs) require updating with the following wording:

### **H3 - Garages, Jacketts Field (formerly AB31)**

The council's SFRA (2026) has concluded that due to a quarter of the site being within the 'design' flood event for surface water (1% Annual Exceedance Probability (AEP) plus climate change) a Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage. The FRA should demonstrate avoidance of the highest risk areas or flood resilience and resistance measures that need to demonstrate no increase in flood risk off site. If this cannot be achieved, given the size of the site, a small reduction in dwelling capacity may be required.

### **H18 - Heath House, Rickmansworth Road (formerly ACFS1)**

The council's SFRA (2026) has concluded that arrangements for safe access and escape will need to be provided for the 1% AEP surface water events with an appropriate allowance for climate change, considering depth, velocity, and hazard. Design and access arrangements will need to incorporate measures, so development and occupants are safe. This information will need to be submitted at the planning application (and preferably pre-application) stage.

### **H48 - Andrew Leys Farm, Harefield Road (formerly ACFS10)**

The council's SFRA (2026) has concluded that development should be steered outside of the area of surface water flood risk in the eastern part of the site. Flood depths of between

1.2m and 2m metres are predicted within the eastern site boundary between the 3.33% and 0.1% flood events. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage. Detailed surface water modelling will be required, building on the national broader scale mapping. This may reduce the extent and depth of surface water flood risk, however, it is still possible that a reduction in site capacity may be required following detailed modelling (as avoidance may be a more appropriate response to higher flood risk).

#### **H27 - Land at Croxley Station (formerly CFS20)**

The council's SFRA (2026) has concluded that development should be steered outside the areas of surface water flood risk on the site. Where this is not possible, flood resilience and resistance measures should be implemented. Arrangements for safe access and escape will need to be provided for the 1% AEP surface water events with an appropriate allowance for climate change, considering depth, velocity, and hazard. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage.

#### **H47 - Affinity Water Depot, Church Street (formerly CFS60)**

The council's SFRA (2026) has concluded that the site is significantly impacted by fluvial flood risk, with the majority of the site in Flood Zone 3b. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage. For the FRA, detailed site-specific hydraulic modelling will be required, building on the recent River Colne model and incorporating culvert and sluice blockage modelling, as well as groundwater monitoring, due to the shallow groundwater in the area, for example.

To ensure safe access and egress during the 1% AEP fluvial and surface water flood events, works outside of the boundary of the site may be required. Subsequently, early discussions will be required with relevant bodies.

The SFRA advises that the site will only be appropriate for the reuse/conversion of existing buildings, or the redevelopment of buildings on the same footprint and that any development should only have commercial uses on the ground floor, given the high flood risk across most of the site.

#### **H28 - Cinnamond House (formerly CFS61)**

The council's SFRA (2026) has concluded that the site is at significant surface water flood risk. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage. Future proposals will need to carefully consider this risk and demonstrate users of the site can be kept safe during the lifetime of the development through a detailed site-specific FRA including detailed surface water modelling. Development should be steered away from the areas identified to be at highest risk of surface water flooding within the site.

Arrangements for safe access and escape will need to be provided for the 1% AEP surface water events with an appropriate allowance for climate change, considering depth, velocity, and hazard.

#### **H29 - Garages off Grove Crescent, Croxley Green (formerly CG47)**

The council's SFRA (2026) has concluded that almost a quarter of the site at risk of flooding in the 100 year plus climate change flood event. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage. Flooding potential is mainly on the access road, so safe access will need to be demonstrated in the FRA, without increasing flood risk elsewhere.

#### **H51 - Stockers Farm Road Depot (formerly H22a)**

The council's SFRA (2026) has concluded that there is significant risk of surface and fluvial flooding, with the majority of the site at risk in both surface water and fluvial design flood events, so development will need to avoid the higher risk areas and provide resilience and mitigation in the lower flood risk areas. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage.

Safe access and egress is not possible in the design flood event, so a flood warning and evacuation plan must be prepared to assess how residents can be safely evacuated or shelter safely on site. It is possible that given the size of the site and extent of flood risk, that site capacity may need to be reduced following a detailed FRA, that should include more detailed surface water and fluvial modelling.

#### **H24 - Chorleywood Library (formerly NCFS15)**

The council's SFRA (2026) has concluded that development should be steered away from areas of significant surface water flooding and groundwater monitoring is suggested to determine emergence risk. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage.

Safe access may not be possible during the 1% AEP plus climate change event, which must be considered during the site-specific FRA.

#### **H56 - Pinewood Lodge (formerly NCS34)**

The council's SFRA (2026) has concluded that development should be steered outside the areas of surface water flood risk on the site. Where this is not possible, flood resilience and resistance measures can be implemented. However, this will not be appropriate in the area of deep ponding in the south of the site, unless works can be undertaken that do not increase flood risk elsewhere.

Arrangements for safe access and escape will need to be provided for the 1% AEP surface water events with an appropriate allowance for climate change. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage.

#### **H33 - Land at Mill Place (formerly NSS10)**

The council's SFRA (2026) has concluded that development should be steered away from the areas of highest surface water flood risk in the 100 year plus climate change flooding event. A Flood Risk Assessment (FRA) must be submitted at the planning application (and preferably pre-application) stage.