

25/0484/OUT APPENDIX A – CONSULTEE COMMENTS

1.1.1 Herts Archaeology – No objection, subject to conditions.

Thank you for consulting us on the above application.

Please note that the following advice is based on the policies contained in the National Planning Policy Framework.

There has been several archaeological investigations in the immediate area related to the widening of the M25, which have produced evidence of occupation and settlement of the area from the prehistoric period onwards.

The parcel of land immediately west of the site, at Maple Cross Bund and Pond 5 [Event Hertfordshire no. 8445] revealed a prehistoric hearth [Historic Environment Record no. 31457] along with features and finds dating from the Bronze Age period through to the Roman period before declining thereafter. Further afield, to the south of the current site, archaeological evaluations were undertaken regarding works associated with the Colne Valley South Embankment (M25 slip road) and the re-routing of water mains (etc.) at land to the south of Chalfont Lane [EHT 8666]. Archaeological features of largely prehistoric date were also identified during both of these evaluations.

We welcome the inclusion of heritage in the Design and Access Statement as well as the Heritage Statement submitted in support of the application, however, the discussion of ‘heritage’ regarding the proposed development only considered the impacts to the setting of designated assets and not the direct impacts associated with non-designated assets. We would have hoped, given the archaeologically rich landscape, that the below-ground impacts of the site would have been assessed and submitted as part of the application.

We therefore consider that the position and size of the proposed development is such that it should be regarded as likely to have an impact on heritage assets of archaeological interest and we therefore recommend that the following provisions be made, should you be minded to grant consent:

- 1. The archaeological supervision of the removal of soil and overburden to the archaeological horizon, via a ‘strip and record’ exercise, within the footprint of the development, and of any other areas of ground reduction required, and the investigation and recording of any archaeological features or deposits thereby revealed, prior to the commencement of the groundworks associated with the development;*
- 2. The analysis of the results of the archaeological work, with provisions for the subsequent production of a report and an archive, and the publication of the results, as appropriate;*
- 3. Such other provisions as may be necessary to protect the archaeological interests of the site.*

I believe that these recommendations are both reasonable and necessary to provide properly for the likely archaeological implications of this development proposal. I further believe that these recommendations closely follow para. 218, etc. of the National Planning Policy Framework, the relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice

in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

In this case three appropriately worded conditions on any planning consent would be sufficient to provide for the level of investigation that this proposal warrants. I suggest the following wording:

A *No demolition/development shall take place/commence until an Archaeological Written Scheme of Investigation has been submitted to and approved by the local planning authority in writing. The scheme shall include an assessment of archaeological significance and research questions; and:*

- 1. The programme and methodology of site investigation and recording*
- 2. The programme for post investigation assessment*
- 3. Provision to be made for analysis of the site investigation and recording*
- 4. Provision to be made for publication and dissemination of the analysis and records of the site investigation*
- 5. Provision to be made for archive deposition of the analysis and records of the site investigation*
- 6. Nomination of a competent person or persons/organisation to undertake the works set out within the Archaeological Written Scheme of Investigation.*

B *The demolition/development shall take place/commence in accordance with the programme of archaeological works set out in the Written Scheme of Investigation approved under condition (A)*

C *The development shall not be occupied/used until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme of Investigation approved under condition (A) and the provision made for analysis and publication where appropriate.*

If planning consent is granted, I will be able to provide detailed advice concerning the requirements for the investigations and provide information on professionally accredited archaeological contractors who may be able to carry out the investigations.

1.1.2 British Pipeline Agency: Comments Received

Thank you for your correspondence regarding the above noted planning application.

Having reviewed the information provided, the BPA pipeline(s) is not affected by these proposals, and therefore BPA does not wish to make any comments on this application. However, if any details of the works or location should change, please advise us of the amendments and we will again review this application.

Whilst we try to ensure the information we provided is accurate, the information is provided Without Prejudice and we accept no liability for claims arising from any inaccuracy, omissions or errors contained herein.

1.1.3 Affinity Water: No objection, subject to conditions.

Thank you for notification of the above planning application. Planning applications are referred to us where our input on issues relating to water quality or quantity may be required.

You should be aware that the proposed development site is located within an Environment Agency defined groundwater Source Protection Zone 1 (SPZ1) corresponding to our Pumping Station (MILE). This is a public water supply, comprising a number of Chalk abstraction boreholes, operated by Affinity Water Ltd.

Provided that the below conditions are implemented and it has been demonstrated that public water supply will not be impacted, we would have no objections to the development.

Contamination through **Ground Works**:

If any works involving excavations are necessary, then the following condition needs to be implemented:

Condition 1

Prior to the commencement of the development (excluding access and investigation works), no works involving excavations shall be carried until the following has been submitted to and approved in writing by the Local Planning Authority in consultation with Affinity Water:

An Intrusive Ground Investigation to identify the current state of the site and appropriate techniques to avoid displacing any shallow contamination to a greater depth.

- A **Remediation Strategy/Report** if found to be needed following the results of the intrusive investigation detailing how contamination (if found) will be dealt with. The remediation strategy shall be implemented as approved with a robust pre and post monitoring plan to determine its effectiveness.
- A **Risk Assessment** identifying both the aquifer and the abstraction point(s) as potential receptor(s) of contamination including turbidity generation from groundworks.
- A **Foundations Works Method Statement and Risk Assessment** detailing the depth and type of excavations (e.g. piling) to be undertaken including mitigation measures (e.g. turbidity monitoring, appropriate piling design, off site monitoring boreholes etc.) to prevent or minimise any potential migration of pollutants including turbidity or existing contaminants such as hydrocarbons to public water supply. Any excavations must be undertaken in accordance with the terms of the approved method statement.
- **Acknowledgement of the need to notify Affinity Water of excavation works 15 days before commencement** in order to implement enhanced monitoring at the public water supply abstraction and to plan for potential interruption of service with regards to water supply

Reason: Excavation works such as piling have the potential to cause water quality failures due to elevated concentrations of contaminants through displacement to a greater depths and turbidity generation. Increased concentrations of contaminants, particularly turbidity, impacts the ability to treat water for public water supply.

Contamination **during construction**:

Construction works may exacerbate any known or previously unidentified contamination. If any pollution is found at the site, then works should cease immediately and appropriate monitoring and remediation will need to be undertaken to avoid any impact on water quality in the chalk aquifer.

Condition 2

If, during development, contamination not previously identified is found to be present at the site, then no further development shall be carried out until the following has been submitted to and approved in writing by the Local Planning Authority in consultation with Affinity Water:

- A **Remediation Strategy/Report** detailing how contamination will be dealt with. The remediation strategy shall be implemented as approved with a robust pre and post monitoring plan to determine its effectiveness.

Reason: To ensure that the development does not contribute to unacceptable concentrations of pollution posing a risk to public water supply from previously unidentified contamination sources at the development site and to prevent deterioration of groundwater and/or surface water.

Contamination through **Surface Water Drainage**:

Surface water drainage should use appropriate Sustainable Urban Drainage Systems that prevent the mobilisation of any contaminants where a direct pathway to the aquifer is present. This should use appropriate techniques that prevent direct pathways into the aquifer and that ensure sufficient capacity is provided for all surface water to be dealt with on site, preventing consequential flooding elsewhere.

Condition 3

Prior to the commencement of development (excluding access and investigation works), no works shall be carried out until the following has been submitted to and approved in writing by the Local Planning Authority in consultation with Affinity Water:

- A **Surface Water Drainage Scheme** demonstrating appropriate use of sustainable urban drainage systems that prevent the mobilisation of any contaminants ensuring protection of surface and groundwater.

Reason: Surface water drainage can mobilise contaminants into the aquifer through infiltration in areas impacted by ground contamination. Surface water also has the potential to become contaminated and can enter the aquifer through open pathways, either created for drainage or moved towards existing open pathways where existing drainage has reached capacity. All have the potential to impact public water supply.

Issues arising from any of the above can cause critical abstractions to switch off resulting in the immediate need for water to be sourced from another location, which incurs significant costs and risks of loss of supply during periods of high demand.

The construction works and operation of the proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk.

For further information we refer you to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".

Water efficiency

Being within a water stressed area, we expect that the development includes water efficient fixtures and fittings. Measures such as rainwater harvesting and grey water recycling help the environment by reducing pressure for abstractions in chalk stream catchments. They also minimise potable water use by reducing the amount of potable water used for washing, cleaning and watering gardens. This in turn reduces the carbon emissions associated with treating this water to a standard suitable for drinking, and will help in our efforts to get emissions down in the borough.

Infrastructure connections and diversions

There are potentially water mains running through or near to part of proposed development site. If the development goes ahead as proposed, the developer will need to get in contact with our Developer Services Team to discuss asset protection or diversionary measures. This can be done through the My Developments Portal (<https://affinitywater.custhelp.com>) or aw_developerservices@custhelp.com.

In this location Affinity Water will supply drinking water to the development. To apply for a new or upgraded connection, please contact our Developer Services Team by going through their My Developments Portal (<https://affinitywater.custhelp.com>) or aw_developerservices@custhelp.com. The Team also handle C3 and C4 requests to cost potential water mains diversions. If a water mains plan is required, this can also be obtained by emailing maps@affinitywater.co.uk. Please note that charges may apply.

1.1.4 Local Plans Section: Comments received

Outline application for the erection of up to 75 new dwellings, parking and landscaping with associated access onto Chalfont Road (Appearance, Layout, Landscaping and Scale as reserved matters). The application site is located wholly within the Metropolitan Green Belt.

The application site has not been allocated as a housing site by the Site Allocations Local Development Document and as such is not currently identified as part of the District's housing supply. The site should therefore be considered as a windfall site. Policy CP2 of the adopted Core Strategy (adopted 2011) states that applications for windfall sites will be considered on a case by case basis having regard to:

- i. the location of the proposed development, taking into account the Spatial Strategy*
- ii. the sustainability of the development and its contribution to meeting local housing needs*
- iii. infrastructure requirements and the impact on the delivery of allocated housing sites*
- iv. monitoring information relating to housing supply and the Three Rivers housing target.*

The Spatial Strategy states that new development will be directed towards previously developed land in the urban area of the Principal Town (Rickmansworth) which is identified as one of the most sustainable locations in the District. The site is not within a defined settlement (although is located adjacent to the secondary centre of Maple Cross) and is not previously developed land. The development would result in the net gain of up to 75 dwellings. The Council cannot currently demonstrate a five-year supply of housing land as required by the NPPF and currently has a 1.7-year housing land supply. The delivery of up to 75 dwellings would make a significant and positive contribution to much needed housing provision within the district. Additionally, there has been an undersupply of affordable housing within the district throughout the plan period and as such there is a pressing need for the delivery of affordable housing. The submitted design and access document states that development will include 50% affordable housing. Further detail, including housing mix, of the proposed affordable housing provision would be required at a later stage.

Paragraph 153 of the NPPF states that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 153 further sets out that very special circumstances will

not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. Paragraph 154 of the NPPF states that development in the Green Belt is inappropriate unless certain exceptions apply. Paragraph 154 of the NPPF sets out the following exceptions to inappropriate development in the Green Belt:

- a) buildings for agriculture and forestry;*
- b) the provision of appropriate facilities (in connection with the existing use of land or a change of use), including buildings, for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;*
- c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;*
- d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- e) limited infilling in villages;*
- f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and*
- g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed use including residential), whether redundant or in continuing use (excluding temporary buildings), which would not cause substantial harm to the openness of the Green Belt.*
- h) Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it. These are:*
 - i. mineral extraction;*
 - ii. engineering operations;*
 - iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
 - iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;*
 - v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
 - vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.*

Additionally, paragraph 155 of the NPPF sets out that the development of homes, commercial and other development in the Green Belt should also not be regarded as inappropriate where all the following apply:

- a) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;*
- b) There is a demonstrable unmet need for the type of development proposed;*
- c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and*
- d) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157*

Policy CP11 of the Core Strategy states that 'there will be general presumption against inappropriate development that would not preserve the openness of the Green Belt, or which would conflict with the purpose of including land within it'.

