

PLANNING COMMITTEE – 18 June 2026

PRELIMINARY REPORT

26/0194/OUT: Outline Application: Demolition of existing development and redevelopment of the Site, including the construction of up to 333 dwellings (Use Class C3) of which 50% affordable housing, 66 bed Care Home (Use Class C2), Medical Centre (Use Class E (e)), Local Centre [containing Retail (Use Class E (a-c)), Community Facilities (use Class F2) and Cafe (Use Class E(a))] and associated play space, parking and associated infrastructure. New vehicular access onto Shepherds Lane and pedestrian and cycle accesses onto Shepherds Lane and Berry Lane, bus stop, bike station, landscaping, pedestrian / cycleway access routes, green infrastructure including community amenity space, allotments, play areas, outdoor gym trail / equipment and associated infrastructure including sustainable urban drainage systems (all matters reserved except for access) at Catlips Farm, Berry Lane, Chorleywood

Parish: Chorleywood Parish Council.

Ward: Chorleywood South and Maple Cross

Expiry of Statutory Period: 20 May 2026

Case Officer: Adam Ralton

Extension agreed to: 25 June 2026

Development Type: Major Application

Recommendation:

- (1) That Members agree for officers to arrange a site visit prior to this application being presented to Planning Committee for a decision.
- (2) That the Committee notes the report, and is invited to make general comments with regard to the material planning issues raised by the application.

NOTE: A decision will NOT be made on this application at this time. The application will be returned to a future committee meeting for determination.

Reason for consideration by the Committee: The application has been called in to committee by three Members of the Planning Committee to discuss the potential impact of the proposal on the Green Belt, highways, and sustainability implications, and whether there are any material considerations that outweigh any harm. The Parish Council have also requested the application be called in, for the reasons set out at 9.3 below.

To view all documents forming part of this application please go to the following website:

<https://www3.threerivers.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=TA789AQFJW300>

1 Relevant Planning History

- 1.1 23/2062/EIA: Environmental impact assessment screening request in relation to a proposed development of up to 300 dwellinghouses. EIA not required.
- 1.2 24/1213/EIA: Environmental impact assessment screening request in relation to a proposed development of up to 400 dwellinghouses. EIA not required.

2 Description of Application Site

- 2.1 The application site is an undeveloped greenfield site to the north of Chorleywood. It has an area of approximately 25.9ha and is currently used primarily for grazing of horses, with the fields divided into a series of paddocks. The land includes extensive areas of stables, a

horse walker and other equestrian features, an area used for outdoor storage, and two dwellinghouses.

- 2.2 The topography varies throughout the site. To the southern part, alongside Shepherds Lane, the land generally slopes up away from the M25 and away from Shepherds Lane. The parcel alongside the M25 forms a mound which rises away from the M25 and then falls, forming a bund. The main central area is relatively flat, but with a trend down toward the M25 'mound' and the edge of the woodland. The northeastern parcel generally slopes down toward the Woodland and the north western parcel slopes down fairly steeply toward Berry Lane.
- 2.3 The application site is primarily viewed as grassy paddocks. The various fields are generally divided by hedgerows and trees. Pheasants Wood wraps around the north and east parts of the site. This is generally an area of broad-leaved woodland, and includes an area of ancient woodland to the immediate east of the north-eastern land parcel. The woodland is also identified as a wildlife site. Within and adjacent to the southern boundary of the site are a number of TPO trees, including individually TPO trees along the southern boundary and an area TPO along the first part of the existing entrance drive.
- 2.4 There are no public footpaths within the application site, however there is a public footpath (Chorleywood 030) which runs along the north eastern boundary of the site, from the M25 footbridge, through Pheasants Wood and emerging on Berry Lane close to where the railway is carried over Berry Lane. There is a second public footpath approximately 100m north west of the existing entrance drive, along Shepherds Lane (Chorleywood 029). This leads towards Berry Lane, and links to Chorleywood 028 on the opposite side of Berry Lane which links down to Chorleywood Bottom. There is also a public footpath on the opposite side of Shepherds Lane from the application site (Rickmansworth 066) which runs alongside the M25 toward Heronsgate.
- 2.5 To the south west of the application site is Shepherds Lane, with open agricultural fields beyond. There are also fields beyond the north western boundary, identified as being part of the West Clayton Business Centre. Beyond the south eastern boundary of the site is the M25, with the residential area of Mill End beyond. Beyond the northern boundaries are woodland within Pheasants Wood. The northernmost parcel of land abuts Berry Lane, with a single detached dwelling to the east of that parcel and fields to its west. Berry Lane contains generally detached dwellings set in spacious plots and surroundings.
- 2.6 In terms of land use planning designations, the application site is wholly within the Metropolitan Green Belt. The boundary of the Chorleywood Common Conservation Area runs along the rear gardens of the properties facing the site along Berry Lane, and fronts Berry Lane beyond the west of the site. The conservation area extends north away from the site. As already identified, beyond the north west of the site is the allocated Open Space of Pheasants Wood, part of which is Ancient Woodland and a Wildlife Site. Part of the site (to the south east of the existing buildings) encompasses Pheasants Wood and the Wildlife Site.