Policy CP3 of the Core Strategy states that the Council will require housing proposals to take into account the range of housing needs, in terms of size and type of dwellings as identified by the Strategic Housing Market Assessment (SHMA). The most recent version of the Local Housing Needs Assessment (LNHA) was finalised in 2024 and is the most recent update to the SHMA. The recommended mix for Three Rivers in terms of market housing, affordable home ownership and social/affordable rented housing identified in the LNHA is shown below:

It must be noted that Policy CP3 recognises that a proposed housing mix may need to be adjusted for specific schemes to take account of market information and specific site factors; where adjustment to the proportions is sought, applications should explain how relevant factors have contributed to the mix of housing proposed.

Policy CP4 of the Core Strategy requires 45% of all new housing to be provided as Affordable Housing, unless it can be clearly demonstrated with financial evidence that this is not viable. The application would result in a net gain of up to 75 dwellings and subsequently would be required to contribute to affordable housing provision. For sites delivering a net gain of ten or more dwellings (i.e. the proposal site), on-site provision will be required. Policy CP4 states that in assessing affordable housing requirements, the Council will treat each case on its merits, taking into account site circumstances and financial viability. A viability assessment which demonstrates that the scheme would be financially unviable will be required if applicable. The viability assessment will be assessed by an independent financial advisor and following this, the proposal's conformity with Policy CP4 can be fully considered. Policy CP4 sets out that the Council will "as a guide, seek 70% of the affordable housing provided to be social rented and 30% to be intermediate".

On 24th May 2021, the Government published a Written Ministerial Statement (WMS) to set out the Government's plans for the delivery of First Homes defining the product and changes to planning policy. Following publication of the WMS, Planning Practice Guidance (PPG) was updated to reflect the WMS and formed a material consideration in decision making. As a result of the introduction First Homes and changes to national policy, the Council released a First Home Policy Position Statement. This Policy Position Statement amended the tenure mix for affordable housing under Policy CP4 of the Core Strategy (2011) as:

- 25% First Homes*
- 70% social rented, and*
- 5% intermediate*

However, changes were made to national policy following the publication of the newest version of the NPPF in December 2024. Within paragraph 6 of the NPPF, reference to the Written Ministerial Statement on Affordable Homes (24th May 2021), which contained policy on First Homes, has been removed and the prescriptive requirement that 10% of the total number of homes to be available for affordable home ownership as set out in former paragraph 66 has been deleted. As such, the Council will be reviewing its Policy Position Statement. It is advised that development complies with Policy CP4 as written, apportioning 70% of the affordable housing provision as social rented and 30% as intermediate.

1.1.5 Hertfordshire County Council - Minerals & Waste Planning Team: Comments received

I am writing in response to the above planning application insofar as it raises issues in connection with minerals and waste matters.

Minerals

In relation to minerals, the site falls entirely within the 'Sand and Gravel Belt' as identified in Hertfordshire County Council's adopted Minerals Local Plan 2002 – 2016.

The Sand and Gravel Belt is a geological area that spans across the southern part of the county and contains the most concentrated deposits of sand and gravel throughout Hertfordshire. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits at the application site.

The Minerals Planning Authority identifies the entirety of the Sand and Gravel Belt together with the identified resource blocks, as Mineral Consultation Areas.

Planning applications submitted to the District and Borough Councils for non-minerals development that fall within a Mineral Consultation Area (other than applications which meet the 'excluded development' criteria), may not be determined until the county council has been given the opportunity to comment on whether the proposal would unacceptably sterilise mineral resources.

In accordance with paragraph 225 of the NPPF (Dec 2024) development proposals in Mineral Safeguarding Areas that might constrain potential future use for mineral working should not normally be permitted.

After reviewing the application, the Minerals Planning Authority does not consider that the proposal would have the potential to unacceptably sterilise mineral resources. It is not necessary to investigate the potential for the prior extraction of mineral resources at this site.

Whilst prior extraction is not necessary, there may still be opportunities to utilise sand and gravel resources that are found during site preparation works, should any deposits be uncovered that are of a suitable quality.

Opportunistic extraction refers to cases where preparation of a site for built development, such as excavating the foundations and footings or landscaping works, may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development.

The Minerals Planning Authority would like to encourage the opportunistic extraction and subsequent use of sand and gravel deposits within developments wherever possible. Opportunistic use of minerals will reduce the need to import sand and gravel to the site and make sustainable use of these valuable resources.

Waste

Government policy seeks to ensure that all planning authorities take responsibility for waste management. This is reflected in the County Council's adopted waste Development Plan Documents (DPDs). In particular, these documents seek to promote the sustainable management of waste in the county and encourage Local Planning Authorities to have regard to the potential for minimising waste generated by development.

The National Planning Policy for Waste (October 2014) sets out the following:

'When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:

- the likely impact of proposed, non- waste related development on existing waste management facilities, and on sites and areas allocated for waste management,*

is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;

- *new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service;*
- *the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.'*

The supporting documents to this application, specifically the Energy & Sustainability statement, make no reference to the adopted Waste Core Strategy and Development Management Policies DPD (2012). The policies in the adopted DPD (2012) that relate to this proposal, and which must be considered by the Local Planning Authority in determining the application, include Policy 1: Strategy for the Provision for Waste Management Facilities (namely the penultimate paragraph of the policy) and Policy 12: Sustainable Design, Construction and Demolition.

Many of the policy requirements can be met through the imposition of planning conditions.

As a general point, built development should have regard to the overall infrastructure required to support it, including where appropriate a sufficient number of waste storage areas that should be integrated accordingly and facilitate the separate storage of recyclable wastes.

Waste Policy 12: Sustainable Design, Construction and Demolition requires all relevant construction projects to be supported by a Site Waste Management Plan (SWMP). The section on the Circular Economy and Waste within the Energy & Sustainability statement notes that a SWMP will be prepared prior to commencement of the project. The county council welcomes this commitment.

The Waste Planning Authority would expect to see a SWMP prepared to support this application. The SWMP must be prepared and agreed in consultation with the Waste Planning Authority prior to commencement of the project. The SWMP must be implemented throughout the duration of the project, from initial site preparation works to final completion of the construction phase.

By preparing a SWMP prior to commencement, early decisions can be made relating to the management of waste arisings and building supplies made from recycled and secondary materials can be sourced, to help alleviate the demand for primary materials such as virgin sand and gravel. Early planning for waste arisings will help to establish what types of containers/skips are required for the project and when segregation would be best implemented for various waste streams. It will also help in determining the costs of removing waste from the site.

As a minimum, the SWMP should include the following:

Project and People

- *Identification of the client*
- *Identification of the Principal Contractor*
- *Identification of the person who drafted the SWMP*
- *Location of the site*

- *An estimated cost of the project*
- *Declaration that the client and contractor will comply with the requirements of Duty of care that materials will be handled efficiently and waste managed appropriately (Section 34 of Environmental Protection Act 1990 and Environmental Protection (Duty of Care) Regs 1991)*

Estimating Waste

- *A description of the types of waste that are expected to arise on site (recorded through the use of 6-digit European Waste Catalogue codes) and an estimated quantity for each of the types (in tonnes)*
- *Waste management actions for each waste type (i.e., will the waste be re-used or recycled (on-site or off-site?), recovered or disposed of)*

Space for Later Recordings

- *Space for the recording of actual figures against the estimated figures*
- *Space for the recording and identification of those responsible for removing the waste from site and details of the sites they will be taking it to*
- *Space to record explanations for any deviations from what has been set out in the SWMP, including explanations for differences in actual waste arisings compared to the estimates*

As a SWMP has not been produced at the planning application stage, the Waste Planning Authority request the following pre-commencement condition be attached to any approved planning application:

Condition:

No development shall take place until a Site Waste Management Plan (SWMP) for the site has been submitted to the Local Planning Authority and approved in consultation with the Waste Planning Authority. The SWMP should aim to reduce the amount of waste produced on site and should contain information including estimated types and quantities of waste to arise from construction and waste management actions for each waste type. The development shall be carried out in accordance with the approved SWMP.

Reason: To promote the sustainable management of waste arisings and contribution towards resource efficiency, in accordance with Policy 12 of the Hertfordshire Waste Core Strategy and Development Management Policies Development Plan Document (2012).

1.1.6 Housing Officer: No objection.

Policy CP4 of the Adopted Core Strategy requires that 45% of new housing should be provided as Affordable Housing, unless it can be clearly demonstrated through financial evidence that this is not viable. As a guide, the tenure split should be approximately 70% rented (of which 70% should be social rent and 30% affordable rent) and 30% affordable home ownership (with an indicative split of 50% First Homes and 50% shared ownership).

The Local Housing Market Assessment (2024) outlines the recommended proportions for housing mix in development proposals submitted to Three Rivers District Council. These proposals should generally aim for a mix of 19% 1-bed units, 39% 2-bed units, 30% 3-bed units, and 13% 4-bed units.

However, the identified need for affordable housing, based on the current housing register and the family composition of customers in temporary accommodation

provided by the Council, suggests the following updated preferred mix: 20% 1-bed units, 45% 2-bed units, 30% 3-bed units, and 5% 4+ bed units. The primary need is for 2-bed, 4-person units, as there is a significant demand for family-sized accommodation to ensure families in temporary housing are offered permanent, suitable properties in a timely manner.

In the absence of the tenure information, I can confirm that Housing Services would generally support this application in principle, on the basis that 70% of the affordable housing to be provided is at social rent and the size of dwellings provided fulfils our current requirements.

1.1.7 Herts Ecology: Initial objection raised but overcome subject to conditions:

Summary of Advice:

- In line with the recommendations of the ecology report, surveys for reptiles, GCN (eDNA), and bats should be undertaken **prior to determination**.
- No trees with roosting features should be removed without further assessment for bats.
- BNG sufficient.
- **Condition 1** – CEMP.
- **Condition 2** – Pre-commencement badger survey.
- **Condition 3** – Species Enhancement Plan.
- **Condition 4** – HMMP.

Supporting documents:

- Preliminary Ecological Appraisal (Urban Edge Environmental Consulting, March 2025).
- Biodiversity Net Gain Assessment (Urban Edge Environmental Consulting, March 2025).
- Biodiversity metric.

Comments:

The site mostly comprises arable land, which is of little ecological value, some scrub, grassland, trees, and hedgerows. The boundary features are of most value for wildlife, and an area of deciduous woodland is adjacent to the southern boundary. We have no existing species or habitat data for this site.

A Preliminary Ecological Appraisal (PEA) has been submitted in support of the application (Urban Edge Environmental Consulting, March 2025). We have no fundamental objections to the development, however there is currently insufficient information on protected species to advise determination of the application.

Great crested newts: There are two ponds present 225m and 410m from the site. Given the distance of P2 to the site and that GCN tend to use terrestrial habitat within 250m of their breeding pond, I do not consider P2 a constraint to the development, and further surveys for this pond are not necessary.

P1 could not be assessed during the PEA, therefore it has been recommended in the ecology report that eDNA samples should be taken from this pond to determine GCN presence/absence. Great crested newts and their habitats are fully protected under national and international law. Sufficient information on the status of GCN is therefore required prior to determination to ensure the LPA can consider the impact of the proposal on this species and discharge their legal obligations under the Conservation of Habitats and Species Regulations 2019 (as amended).

Consequently, I advise that the eDNA survey recommended in the ecology report should be undertaken prior to determination. If GCN are confirmed to be present in this pond, then further surveys to determine population sizes may be required, and a license sought from Natural England.

The results of the eDNA survey should be submitted to the LPA for approval prior to determination.

Bats: Most of the trees onsite were deemed to be in good condition, and did not possess any visible roosting features appropriate for roosting bats. Some suitable trees are present in the central section of one of the hedgerows (H2), however since this part of the hedgerow is to be unaffected, no further assessments have been recommended. **Under no circumstance should any tree identified to possess roosting features be removed without further assessment.**

Most of the habitats onsite were deemed to be of low suitability for foraging and commuting bats, therefore bat activity surveys of the whole site were deemed to be disproportionate, which I do not dispute. It has been noted in the report that static automated monitoring of H2 will be carried out to determine bat activity.

Reptiles: The site was deemed to be suitable for reptiles with habitats such as scrub, vegetated strips, rough grassland, and hedgerows present. Presence/absence surveys have been recommended. **These surveys should be undertaken prior to determination, and the results incorporated into a reptile report which should be submitted to the LPA for approval.**

Badgers: No evidence of badgers was found during the PEA, however habitats appropriate for sett building were present. A pre-commencement badger survey has been recommended.

Hazel Dormouse: Surveys for the hazel dormouse have been recommended. However, given the lack of records in recent years in Hertfordshire, hazel dormouse surveys are not expected to form part of this application.

Nesting birds: There is some nesting bird habitat onsite in the form of trees and scrub. All wild birds, their nests, eggs and young are afforded protection and in general terms it would be an offence to kill, injure or displace breeding birds and their young. To reduce the risk of an offence being committed a precautionary approach is required and, consequently, **I recommend the following Informative is added to any consent:**

“In order to protect breeding birds, their nests, eggs and young, development should only be carried out during the period October to February inclusive. If this is not possible then a pre-development (i.e. no greater than 48 hours before clearance begins) search of the area should be made by a suitably experienced ecologist. If active nests are found, then works must be delayed until the birds have left the nest or professional ecological advice taken on how best to proceed”.

Biodiversity net gain: This application is subject to mandatory biodiversity net gain. A biodiversity metric and biodiversity net gain assessment have been submitted.

The baseline habitat units stand at 8.02BU, with the onsite net change being 1.08 which equates to a net gain of 13.47%. Baseline habitats comprise cropland, scrub, trees, and modified grassland. The net gain is owed to the creation of other neutral grassland, mixed scrub, SuDS, broadleaved woodland, modified grassland, ponds, and urban trees. The habitat creation corresponds to the landscape masterplan.

The hedgerow baseline units stand at 7.63BU, with the onsite net change being 0.95BU, equating to a net gain of 12.49%. Part of H2 will be retained, however the rest of the hedgerows onsite will be lost. The loss of these hedgerows will be compensated by the planting of 0.5km of native hedgerow, and 0.37km of species rich hedgerow with trees. All trading rules have been met for habitats and hedgerows.

The minimum requirement of a completed baseline has been demonstrated. The biodiversity gain condition will apply to this application, whereby a biodiversity gain plan will be submitted as part of this condition. We advise that the government template for the biodiversity gain plan should be used, and a metric which corresponds with the gain plan should be submitted alongside this gain plan.

The claims for BNG for this site would be considered as 'significant' net gain. This is because of the creation of medium and high distinctiveness habitats. In this instance the LPA are advised to secure this significant net gain for the respective habitat units via legal agreement whether through an S106 agreement or conservation covenant.

Given that BNG for this site is significant, if the LPA were minded granting permission, a Habitat Management and Monitoring Plan (HMMP) should be added as a Condition of approval. This shall demonstrate how the habitat enhancement and creation, and subsequent target habitat conditions on-site will be created, enhanced, and monitored over 30 years following the completion of the capital works required to create them. It is recommended that the HMMP should be in line with the HMMP template produced by DEFRA. Considerations should also be given within any legal agreement to secure resources to allow adequate monitoring over the 30-year period.

Conditions:

Condition 1 - A Construction Environmental Management Plan (CEMP) should be submitted to the LPA as a Condition of approval. It should be noted that dependent on the results of the further species surveys above, additional species-specific measures may be recommended to be included in the CEMP.

No development shall take place (including demolition, ground works, vegetation clearance) until a Construction Environmental Management Plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Condition 2 – Pre-commencement badger survey.

No development shall take place (including demolition, ground works, vegetation clearance) until a badger survey, no earlier than two months prior to the commencement of the development, is carried out. This survey shall determine whether any new badger setts have been excavated onsite, and within 30m of the site. The results of this survey shall be submitted to the LPA for approval.

Condition 3 – Species Enhancement Plan.

No development shall take place (including vegetation clearance, demolition and ground works), until a Species Enhancement Plan has been submitted. It will include graphical plan, setting out the number, type and position of enhancement features to be incorporated into the design scheme. This plan shall be submitted to the Local Planning Authority for written approval and the development shall be carried out in accordance with the approved plan unless otherwise agreed in writing with the Local Planning Authority. The Species Enhancement Plan shall include the following:

- One cluster of integrated swift bricks per dwelling.
- One integrated bat box per dwelling.
- Hedgehog highways
- Wildlife friendly planting.

Condition 4 – Habitat Management and Monitoring Plan (HMMP):

The development shall not commence until a Habitat Management and Monitoring Plan (HMMP) aligning with the HMMP template produced by DEFRA and prepared in accordance with the approved Biodiversity Gain Plan has been submitted to, and approved in writing by, the local planning authority. The HMMP shall include:

1. A non-technical summary;
2. The roles and responsibilities of the people or organisation(s) delivering the HMMP;
3. The planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
4. The management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
5. The monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority.

The created and/or enhanced habitat specified in the approved [HMMP] shall be managed and maintained in accordance with the approved [HMMP].

1.1.8 Herts Ecology - Second Consultation:

Further to our comments dated 19/05/2025, an ecology Technical Note (Urban Edge Environmental Consulting, July 2025) has now been submitted.

We previously advised that there was insufficient information on great crested newts and reptiles to advise determination of the application. The below advice will supersede any prior comments on reptiles and GCN, however all advice relating to the CEMP, badger pre-commencement survey, bats, nesting birds, Species Enhancement Plan, and BNG still stands, and should still be followed.

Great crested newts: An eDNA sample was taken from P1 returning a negative result which indicates the likely absence of GCN in the pond. Therefore, no further GCN surveys are required for the application to proceed. **In the unlikely event that**

GCN are found during the works, I advise the following informative should be added to any permission granted:

“If great crested newts, or evidence of them, are discovered during the course of works, work must stop immediately, and advice sought on how to proceed lawfully from an appropriately qualified and experienced Ecologist or Natural England to avoid an offence being committed”.

Reptiles: Reptile surveys were carried out in between April and June 2025. No reptiles or evidence of them was found during the surveys, indicating the likely absence of reptiles onsite. No further surveys are required for this group, however, to ensure an offence is not committed, **I advise the following informative should be added to any permission granted:**

“To avoid the killing or injuring of wildlife during development, best practice should keep any areas of grass as short as possible and any longer, ruderal vegetation should be cleared by hand. To avoid creating refugia that may be utilised by wildlife, materials should be carefully stored on-site on raised pallets and away from the boundary habitats. Any trenches on site should be covered at night or have ramps to ensure that any animals that enter can safely escape, and this is particularly important if excavations fill with water. Any open pipework with an outside diameter greater than 120mm must be covered at the end of each working day to prevent animals entering / becoming trapped.”

1.1.9 Hertfordshire County Council – Lead Local Flood Authority: Initial objection raised but overcome subject to conditions:

This is an Outline planning application for up to 75 new dwellings, parking and landscaping.

We are concerned about the existing surface water flow path at the entrance of the site and the impacts the proposed access road will have. We require further evidence that the flow path is not being adversely impacted, and that safe access and egress is being provided to the proposed development. While the majority of the site is at low risk of flood risk, we recommend that you as the Local Planning Authority ensure that you are satisfied that the sequential test has been passed.

We are also concerned that finished floor levels are not clear within the documentation. We would like to remind the applicant that finished floor levels must be set to the statutory 300mm above the maximum design water level and 150mm above the external ground levels. Additionally, the parameters for the calculations are unclear. All calculations should use a CV value of 1 and include 10% urban creep allowance.

We **object** to this planning application in the absence of an acceptable Flood Risk Assessment and Drainage Strategy relating to:

- *The proposed SuDS are likely to increase the risk of flooding elsewhere.*
- *The development is not in accordance with NPPF, PPG or Three Rivers local policies including Three Rivers SFRA Level 1.*

Reason: To prevent flooding in accordance with National Planning Policy Framework paragraphs 181, 182 and 187 by ensuring the satisfactory management of local flood risk, surface water flow paths, storage and disposal of surface water from the site in

a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

We will consider reviewing this objection if the issues highlighted on the accompanying Planning Application Technical Response document are adequately addressed.

1.1.10 Hertfordshire County Council – Lead Local Flood Authority Second Consultation:

The following documents have been reviewed.

- *Report: Flood Warning and Evacuation Plan, prepared by Waterman, September 2025, REF 21050109-WAT-EWE-XX-RP-N-930100-S0-P01-FWEP REV S2-P01*
- *Report: Flood Risk Assessment and Drainage Strategy for Land to the North of Chalfont Road, prepared by Waterman, September 2025, REF 21050-WAT-EWE-XXRP-N-930100-S2-P03-FRADS REV S2-P03*
- *Report: Flood Risk Assessment and Drainage Strategy for Land to the North of Chalfont Road, prepared by Waterman, 07 March 2025, REF 21050-WAT-EWE-XX-RP-N-930100-S2-P02-FRADS REV S2-P0*

This is an Outline planning application for up to 75 new dwellings, parking and landscaping.

We previously responded to this reference on 30 May 2025, outlining several points of objections. Post this, the LLFA met with the applicant and outlined an agreed approach. Further documentation was required, including a Flood Warning and Evacuation Plan. The LLFA have reviewed the documentation as submitted and have the following comments to make.

The applicant has provided a Flood Risk Assessment (FRA) and a Drainage Strategy and a Flood Warning Evacuation Plan, as listed in the Annex. These are to account for the local flood risk issues and surface water drainage at this location. Following a review of the submitted documents, the details are in accordance with NPPF and Local Plan policy Three Rivers SFRA Level 1.

*The LLFA remains concerned with safe access and egress from the site during a surface water flood event however we note that this is outside of the red line boundary of the site. We would ask the LPA to consider the Sequential Test on this basis, but we have **no objection subject to conditions being attached to any consent** if this application is approved.*

We suggest the following wording:

Condition 1:

Prior to or in conjunction with the submission of each reserved matters application, in accordance with the submitted FRA and or Drainage Strategy (Flood Risk Assessment and Drainage Strategy | prepared by Waterman | September 2025 | Ref: 21050-WAT-EWE-XX-RP-N-930100-S2-P03-FRADS | Ref: P03), detailed designs of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed with the Local Planning Authority. The approved scheme will be implemented prior to the first occupation of the development. The scheme shall address the following matters:

- i. Detailed infiltration testing in accordance with BRE Digest 365 (or equivalent) along the length and proposed depth of the proposed infiltration feature/s,*

Or:

- ii. *If infiltration is proven to be unfavourable, then Greenfield runoff rates for the site shall be agreed with the Lead Local Flood Authority. The post development runoff rates will be attenuated to the equivalent Greenfield rate for all rainfall events up to and including the 1% Annual Exceedance Probability (AEP). The discharge location for surface water runoff will be confirmed to connect with the wider watercourse network.*
- iii. *Provision of surface water attenuation storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 3.33% AEP (1 in 30 year) and 1% AEP (1 in 100) rainfall events (both including allowances for climate change).*
- iv. *Detailed designs, modelling calculations and plans of the of the drainage conveyance network in the:*
 - *3.33% AEP (1 in 30 year) critical rainfall event plus climate change to show no flooding outside the drainage features on any part of the site.*
 - *1% AEP (1 in 100 year) critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any flooding outside the drainage features, ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development. It will also show that no runoff during this event will leave the site uncontrolled.*
- v. *The design of the detention basin will incorporate an emergency spillway and any drainage structures include appropriate freeboard allowances. Plans to be submitted showing the routes for the management of exceedance surface water flow routes that minimise the risk to people and property during rainfall events in excess of 1% AEP (1 in 100) rainfall event plus climate change allowance.*
- vi. *Finished ground floor levels of properties are a minimum of 300mm above expected flood levels of all sources of flooding (including the ordinary watercourses, SuDS features and within any proposed drainage scheme) or 150mm above ground level, whichever is the more precautionary.*
- vii. *Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge.*
- viii. *A maintenance and management plan detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for the lifetime of the development.*

Reason: To prevent flooding in accordance with National Planning Policy Framework paragraphs 181,182 and 187 by ensuring the satisfactory management of local sources of flooding surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

Condition 2:

Construction shall not begin until a detailed construction phase surface water management plan for the site has been submitted to and approved in writing by the Local Planning Authority. The scheme shall subsequently be carried out in accordance with the approved details.

Reason: To ensure that the construction of the site does not result in any flooding both on and off site and that all Surface water Drainage features are adequately protected.

1.1.11 Hertfordshire County Council – Highway Authority: Initial objection raised but overcome subject to conditions:

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority recommends that permission be refused for the following reasons:

- *Further consideration is required regarding the site access with continues footpath access and visibility splays not clear due to overgrown vegetation and trees that reduce the splays.*
- *No details have been submitted with regards to the continuous footpath access to the site and Footpath 009. These need to be presented as drawings for review by the county.*
- *Calculation used for parking provision is incorrect and the proposed number of spaces are higher than the LPAs standards for a residential development.*
- *Queue length survey data has not been presented in the appendices to the TA, this needs to be provided to validate the traffic models*

Proposal

Outline planning application for up to 75 new dwellings, parking and landscaping with associated access onto Chalfont Road (Appearance, layout, landscaping and scale as reserved matters).

Site Description

The proposed scheme consists of the development of 75 houses on the site located to the northwest of Maple Cross.

The site is about 3.92 Hectares and is an undeveloped agricultural field. The site is bounded to the south and west by Chalfont Road, to the east by the rear of residential properties along Oakhill Road, and to the north by additional agricultural land. The site is approximately 400 metres west of Maple Cross Village centre.

Chalfont Road is a two-way single-carriageway road and forms the southern boundary of the site.

Chalfont Road is subject to a 30 miles per hour speed limit in the vicinity of the site. To the east, Chalfont Road connects with the Chalfont Road/Denham Way/Maple Lodge Close crossroads.

Denham Way provides access to Junction 17 of the M25 via the Maple Cross Roundabout to the north of the site. The M25 provides access to Greater London and the wider highway network.

Analysis

In its earlier response, Hertfordshire County Council (HCC) provided comments in relation to the documentation submitted in March 2025.

Below are the requirements highlighted in the previous response:

- *Review of relevant policies, guidelines and design standards*

- *Assessment of the current infrastructure provision at the nearest bus stops and incorporate potential improvement proposals.*
- *Review of the most recent five-year personal injury collision data obtained directly from the relevant authority.*
- *Upgrading the site access junction to a 'Copenhagen Style' arrangement prioritising pedestrian safety and convenience.*
- *Submitting detailed design of the proposed pedestrian access for further review.*
- *It was also recommended that the applicant discuss any improvement proposals with the HCC PRow officer.*
- *Reducing level of car parking to align with the requirements set out in the Three Rivers District Council Development Management Policies.*
- *Swept path analysis for service vehicles approaching from the east, demonstrating that such vehicles can safely enter and exit the site in a forward gear.*
- *Kerb line and green areas to be kept clear of vehicle overrun and revised layouts must ensure that swept paths remain within hardstanding. More details were required to review the junction modeling.*
- *More comprehensive and robust Travel Plan is required.*
- *Construction Traffic Management Plan will be required*
- *A condition will be required to provide electric vehicle charging points for each residential dwelling.*
- *Properly marked disabled parking spaces on the plan.*

The applicant has submitted additional documentation in support of this application:

- *N03 - Highways Response to HCC Consultation (Dated 4 July 2025)*
- *Proposed Access Arrangements (DWG. 2209054-01 Rev. C)*

Policy Review

The latest submission, 'N03 - Highways Response to HCC Consultation', hereafter referred to as the Technical Note (TN), does not include a review of the national and local policies and guidance identified earlier in the previous HCC response.

Accessibility

Walking and Cycling

The Applicant notes that a 2.0-metre-wide footway is provided on the northern side of Chalfont Road, to the east of the site, offering a direct pedestrian route towards the centre of Maple Cross. However, this footway is partially obstructed by overgrown vegetation and terminates approximately 220 metres west of the proposed site access.

A pedestrian refuge island, with dropped kerbs and tactile paving, is located approximately 180 metres east of the site and facilitates access to local bus stops. Further east, signal-controlled pedestrian crossings are available at the Chalfont Road/Denham Way/Maple Lodge Cross junction, providing connectivity to local amenities.

In addition, the Applicant highlights that a number of Public Rights of Way (PRow) are accessible in proximity to the site. These include Footpath 008 and Footpath 009, located on the south-western side of Chalfont Road near the site's south-western boundary. Footpath 009 provides pedestrian access to Chalfont Common.

The TA also highlights that the site is situated approximately 400 metres west of Maple Cross village centre and benefits from proximity to a range of local amenities. These include a Morrisons Daily convenience store, recreational facilities, and a post office. Maple Cross JMI & Nursery School is located approximately 1 kilometre to the south of the site, while The Reach Free School (a secondary school) lies approximately 1.6 kilometres to the north-east, equivalent to a 22-minute walk. Walking isochrones presented in Figure 3.4 of the Transport Assessment illustrate the range of local amenities and facilities accessible within a 5 to 25-minute walking distance.

The TA also identifies shared foot/cycleways on the eastern side of Denham Way, providing a direct route towards Rickmansworth, forming part of the Maple Cross to Rickmansworth Cycle Route.

National Cycle Network (NCN) Route 6 is located approximately 2.8 kilometres east of the site and provides connections north to Rickmansworth and south to Uxbridge. Additionally, the Milton Route Cycle Trail lies to the west of the site, offering a circular cycling route between Chalfont St Peter and Amersham. Figure 3.5 of the TA presents cycling isochrones and highlights the accessible local facilities within a 5 to 25-minute cycling distance.

The applicant has proposed widening of the existing footway along Chalfont Road to 2 metres, which will enhance pedestrian connectivity to the surrounding area. Additionally, tactile paving and dropped kerbs are provided at the Oakhill Road crossing point, improving accessibility for all users, including those with mobility impairments. This is considered acceptable.

Additionally, a pedestrian link will also be provided to Footpath 009 which can be accessed from the southern side of Chalfont Road at the south-western corner of the site.

Stage 1 Road Safety Audit

HCC Road Safety team has reviewed the RSA1 and provided commentary presented below:

RSA Problem Reference: 2.3

Consideration: Obstructed pedestrian route may lead to pedestrians being struck.
HCC Road Safety Review comment: The designer's response is considered acceptable.

In addition to the issues identified within the Road Safety Audit, the Highway Authority (HCC) has outlined the following relevant concerns.

RSR HCC Problem Reference HCC: 1

Consideration: Signage

HCC Road Safety Review comment: The proposed widening of both the carriageway and footway adjacent to No. 70 Chalfont Road will result in a reduction of the existing verge. The reviewer is concerned that this may compromise the available clearance for the warning signs currently installed within the verge.

RSR HCC Problem Reference HCC: 2

Consideration: Signage

HCC Road Safety Review comment: The existing "Pedestrians in Carriageway" warning sign located outside No. 70 Chalfont Road is currently oriented incorrectly and should be repositioned to face westbound traffic.

RSR HCC Problem Reference HCC: 3

Consideration: Footpath 009

HCC Road Safety Review comment: The proposed works include the removal of vegetation to establish an appropriate visibility splay at the junction where the new development's footway link connects to Chalfont Road. However, no corresponding visibility improvements have been proposed on the opposite side of Chalfont Road, where pedestrians will be expected to cross from footpath 009, in order to access the new footway link.

In addition, the surfacing specification of the new footway link has not been provided. Depending on the construction type, this may inadvertently encourage users, particularly those with limited mobility who are unable to access footpath 009, to continue their journey along a route that is not suitably designed for their needs.

The HCC assesses the risk of a reduction in the level of road safety associated with the development proposal as Low Risk of reduction in service level. However, HCC will need to check that all proposed amendments in the designer's response, which have been accepted by the Reviewer, have been implemented in the design.

Public Transport

Accessibility by Bus

HCC in its previous response highlighted that bus stops on Hornbill Road (Long Croft Road and Ladywalk) and Longcroft Road (Pinchfield) have only flag and pole arrangements and lack Kassel kerbing, shelter, seating etc. and therefore recommended assessing the current infrastructure provision at the nearest bus stops and incorporate potential improvement proposals, including but not limited to pedestrian crossings, Kassel kerbing, seating, and a real-time information system, to enhance the attractiveness of public transport.

The submitted TN argues that the Long Croft Road bus stop, being the closest and serving both directions of travel, is the most practical option for residents, making it unlikely they would bypass it in favour of more distant stops. As such, the applicant has proposed to provide a pedestrian crossing on Hornhill Road in the form of dropped kerbs and tactile paving adjacent to the Long Croft Road bus stop to facilitate access to the bus stop. Kassel kerbing is also proposed at this bus stop. (Reference Appendix of TN, DWG. 2209054-05).

While the feasibility of a shelter was explored it the applicant confirms that insufficient footway width prevents its delivery. The Highway Authority considers the proposed infrastructure improvements on Hornbill Road to be acceptable.

Accessibility by Rail

The closest railway station to the site is Rickmansworth railway station, located approximately 5 kilometres north-east of the site, which equates to a 20-minute cycle or can be accessed via bus routes 320, 322, 724 and R1. Rickmansworth railway station provides frequent services to Aylesbury and London Marylebone.

Highway safety

The applicant has submitted additional Personal Injury Collision (PIC) data obtained from HCC, included at Appendix C of the Technical Note. This dataset covers the most recent five-year period (2019–2024). The Technical Note confirms that the updated PIC data does not identify any additional collisions within the study area beyond those previously reported in the Transport Assessment. Accordingly, no

further mitigation measures are considered necessary. This is considered acceptable.

Highway Layout

Vehicular Access

Access to the site is proposed via a new priority junction onto Chalfont Road at the south-eastern corner of the site.

Chalfont Road provides connection between the proposed development site and the M25 to the west, and Denham Way (an arterial route) to the east. The carriageway measures approximately 9 metres in width to the east of the site. However, from the site boundary extending westwards, the carriageway narrows significantly to approximately 3 metres in width.

The applicant has proposed widening Chalfont Road by increasing the width of the carriageway to 5.5 metres and the northern footway to 2 metres at the site access, extending for a short distance towards the east. About 57m to the east, the Chalfont Road features a chicane, reducing the width of the carriageway to 3m.

The access arrangements have been designed with a 5.5-metre-wide carriageway along with a 2m wide footway. (DWG. 2209054-01 C). However, in its previous response the Highway Authority recommended the site access junction to be upgraded to a 'Copenhagen Style' arrangement prioritising pedestrian safety and convenience.

In the TN, the applicant highlights that as there is no footway on the western side of Chalfont Road, pedestrian movements at the site access are not anticipated. Instead, pedestrians will use the eastern footway and internal routes within the development, linking to Footpath 009. On this basis, a Copenhagen crossing at the site access is not considered necessary, with internal pedestrian crossings to be designed at the reserved matters stage in accordance with Hertfordshire County Council's Place and Movement Guidance.

The Highway Authority observes that a continuous footway exists to the west of the proposed site access; however, this section is currently overgrown with vegetation and terminates approximately 100 metres short of the connection to Footpath 009.

The Road Safety Team raised concerns that the absence of a specified surfacing standard for the new footway link may inadvertently encourage continued use of a route unsuitable for users with limited mobility.

It is also noted that the concerns previously raised by HCC regarding the loss of trees have not been discussed within the TN.

The applicant has conducted ATC survey and recorded 85th percentile vehicle speeds in excess of the posted speed of 30mph. The eastbound speed recorded as 33.6mph while the westbound recorded a speed of 33mph. The visibility splay (DWG. 2209054-01 C) provided are 2.4m by 50m to the east of the proposed site access and 2.4m by 51m to the west. This is considered acceptable.

However, the Arboriculture Impact Assessment (TF1267-FAB-00-XX-RP-G-8301) highlights that the proposal will result in the loss of 1 tree and 3 groups (all categorised as C and U category).

Additionally, the partial removal of 2 groups (both categorised as C category). The proposed access and associated visibility splays require the removal of T20 and approx. 18 trees within G18.

Furthermore, The Arboriculture Impact Assessment report states that for the proposed apron area and maintenance access of the SuDS area the further removal of a section of G18 is required (approx 27.8m²).

It is re-iterated from the Pre-app note that HCC's Highways Tree Management Strategy (2024) states that "Highways do not remove trees that are considered to be healthy and contributing positively to the Highway environment. Highways will only remove trees on the advice of our own arboriculturists, if a select set of criteria are met." Therefore the tree survey would assist in identifying whether or not the proposals are acceptable and in accordance with the TMS.

Internal Layout

The Illustrative Landscape Master Plan (DWG. D3332-FAB-00-XX-DR-L-5000 Rev. P01) demonstrate the road network layout within the proposed development site.

The Transport Assessment highlights that the proposed internal road network will be formed of low speed and lightly trafficked residential streets with carriageway widths of 5.5 metres or 4.8 metres which render them suitable for on-carriageway cycling in accordance with LTN 1/20. The Highway Authority recommends that, at the detailed design stage, the internal road network should be designed in accordance with Hertfordshire County Council's Place and Movement Guidance to ensure safe and accessible movement for all users.

Measures to prevent surface water runoff onto the public highway will need to be demonstrated.

Any works within the highway boundary (including alterations to the footway) will need to be secured and approved via an s278 Agreement with HCC.

Pedestrian/Cycle Access

A 2-metre-wide footway is proposed on the eastern side of the access road to connect with the existing footway along the northern side of Chalfont Road. The proposals include widening the existing footway along Chalfont Road, between the site access and the Oakhill Road/Chalfont Road junction, to 2 metres to enhance pedestrian connectivity to the local area. An informal crossing point, featuring dropped kerbs and tactile paving, will be provided across Oakhill Road to the east of the site access.

The Illustrative Landscape Master Plan (DWG. D3332-FAB-00-XX-DR-L-5000 Rev. P01) demonstrate additional pedestrian linkages to the existing PRoWs including Footpath 008 and Footpath 009 located on the south-west of the proposed site.

Pedestrian access will be provided throughout the site in the form of 2 metre footways or shared surfaces depending on the location. The proposed internal road network would be formed of low speed and lightly trafficked residential streets with carriageway widths which render them suitable for on-carriageway cycling in accordance with LTN 1/20.

Considering the access location to Footpath 009 is on the bend of Chalfont Road, vehicles will be decelerating and therefore it is estimated that vehicle speeds are below 30mph. As such, pedestrian visibility splays of 43 metres are provided at the crossing point between the site the PRoW.

Earlier, HCC recommended that the detailed design for the proposed pedestrian access be submitted for further review. It was also advised that the applicant consult with the HCC Public Rights of Way (PRoW) officer regarding any proposed improvements.

The Technical Note (TN) provided does not include detailed drawings for the proposed connection to Footpath 009. Furthermore, it will be necessary to submit details for any proposal to connect to Footpath 008.

Car Parking

Table 4.2 of the TA indicates that a total of 168 car parking spaces are provided within the curtilage of the site, of which 20 are provided within garages. The inside of garages will measure a minimum of 6 metres in length and 3 metres wide.

The Highway Authority in its previous response, noted that the proposed car parking provision exceeds the adopted standards and is therefore not considered acceptable. It is recommended that the level of car parking be reduced to align with the requirements set out in the Three Rivers District Council Development Management Policies.

The applicant in the TN notes that the application is in outline form and therefore car parking will be considered in detail later at the reserved matters stage. Table 4.2 of the Transport Assessment accords with the parking standards set out within Three Rivers District's Development Management Policies document (2013). This is considered acceptable. However, the Highway Authority would highlight that the parking provisions for 3 bed units exceeds the standards.

The TA highlights that one active electric vehicle charging point will be proposed to be provided for each dwelling, in accordance with HCC's LTP4, Policy 5. This is considered acceptable.

Cycle Parking

The TA highlights that The Three Rivers District Council's standards require a minimum of 1 long-term cycle parking space per unit if no garage or shed is provided. As such, cycle parking for the proposed houses will be provided in garages and/or garden stores with appropriate access provided. This is considered acceptable.

Refusing and servicing

The applicant has highlighted that the refuse collection will occur from the internal access road within the site. Whilst residents occupying the houses will be required to wheel their bins to the carriageway or designated bin stores on the appropriate bin collect days. In order to ensure the proposed access can facilitate the refuse vehicle manoeuvres without interfering with the free flow of traffic or leading to an adverse effect upon the safety levels of the adjoining highway network, swept path analysis of the indicative site layout has been undertaken.

The Three Rivers District Council's 'Solid Waste Storage/Collection Guidance' (January 2024) states that a 12 metre long by 3 metre wide refuse vehicle should be used to design internal layouts. Swept path analysis included at Appendix H, demonstrates the refuse vehicle entering, navigating and exiting the site.

The TA also highlights that emergency access to the site will be taken from Chalfont Road via the proposed access. The site layout will be designed such that access for a pumping appliance is provided within 45 metres of all points of the dwellings.

Previously, It was noted that on several occasions the swept path analysis indicated overrun onto kerbs and landscaped areas.

The TN resolves the concerns raised previously and is considered acceptable. The drawings 2209054-TK04 and 2209054-TK05 attached to appendix D of the TN demonstrate safe site access from the east. This is considered acceptable.

Growth Factors: (TEMPro)

A 6-year post application (2030) has been assessed and the growth factors derived from TEMPRO.

These factors are considered acceptable and will provide a robust assessment of the local highway network.

Trip Generation

TRICS online database (version 7.7.1) has been interrogated to assess the trip generation potential of the proposed development. The assessment has been carried out based on total vehicle trip rates derived for 'Residential – Houses Privately Owned'

The TA highlights that the proposed development could generate around 40 vehicular movements during each peak hour and around 344 vehicular movements over a typical weekday.

The 'Three Rivers 009' super output area experiences a higher proportion of car driver trips than the average trip rate taken from the TRICS surveyed sites, with 59 two-way movements in the morning peak hour and 49 two-way movements in the evening peak hour.

Trip Distribution

The applicant has submitted traffic flow diagrams as a part of this submission.

Junction Assessment

Previously, HCC raised the following comments:

- The controller spec and signal timing log are not provided to verify the inputs.
- Opposing movements selected to give way and non-blocking storage are incorrectly entered.
- Geometric measurements (including RR67 measurement file for LinSig models) for the modelled junction is not provided in the TA. However, Highway Authority has checked the geometries uses google earth and significant variation are observed on all the arms.
- The flow input in the model currently uses vehicle values. However, it is recommended to use PCU values. This may results in significant variation in outputs realised.
- For Denham Way (N) non signalized approach and Chalfont Rd, significant variation is observed in modelled and observed queue as per Google map traffic data.
- Suitable evidence of validation of the base model is not reported. It is recommended to report the validation of the base model in the TA.
- The capacity assessment shows that in the base, 2024, the junction is operating within the theoretical capacity of the junction during both the morning and evening peak periods. In 2030, with committed development as well with committed and proposed development, both the scenario, the junction operates within the theoretical capacity during both AM and PM peaks. However, it is observed that the junction would experience queues on Denham Way Arms.

The applicant has updated the junction modelling for the Chalfont Road Denham Way (Signalised Junction).

The TN highlights that, during the morning and evening peak periods, the signal junction will work within the theoretical capacity of the junction with a minimal increase in the degree of saturation generated by the development and a minimal increase in the mean max queue along the junction arms. As such, it can be concluded that the proposed development will not have a detrimental impact on the operation of the signalised junction.

Site Access Junction

Geometric measurements for the modelled junction is not provided in the TA. However, Highway Authority has checked the geometries uses google earth and found to be acceptable.

Traffic flow inputs are considered acceptable. At the Chalfont Road / Site Access priority junction, the junction capacity assessment demonstrate that the junction would operate within its design capacity, with minimal delays anticipated. In 2030 future year scenario, the site access would operate at a maximum RFC of 0.1 in the evening peak period.

The Highway Authority has reviewed the submission. Below are the comments:

- *HCC agrees with the use of inputs from the Transport Assessment for application 24/1963/FUL to develop the base model*
- *As per the junction modelling report provided in Appendix E the opposing movements selected to give way for the Chalfont Road and Maple Lodge Close arms have been updated. This coupled with exclusion of non-blocking storage on the Denham Way arms are found acceptable for a robust assessment.*
- *The traffic flow inputs for the signalised junction have been revised to Passenger Car Units (PCUs) to enhance accuracy, and these inputs are deemed acceptable. The modelling output presented in Appendix E indicates that more robust flow data for the 16:00–17:00 peak period has been incorporated into the Origin-Destination (OD) matrix, which is also considered acceptable.*
- *However, the report currently identifies the PM peak hour as 17:00–18:00. Therefore, it is recommended that the applicant update the report to reflect this discrepancy and ensure consistency throughout.*
- *It is understood that the applicant has used the same geometric measurements (RR67 measurement for LinSig model) as Transport Assessment for application 24/1963/FUL. However, the turning radii for Denham Way (N) left turn movements need to be updated.*
- *HCC acknowledge the applicant's reasoning that there could be a possible error in the review of queues observed using Google Maps due to roadworks being in place. It is also noted that the applicant has opted the same base model validation approach as within the 24/1963/FUL application*
- *However, the queue data was not provided in Appendix K of the submitted Transport Assessment or that of 24/1963/FUL application. The applicant is suggested to provide the queue length survey data to cross-check model validation.*

Travel Plan

The Highway Authority provided its commentary against the submitted Framework Travel Plan (FTP) as mentioned below.

- *Interim Travel Plan coordinator contact details are required.*

- Once a TPC is appointed, a secondary contact will also need to be provided.
- Time allocated to the TPC role and details on where they will be based (on-site or off-site) is required.
- Dr Bike or similar should be included to encourage / support cycling.
- Incentives for public transport use should be included (see travel pack contributions comment).
- Residential travel pack contribution is required (£50 per flat, £100 per house) to be redeemed in the form of bus tickets or any public transport offer.
- Monitoring surveys should take place annually.
- Travel plan review must take place annually following data collection and a review report submitted to HCC for review.
- Evidence of incentives should be provided to HCC and uptake should also be measured.

Additionally, it was also highlighted that for inclusion in S106, A full travel plan will be required for the site to be in place from first occupation until 5 years post full occupation. A £1,200 per annum Evaluation and Support Fee should be secured by section 106 agreement in accordance with Hertfordshire County Council's Travel Plan Guidance. This should incorporate measures to promote sustainable transport, an appointed travel plan co-ordinator and an appropriate monitoring programme. Residential developments are also required to provide Residential Travel.

In submitted TN, the applicant has acknowledged the comments received and has suggested that these be addressed through an appropriately worded planning condition.

Construction Traffic Management Plan

Previously, HCC highlighted that a full Construction Traffic Management Plan would be required to ensure construction vehicles would not have a detrimental impact on the highway network.

In submitted TN, the applicant has suggested that this be addressed through an appropriately worded planning condition.

A construction management plan template may be found at:

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx#managementplans>

Community Infrastructure Levy (CIL)

Three Rivers District Council has adopted a Community Infrastructure Levy (CIL). Contributions towards local transport schemes will be sought via CIL if appropriate.

A Section 106 Agreement would be required to secure contributions towards any highway or public transport improvements in the immediate vicinity of the site.

Summary

In summary, HCC as a highway authority wishes to recommend refusal of the planning application, subject to receipt of additional details as identified herein.

1.1.12 Hertfordshire County Council – Highway Authority Second Consultation:

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as

Highway Authority does not wish to restrict the grant of permission subject to the following conditions:

Condition 1: Highway Improvements – Offsite

A) Design Approval

Notwithstanding the details indicated on the submitted drawings, no on-site works above slab level shall commence until a detailed scheme for the off-site highway improvement works as indicated on drawing numbers 2209054-05 & 2209054-01 have been submitted to and approved in writing by the Local Planning Authority in consultation with the Highway Authority. All issues raised within the RSA S1 review must also be resolved, alongside the delivery of highway safety measures along Chalfont Road to support existing and future residents access to PRow RICKMANSWORTH 008 & 009.

B) Implementation / Construction

Prior to the first use of the development hereby permitted, the improvement works referred to in part A of this condition shall be completed in accordance with the approved details.

Reason: To ensure construction of a satisfactory development and that the highway improvement works are designed to an appropriate standard in the interest of highway safety and amenity and in accordance with Policy 5, 13 and 21 of Hertfordshire's Local Transport Plan (adopted 2018).

Condition 2: Travel Plan Statement – Requested Prior to Use

At least 3 months prior to the first occupation / use of the approved development a detailed Travel Plan Statement for the site shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highways Authority. The approved Travel Plan Statement shall be implemented in accordance with the timetable and target contained in therein and shall continue to be implemented as long as any part of the development is occupied subject to approved modifications agreed by the Local Planning Authority in consultation with the Highway Authority as part of the annual review.

Reason: To ensure that sustainable travel options associated with the development are promoted and maximised to be in accordance with Policies 3, 5, 7, 8, 9 and 10 of Hertfordshire's Local Transport Plan (adopted 2018).

Condition 3: Construction Management Plan

No development shall commence until a Construction Management Plan has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan: The Construction Management Plan shall include details of:

- a. Construction vehicle numbers, type, routing;*
- b. Access arrangements to the site;*
- c. Traffic management requirements*
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);*
- e. Siting and details of wheel washing facilities;*
- f. Cleaning of site entrances, site tracks and the adjacent public highway;*
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;*
- h. Provision of sufficient on-site parking prior to commencement of construction activities;*

- i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway;
- j. where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements;
- k. Phasing Plan.

Reason: In order to protect highway safety and the amenity of other users of the public highway and rights of way in accordance with Policies 5, 12, 17 and 22 of Hertfordshire's Local Transport Plan (adopted 2018).

HCC as Highway Authority recommends inclusion of the following Advisory Note (AN) / highway informative to ensure that any works within the highway are carried out in accordance with the provisions of the Highway Act 1980:

AN1) Storage of materials: *The applicant is advised that the storage of materials associated with the construction of this development should be provided within the site on land which is not public highway, and the use of such areas must not interfere with the public highway. If this is not possible, authorisation should be sought from the Highway Authority before construction works commence.*

Further information is available via the County Council website at: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.

AN2) Obstruction of highway: *It is an offence under section 137 of the Highways Act 1980 for any person, without lawful authority or excuse, in any way to wilfully obstruct the free passage along a highway or public right of way. If this development is likely to result in the public highway or public right of way network becoming routinely blocked (fully or partly) the applicant must contact the Highway Authority to obtain their permission and requirements before construction works commence. Further information is available via the County Council website at: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/business-licences/business-licences.aspx> or by telephoning 0300 1234047.*

AN3) Debris and deposits on the highway: *It is an offence under section 148 of the Highways Act 1980 to deposit compost, dung or other material for dressing land, or any rubbish on a made-up carriageway, or any or other debris on a highway to the interruption of any highway user. Section 149 of the same Act gives the Highway Authority powers to remove such material at the expense of the party responsible. Therefore, best practical means shall be taken at all times to ensure that all vehicles leaving the site during construction of the development and use thereafter are in a condition such as not to emit dust or deposit mud, slurry or other debris on the highway. Further information is available by telephoning 0300 1234047.*

AN4) Avoidance of surface water discharge onto the highway: *The applicant is advised that the Highway Authority has powers under section 163 of the Highways Act 1980, to take appropriate steps where deemed necessary (serving notice to the occupier of premises adjoining a highway) to prevent water from the roof or other part of the premises falling upon persons using the highway, or to prevent so far as is reasonably practicable, surface water from the premises flowing on to, or over the footway of the highway.*

AN5) Works within the highway (section 278): The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements. Further information is available via the County Council website at: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx> or by telephoning 0300 1234047.

AN6) Construction Management Plan (CMP): The purpose of the CMP is to help developers minimise construction impacts and relates to all construction activity both on and off site that impacts on the wider environment. It is intended to be a live document whereby different stages will be completed and submitted for application as the development progresses. A completed and signed CMP must address the way in which any impacts associated with the proposed works, and any cumulative impacts of other nearby construction sites will be mitigated and managed. The level of detail required in a CMP will depend on the scale and nature of development.

The CMP would need to include elements of the Construction Logistics and Community Safety (CLOCS) standards as set out in our Construction Management template, a copy of which is available on the County Council's website at: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

Comments / Analysis

The proposed development is for 75 houses on land located to the north-west of Maple Cross. The site is bounded to the south and west by Chalfont Road, to the east by the rear of residential properties along Oakhill Road, and to the north by additional agricultural land. The site is approximately 400m west of Maple Cross Village centre.

A number of comments have been provided by HCC Highways on this application. The most recent comments, dated 26th August 2025, recommended refusal due to a several concerns raised from the Road Safety Audit team relating to the proposed site access and footway as well as a request to provide queue length survey data to ensure that junction modelling of the nearby Chalfont Road/Maple Lodge Close/Denham Way signalised junction is reflective of how the junction operates.

- Further consideration is required regarding the site access with continuous footpath access and visibility splays not clear due to overgrown vegetation and trees that reduce the splays.
- No details have been submitted with regards to the continuous footpath access to the site and Footpath 009. These need to be presented as drawings for review by the county.
- Calculation used for parking provision is incorrect and the proposed number of spaces are higher than the LPAs standards for a residential development.
- Queue length survey data has not been presented in the appendices to the TA, this needs to be provided to validate the traffic models.
- The Applicant has since submitted additional information, which has been reviewed below.

Design Considerations

The access arrangements and offsite works have been subject to a RSA S1, whereby the HCC Road Safety team have provided feedback. The Highway Authority has requested these offsite matters are resolved as part of the S278 and secured by way of planning condition.

Car Parking - Will be reviewed again at the RM Layout submission. Car Parking standards are set by Three Rivers. EV charging must be demonstrated on a drawing and shown to be in line with building regulations.

Cycle Parking - Will be reviewed again at the RM Layout submission. This must be designed in line with LTN1/20 best standards and be located in convenient locations to access.

Refusing and servicing - resolved in previous Highway Authority response dated 26th August. Will be reviewed again at the RM Layout submission.

Trees - Note a CAVAT Figure will be calculated and provided to the planning officer.

Modelling- Queue Lengths

The applicant has submitted the 2025 survey data alongside the revised Highways Technical Note dated 9 October 2025. Detailed comments are provided below:

1. *Peak hour identification:* The Highway Authority have reviewed the 2025 survey data and consider the revised peak hours of 07:45 to 08:45 hours in the AM and 16:30 to 17:30 hours in the PM as acceptable.
2. *Base model:* The Highway Authority are content with the suitability of the base model developed. However, the comment noted in our previous response, relating to the turning radii for the left-turn movement on Denham Way (North) remains unaddressed. We have undertaken some sense checks and note that this is not expected to result in any significant variations to the junction modelling outcomes. As such, we have no further comments to make on the model validation and consider the base model as suitable to be used for the assessments of this development.
3. *Traffic impacts:* The validated 2025 base year scenarios indicate that the junction operates above the threshold capacity (Degree of Saturation (DoS) > 85%), with Chalfont Road operating at 89% during the AM peak hour and Denham Way South operating at 97% during the PM peak hour. The 2030 future year scenarios ('with' and 'without' development) have been run by optimising the signal timings, which slightly improves the operational performance of the junction. The models suggest that the junction will operate close to the threshold capacity, with the following statistics:
 - 2030 AM Peak (Without Development): Highest DoS of 79.7% observed along Chalfont Road, with a Mean Max Queue of 9 PCUs
 - 2030 AM Peak (With Development): Highest DoS of 85.9% observed along Chalfont Road, with a Mean Max Queue of 11 PCUs
 - 2030 PM Peak (Without Development): Highest DoS of 79.8% observed along Denham Way South, with a Mean Max Queue of 18 PCUs
 - 2030 PM Peak (With Development): Highest DoS of 84.9% observed along Denham Way South, with a Mean Max Queue of 20 PCUs

The modelling results show limited variation between the "with development" and "without development" scenarios, indicating that the proposed development is unlikely to cause a severe impact to the operation of the local highway network. It is

noted that the junction currently operates under MOVA (Microprocessor Optimised Vehicle Actuation) system, which dynamically adjusts the signal timings based on real-time traffic conditions. As such, it is expected to further adjust and improve the junction performance by optimising signal timings under future traffic scenarios.

Travel Plan

An updated Travel Plan Statement is requested by way of planning condition, as per HCC Travel Plan Guidance. <https://www.hertfordshire.gov.uk/media-library/documents/highways/development-management/travel-plan-guidance.pdf>

Elements of the submitted Travel Plan that were found to be insufficient in the previous Highway Authority response dated 26th August must be resolved in the updated TP Statement.

Construction Traffic Management Plan

A CTMP has been requested by way of planning condition.

- A construction management plan template may be found at: <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx#managementplans>

Planning Obligations

Under Strand 1 of the HCC Transport Contributions toolkit, £45k is required to deliver bus stop improvements including, but not limited to real time info boards, kessle kerbs, buildouts for the bus stops on Hornhill Road and Chalfont Road. These contributions are essential to ensure future residents and use of all ages and abilities feel safe and confident to wait for bus and to reduce the potential car dominance of the development site, as per NPPF para 117 a/b and HCC LTP Policy 1, 5, 6 & 9.

Conclusion

The Highway Authority have reviewed the additional information and does not wish to raise an objection subject to the inclusion of the recommended planning conditions, informatives and obligations.

1.1.13 Hertfordshire County Council – Highway Authority Third Consultation:

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council as Highway Authority does not wish to restrict the grant of permission subject to the following conditions and obligation set out in the last response dated 24th October and the CAVAT figure detailed below.

Update:

The Highway Authority's previous response dated 24th October 2025 stated a CAVAT Figure will be calculated and provided to the planning officer to be included in the S106.

This has now been derived and is set out below:

- The figure is based on the following trees being removed, all information is contained within the site AIA from the 10th March 2025:
- T20 Elder -G18 - Multiple trees within group av.180mm x 18

- CAVAT value based on reduced functional value and life expectancy: £27,504.00

The Highway Authority note there is mention of 2 additional groups to be removed but there are no further details including reference numbers. The applicant must provide this details now otherwise additional legal agreements will be required prior to the commence of any works on the public highway.

1.1.14 Landscape Officer: No objection

No real objection on tree grounds, a small number will be removed to create access, but there appears to be plenty of scope for new planting. Would it be possible for the pedestrian access to the site to be linked to both Rights of Way, at the moment there's no obvious means of accessing footpath 9.

Is there any scope for S106 for funds to make improvements to our open space across the road, (Beechen Wood and Hornhill Play Area).

1.1.15 Thames Water: Comments received

Waste Comments:

Following initial investigations, Thames Water has identified an inability of the existing SEWAGE TREATMENT WORKS infrastructure to accommodate the needs of this development proposal. As such Thames Water request the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- all sewage works upgrades required to accommodate the additional flows from the development have been completed; or - a development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason – Sewage Treatment Upgrades are likely to be required to accommodate the proposed development. Any upgrade works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

Thames Water would advise that with regard to the FOUL WATER network capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water would advise that with regard to the SURFACE WATER network capacity, we would not have any objection to the above planning application, based on the information provided.

Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network and as such we have no objection, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks.

Thames Water recognises this catchment is subject to high infiltration flows during

certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network and as such we have no objection, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network.

Water Comments:

With regard to water supply, this comes within the area covered by the Affinity Water Company. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

1.1.16 Environmental Health Officer: Verbal comments received

1.1.17 National Grid: No comments received.

1.1.18 Environmental Protection Officer: No response received.

1.1.19 Heritage Officer: No objection

Due to the separation between the Site and the heritage assets, it is unlikely there would be harm from a development in this location.

1.1.20 HCC Growth & Infrastructure Unit: Comments received

I am writing in respect of planning obligations sought towards non-transport services to minimise the impact of development on Hertfordshire County Council Services for the local community. Based on the information to date for the development of 75 dwellings we would seek financial contributions towards the following projects:

HOUSES		
Number of Bedrooms	A) Open Market & Shared Ownership	B) Affordable Rent
1	12	7
2	17	9
3	12	8
4+	7	3
Total	48	27

FLATS		
Number of Bedrooms	A) Open Market & Shared Ownership	B) Affordable Rent
1	0	0
2	0	0
3	0	0
4+	0	0
Total	0	0

Trajectory						
Year	2025	2026	2027	2028	2029	2030
Units	0	0	38	37	0	0

PLEASE NOTE; If the tenure or mix of dwellings changes, please notify us immediately as this may alter the contributions sought.

Primary Education Contribution towards the expansion of Maple Cross JMI and/or delivery of a new primary school to serve the development and/or provision serving the development (£871,854 index linked to BCIS 1Q2024 and BCIS Regional Factor)

Secondary Education Contribution towards the delivery of the new secondary school at Carpenter's Park (subject to the adoption of the Three Rivers Local Plan) and/or provision serving the development (£864,943 (which includes land costs of £17,117) index linked to BCIS 1Q2024 and BCIS Regional Factor)

Special Educational Needs and Disabilities (SEND) Contribution towards new Severe Learning Difficulty (SLD) special school places (WEST) and/or provision serving the development (£146,169 index linked to BCIS 1Q2024 and BCIS Regional Factor)

Waste Service Transfer Station Contribution towards increasing capacity at Waterdale Transfer Station and/or provision serving the development (£7,762 index linked to BCIS 1Q2024)

Monitoring Fees – HCC will charge monitoring fees. These will be based on the number of triggers within each legal agreement with each distinct trigger point attracting a charge of £420 (adjusted for inflation against RPI January 2024). For further information on monitoring fees please see section 5.5 of the Guide to Developer Infrastructure Contributions.

The CIL Regulations discourage the use of formulae to calculate contributions however, the County Council is not able to adopt a CIL charge itself. Accordingly, in areas where a CIL charge has not been introduced to date, planning obligations in their restricted form are the only route to address the impact of a development. In instances where a development is not large enough to require on site provision but is large enough to generate an impact on a particular service, an evidenced mechanism is needed to form the basis of any planning obligation sought. HCC views the calculations and figures set out within the Guide to Developer Infrastructure Contributions as an appropriate methodology for the obligations sought in this instance.

The county council methodology provides the certainty of identified contribution figures based on either a known or estimated dwelling mix, the latter of which might be agreed with the local planning authority based on expected types and tenures set out as part of the local plan evidence base. This ensures the contributions are appropriate to the development and thereby meet the third test of Regulation 122 of the Community Infrastructure Levy Regulations 2010 (amended 2019): "fairly and reasonably relates in scale and kind to the development".

Outline applications will require the ability for an applicant to recalculate contributions at the point of a reserved matters application and as such a calculation Table will be provided as part of the S106 drafting process. This approach provides the certainty of identified contribution figures with the flexibility for an applicant/developer to amend the dwelling mix at a later stage and the financial contribution to be calculated accordingly.

Please note that current service information for the local area may change over time and projects to improve capacity may evolve. This may potentially mean a contribution towards other services could be required at the time any application is received in respect of this site.

Justification

The above figures have been calculated using the amounts and approach set out within the Guide to Developer Infrastructure Contributions Hertfordshire County Council's requirements) document, which was approved by Hertfordshire County

Council's Cabinet 12 July 2021 and is available via the following link: [Planning obligations and developer infrastructure contributions | Hertfordshire County Council](#)

In respect of Regulation 122 of the CIL Regulations 2010 (amended 2019), the planning obligations sought from this proposal are:

(i) Necessary to make the development acceptable in planning terms.

Recognition that contributions should be made to mitigate the impact of development are set out in planning related policy documents. The NPPF states "Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations." Conditions cannot be used cover the payment of financial contributions to mitigate the impact of a development The NPPG states "No payment of money or other consideration can be positively required when granting planning permission."

The development plan background supports the provision of planning contributions. The provision of community facilities is a matter that is relevant to planning. The contributions sought will ensure that additional needs brought on by the development are met.

(ii) Directly related to the development.

The occupiers of new residential developments will have an additional impact upon local services. The financial contributions sought towards the above services are based on the size, type and tenure of the individual dwellings comprising this development following consultation with the Service providers and will only be used towards services and facilities serving the locality of the proposed development and therefore, for the benefit of the development's occupants.

(iii) Fairly and reasonably related in scale and kind to the development.

The above financial contributions have been calculated according to the size, type and tenure of each individual dwelling comprising the proposed development (based on the person yield).

PLEASE NOTE THE FOLLOWING:

Consult the Hertfordshire Fire and Rescue Service Water Officer directly at water@hertfordshire.gov.uk, who may request the provision of fire hydrants through a planning condition.

1.1.21 National Health Service: Comments received

Thank you for consulting the Hertfordshire and West Essex Integrated Care Board (HWE ICB) on the above-mentioned planning application.

Please accept this letter as the HWE ICB's position on primary healthcare capacity and need arising from this planning application and the health financial contribution sought if TRDC is minded to grant planning permission.

The HWE ICB became a statutory body on 1 July 2022 and is the health commissioner responsible for delivering joined up health and social health care to a population of c1.5m. in Hertfordshire and west Essex.

The HWE ICB works in partnership with health providers, local authorities, and other organisations to:

- improve the general health and wellbeing of Hertfordshire and west Essex residents and improve health care services in the area.

- tackle the inequalities which affect people's physical and mental health, such as their ability to get the health services they need, and the quality of those services help tackle health and wider inequalities.
- get the most out of local health and care services and make sure that they are good value for money.
- help the NHS support social and economic development in Hertfordshire and west Essex.

A strategic aim of the NHS HWE ICB is the improvement of primary and community and mental health care outside of a hospital setting. To achieve this the NHS commissions a number of services from general practices in addition to their "core" activity. On the ground this means more joined up care, for example, primary and community healthcare hubs with co-ordinated multidisciplinary professionals/ teams. Therefore, a doctors' general practitioners' surgery may also include an ancillary pharmacy and ancillary facilities for treatments provided by general practitioners, nurses and other healthcare professionals to provide care to residents.

Assessment of impact on existing Healthcare Provision

The HWE ICB has assessed the impact of the proposed development on primary health care provision in and around the vicinity of Borehamwood.

Within the HWE ICB there are 35 Primary Care Networks (PCNs) across the 14 localities; each covering a population of between circa 27,000 and 68,000 patients. These PCNs are expected to deliver services at scale for its registered population whilst working collaboratively with acute, community, voluntary and social care services in order to ensure an integrated approach to patient care. As such a doctors' general practitioners' surgery may include an ancillary pharmacy and ancillary facilities for treatments provided by general practitioners, nurses and other healthcare professionals. The PCN that covers Maple Cross and under which this development falls has a combined patient registration list of 29,997 as of 1 October 2025 which is growing.

Patients are at liberty to choose which GP practice to register with providing they live within the practice boundary. However, most patients choose to register with the surgery closest and/or most easily accessible to their home for the following reasons: it is the quickest journey, accessible by public transport or is in walking distance), parking provision, especially for families with young children and for older adults.

Despite premises constraints GP Practices are not allowed to close their lists to new registrations without consultation with, and permission from the HWE ICB. Even when surgeries are significantly constrained the NHS will seek to avoid a situation where a patient is denied access to their nearest GP surgery, with patient lists only closed in exceptional circumstances.

As a result of significant growth proposed in Local Plans, the HWE ICB expects applications to close lists to increase. It is therefore important that new developments make a financial contribution to mitigate any primary health care impacts the development will have.

The HWE ICB has produced a Primary Care Strategic Delivery Plan, 2023 -2026 which sets out how the HWE ICB wants to develop GP, community pharmacy, dentistry, and ophthalmology services across Hertfordshire and west Essex to benefit patients and communities over the next three years.

The Primary Care Strategic Delivery Plan has three objectives covering:

1. Joined up local teams of health and care.
2. Improved access for urgent same day health.
3. Improved prevention.

These objectives are supported by several key areas of work including the improved use of buildings used to deliver services, developing the primary care workforce, better use of data, information and digital technology and ensuring good value contracts and locally funded projects.

When new dwellings and registrations are planned the preferred option is to find a way to absorb those significant demands upon surgeries for example, by re-configuring, extending or relocating GP premises to provide sufficient space to increase resources and clinical services and thus keep the patient lists open.

Healthcare Needs Arising from the Proposed Development

Development at Land at North of Chalfont Road Chalfont Road Maple Cross will have an impact on primary health care provision in the area, and its implications, if unmitigated, would be unsustainable for the NHS.

This scheme is expected to deliver 75 homes, which will create circa 180 new patients.

These residents will mainly impact on the Rickmansworth and Chorleywood PCN, which is formed of 2 GP practices and has a combined patient list 29,997 as of 1 October 2025.

To illustrate their current capacity, individually as well as collectively - on PCN and settlement level - we have included a small table below:

Surgery Name	Settlement	PCN	Surgery level				Settlement level		PCN level	
			Standalone, Main or Branch	Pt list - 1/10/2025	Patients per m2	Number of patients capacity/constraint relative to 18 per m2	Number of patients capacity/constraint	Total N/A capacity/shortfall	Number of patients capacity/constraint	Total N/A capacity/shortfall
Chorleywood Health Centre	Rickmansworth	Rickmansworth and Chorleywood	Branch	7,456	15.6	1,130	-409	-23	-409	-23
Gade House Surgery		Rickmansworth and Chorleywood	Main Surgery	10,399	32.6	-4,665				
Witton House Surgery		Rickmansworth and Chorleywood	Branch	1,766	7.9	2,282				
The Colne Practice		Rickmansworth and Chorleywood	Standalone	10,377	16.6	844				

This table demonstrates that although there appears to be capacity at Chorleywood HC and the Colne Practice, the PCN collectively is operating close to capacity and their ability to accept additional patients is limited.

Closest surgeries to the proposed development are the Colne Practice and Gade House Surgery. The latter is one of the most constrained practices in Hertfordshire and is ranked 3rd out of 199 surgery premises in the HWE ICB in terms of premises need.

It can therefore be concluded that these practices will be unable to accommodate the additional patient numbers arising from this development, and indeed potential future housing growth in the area, which is set to be significant.

The ICB has been working with the Gade House practice to identify opportunities for expansion and has approved their Project Initiation Document, i.e. given their approval in principle, for a re-location to a purpose-built facility, the exact location of which is yet to be determined.

It should be noted that all NHS health infrastructure improvement projects are subject to the HWE ICB's own governance and scrutiny processes and are assessed against viability, affordability, deliverability and the ability to be future proofed for any future housing growth, given that new medical facilities present a significant cost pressure to the NHS.

Cost calculation of additional primary healthcare services arising from the proposed development

The financial contribution that the HWE ICB is seeking, to mitigate the health impacts from this development has been calculated using a formula based on the number of units proposed and does not take into account any existing deficiencies or shortfalls, or other development proposals in the area.

The proposed development would deliver 75 dwellings, which based on an average occupancy of 2.4 occupants per dwelling will create circa **180 new patient registrations.**

$180 \text{ new patient registrations} / 2000 = 0.09$ of a GP *GP based on ratio of 2,000 patients per 1 GP and 199m² as set out in the NHS England "Premises Principles of Best Practice Part 1 Procurement & Development"

$0.09 \times 199 \text{ m}^2 = 17.91 \text{ m}^2$ of additional space required

$17.91 \text{ m}^2 \times \text{£}7,000^* \text{ per m}^2 = \text{£}125,370$ (*Build cost; includes fit out and fees)

$\text{£}125,370 / 75 = \text{£}1,671.60$ per dwelling (rounded up to £1,672 per dwelling)

Total GMS funds requested: 75x dwellings x £1,672 per dwelling = £125,400 (indexed from the date of the planning permission)

*It should be noted that the NHS England "Premises Principles of Best Practice" is only concerned with the GP core services and does not consider the increasing number of additional services that GP practices are now delivering.

Please note, the developer contribution figure referred to in this response is a calculation only and that the final payment will be based on the actual dwelling unit mix and the inclusion of indexation.

A trigger point of payment on occupancy of the 1st dwelling is requested.

If planning permission is granted, the HWE ICB propose to focus the GMS contribution on Gade House Surgery premises solution.

In respect of Regulation 122 of the CIL Regulations 2010 (amended 2019), the planning obligations sought from this proposal are:

(i) **Necessary to make the development acceptable in planning terms.** The provision of community facilities including health is a material planning consideration. As explained above, a financial contribution has been sought to mitigate the primary health service impacts arising from this development, to enable the Rickmansworth

and Chorleywood PCN practices, especially Gade House Surgery, to continue registering new patients without compromising the quality of service

*(ii) **Directly related to the development.** The new residents of the development will have an additional impact upon local health services. The financial contribution will be used towards the delivery of new, modern primary care facilities in the vicinity of this proposed development. As such the contribution will be used for the benefit of the new residents.*

*(iii) **Fairly and reasonably related in scale and kind to the development.** The above financial contribution has been calculated based on 75 dwellings and 180 new patients to mitigate the primary health service impacts arising from this development.*

Subject to securing the healthcare developer contribution secured, as set out above, to mitigate the health service impacts arising from this development, the HWE ICB does not raise an objection to the proposed development.

1.1.22 East of England Ambulance Service: Comments received

Thank you for consulting the East of England Ambulance Service NHS Trust (EEAST) on the above planning application. This letter sets out the impact of the proposed development on emergency ambulance services and the mitigation required to ensure that EEAST can continue to meet its statutory functions as population grows.

EEAST's request is entirely separate from any contribution sought by Hertfordshire & West Essex Integrated Care System for primary care, community, mental health, or acute services.

Impact of the Development on Ambulance Services

*The proposed 75 dwelling development is expected to generate an additional **180 residents**, based on the local authority average of **2.4 persons per dwelling**. Using EEAST's established and standardised population-based activity model, this population uplift is forecast to generate **41 additional emergency calls per year**.*

*This represents an **13.5% increase in annual activity** arising from this development when compared to current incident levels in the WD195 area (1,185 incidents between 1 April 2024 – 31 March 2025).*

This level of additional activity directly increases:

- *Pressure on the Watford Ambulance Hub, which serves this area*
- *Pressure on regional Emergency Operations Centres receiving and handling 999 calls*
- *Demand for frontline vehicles, vehicle preparation capacity, welfare facilities, and estate infrastructure needed to maintain operational safety and performance.*

Existing Capacity Constraints

Ambulance Hubs must provide sufficient space for vehicles, equipment, welfare areas, and clinical preparation, ensuring rapid deployment and compliance with CQC and national Make Ready standards (Lord Carter Review, 2018).

The Watford Ambulance Hub which would serve the development, currently operates from a constrained estate:

- Existing GIA: 900m²
- Modern Hub requirement: 2,200m²
- GIA Deficit: 1,300m²

Watford Hub provision needs to support approximately 20 Dual-Staffed Ambulances and 4 Rapid Response Vehicles, yet it currently accommodates only 16 vehicles. Increased population growth in the catchment area will further intensify this shortfall.

The proposed development therefore directly and measurably worsens existing capacity pressures, requiring capital investment to maintain safe, resilient, and compliant services.

Legal and Policy Basis for Mitigation

Under Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended), a planning obligation may only be sought where it is:

- Necessary to make the development acceptable in planning terms
- Directly related to the development
- Fairly and reasonably related in scale and kind to the development
- Paragraph 56 of the National Planning Policy Framework (NPPF) confirms the same tests.

The requested contribution meets all three tests.

Table 1 Capital Cost calculation of additional emergency ambulance health services arising from the development proposal

No Dwellings	Infrastructure Cost*	Total
75	£371	£27,818

*calculation of £340 is based on 2.2 persons per dwelling and adjusted pro-rata depending on the expect number of persons per dwelling.

Calculation is based per person using EEAST population (6.1m)/number of incidents in 2024/25 (1.4m) to give a per person incident rate $6.1m/1.4m = 0.23$ incidents per person per annum

EEAST Capital Infrastructure Costs is based on occupancy of 2.2 persons per dwelling, adjusted pro-rata

- Estates build per m2 (£213.50)
- Cost of emergency ambulance vehicles (£126.50)

The capital required to create additional ambulance services to support the population arising from the proposed development is calculated to be **£27,818** and are for the impact of this development only and will be used to support:

- Relocation, expansion/installation of EV charging for the existing Watford Ambulance Hub to meet the increased local demand arising from this housing development.

For clarity, EEAST is seeking capital infrastructure mitigation, not revenue funding. The High Court in R (University Hospitals of Leicester NHS Trust) v Harborough DC [2023] EWHC 263 (Admin) dealt only with requests for revenue funding to address an alleged short term NHS funding lag, and the **judgment expressly states that it does not apply to capital or infrastructure contributions.**

EEAST, like all NHS Trusts, is subject to a strict Capital Departmental Expenditure Limit (CDEL) set by HM Treasury. CDEL restricts annual capital investment and is already fully committed to essential fleet replacement, maintenance backlog, and statutory compliance. Population driven capital expansion is not funded through CDEL, nor through NHS England revenue allocations.

Section 106/CIL funding is therefore the only mechanism available to mitigate the capital infrastructure impacts arising from this development, ensuring that ambulance services can maintain safe operational capacity.

Defibrillators

EEAST would request the Council ensure via a s106 contribution sufficient defibrillators are provided for the new community. This should include the cost of the device, an outdoor rated heated cabinet and the associated consumables, as well as the ongoing maintenance costs for a period of 10-years (circa £10,500 per device). The cabinet needs to be located where there is electrical power and sufficient footfall to provide benefits to the new community. Research indicates 800 meters is the maximum distance to fetch a defibrillator. The s106 could be allocated either to the local parish council or to EEAST.

Comments on Development Proposal

EEAST would request the developer considers the following Health & Wellbeing and Scheme Design Measures as they support physical, mental health and wellbeing and help develop community cohesion:

Health and Wellbeing Scheme Design Measures

EEAST notes the Health Impact Assessment which should consider the impact all health organisations including primary care, acute, mental health, community and emergency ambulance services.

Since the COVID-19 pandemic more people are likely to work from home for at least part of the week, the room size and layout should be sufficient to facilitate at least one person working from home in a suitable environment as this supports both physical and mental health and well-being. Access to fresh air is also recommended.

Developers' inclusion of community gardens, allotments, orchards, meadow flower and woodland planting areas. Balconies, roof gardens and terraces also provide green space opportunities in apartment buildings. Consideration of all senses (sight, hearing, touch, smell, taste) should be addressed by the developer in the planting plan and use of local flora and fauna and wildlife corridor connection.

In central open space developers should establish of seating in open spaces and along walkways to provide the opportunity for residents to meet and supports those who have limited mobility to rest and enjoy the surrounding green space.

Ideally EEAST recommends Passivhaus/BREEAM Excellent standard is used for all housing and where appropriate, commercial buildings. This would also support the council in delivering their sustainability/green plans. As a minimum EEAST recommends the proposed 40% affordable/social housing are built to Passivhaus or BREEAM Excellent standards, as this would provide significantly long-term environmental savings for residents who are more likely to be from the most deprived backgrounds or have limited disposable income.

Flood Assessments

EEAST notes the site is within Flood Zone 1.

Flooding significantly affects residents physical and mental health in both the short and long term. Developers to utilise the catchment of clean/grey water to include underground storage tanks or multiple water butts (ie garage and house) to help reduce the risk of localised flooding post development. There is the potential for residents to reuse water for gardens, car washing and in community gardens instead of entering main sewers.

The use of sustainable urban drainage through permeable paving in driveways and parking areas to accommodate surface water run-off is welcomed and should be suitable for use by wheelchairs, mobility scooters and pushchairs.

Transport, Design and Access

Cycle parking should allow for different types of cycles (e.g. trike, electric bike or mobility scooter) to be stored, covered, secure and well lit.

Blue light emergency services would request developers support the Vision Zero/Safe System approach to design out road accidents for vehicle occupants, motorcyclists, bicyclists and pedestrians by utilising clear lines of sight, use of appropriate street/road lighting, use the of village gateways on approach to the junctions/roundabout and other opportunities to support speed reduction. Clear lines of sight are retained close to properties and walkways to support the reduction and fear of crime whilst also minimising the impact of artificial light.

We hope the Council and developer find the information included in this letter of value.