3 Description of Proposed Development

- 3.1 This application seeks outline planning permission for the demolition of existing development and redevelopment of the site, including the construction of:
- Up to 333 dwellings (Use Class C3) of which 50% would be affordable housing,
 - 66 bed Care Home (Use Class C2),
 - The planning statement confirms this would cater in particular for older people and/or those with specialist dementia related care needs and would provide 66 single occupancy en-suite bedrooms.
 - Medical Centre (Use Class E (e)),

- Local Centre [containing Retail (Use Class E (a-c)), Community Facilities (use Class F2) and Cafe (Use Class E(a))] and associated play space,
- Parking and associated infrastructure.
- New vehicular access onto Shepherds Lane and pedestrian and cycle accesses onto Shepherds Lane and Berry Lane,
- Bus stop, bike station, landscaping, pedestrian / cycleway access routes,
- Green infrastructure including community amenity space,
- Allotments,
- Play areas, outdoor gym trail / equipment and
- Associated infrastructure including sustainable urban drainage systems.

- 3.2 This application has been submitted in Outline with the matter of Access submitted for approval, and matters of Appearance, Landscaping, Layout and Scale reserved for later consideration. Access is defined in the Development Management Procedure Order as meaning 'the accessibility to and within the site, for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network'.
- 3.3 The main access to the site would be created from Shepherds Lane, approximately 118 metres north-west of the bridge that carries the M25 over Shepherds Lane and approximately 280m south-east of the existing vehicular access that serves Catlips Farm. This would be a vehicular access, with a footway either side to adjoin the internal pavement/footway network. There is an existing footpath running alongside Shepherds Lane from the south east and this would be routed into the application site and widened to 2 metres. The vehicular access would be constructed at a point in Shepherds Lane before the road narrows from a two-lane road down to a single track road.
- 3.4 The existing vehicular access to the site, which is at the single track part of Shepherds Lane, would be retained but amended to provide a pedestrian and cycling route only, with no vehicular access taken to/from this access.
- 3.5 The existing access point from Berry Lane would be retained, and a further access point constructed approximately 80 metres east of this also onto Berry Lane. These would be for cycle and pedestrian use, and not for vehicular access. There is no proposed change to the substation adjacent to the existing Berry Lane access.
- 3.6 The final two access points are to the eastern side of the site, and would connect into two points of public footpath 030 – one would link to the footpath close to the footbridge over the M25, and the second would be adjacent to the communications mast close to the M25.
- 3.7 The application is submitted in outline, with an illustrative layout provided which shows how the site could be developed, with circulation and access roads, walking routes in the form of pavements alongside the roads and separate walking routes around the site.
- 3.8 The application is supported by the following drawings:
- Dwg 2026/331/100 Masterplan
 - Dwg 2026/331/101 Illustrative Contextual Site Plan
 - Dwg 2026/331/102 Illustrative Bird's Eye Wider Contextual Masterplan
 - Dwg 2026/331/103 Illustrative Bird's Eye Contextual Masterplan
 - Dwg 2026/331/104 Topographic Survey
 - Dwg 2026/331/105 Site Location Plan
 - Dwg 5871-001 (Rev H) Access Layout and Visibility Splay
 - Dwg 5871-002 Pedestrian and Cyclist access South Access
 - Dwg 5871-003 Pedestrian and cyclist access and visibility splay north access
 - Dwg 5871-004 Pedestrian access East accesses

3.9 The application is supported by the following documents:

- Agricultural Land Classification Report (Roberts Environmental Ltd, July 2025)
- Air Quality Assessment (Air Dust Odour, January 2026)
- Arboricultural Impact Assessment (GHA Trees, January 2026)
- Archaeological Desk Based Assessment (HCUK Group, February 2026)
- Biodiversity Checklist (signed February 2026)
- Biodiversity Statement and Draft Biodiversity Gain Plan (Luscinia Ecology, February 2026)
- Biodiversity Metric (7 February 2026)
- Covering Letter (Statement Planning, 6 February 2026)
- Design and Access Statement (PFG Design, February 2026)
- Draft Planning Obligation
- Ecological Assessment (Luscinia Ecology, February 2026)
- Energy Statement (Energist, February 2026)
- Flood Risk Assessment and Sustainable Drainage Strategy (Fernbrook, February 2026)
- Framework Travel Plan (Bellamy Roberts, February 2026)
- Green Belt Technical Note (Progress Planning, February 2026)
- Heritage Impact Assessment (HCUK Group, February 2026)
- Illustrative Visuals (PFG Design, February 2026)
- Infiltration Testing (Paddock GeoEngineering, June 2025)
- Landscape and Visual Impact Assessment (CGLA Landscape Architecture, January 2026)
- Letter from Gade and Chorleywood Health Centres (February 2026)
- Letter from LNT Care Developments (January 2026)
- Minerals Resource Assessment (Roberts Environmental Ltd, July 2025)
- Noise Impact Assessment (Sound Planning Ltd, March 2026)
- Pedestrian and Cyclist Environment Review System (Bellamy Roberts, January 2026)
- Phase I Geo-Environmental Risk Assessment (Roberts Environmental Ltd, July 2025)
- Planning Statement including Affordable Housing Statement (Statement Planning, February 2026)
- Statement of Community Involvement (The Community Communications Partnership, January 2026)
- Transport Assessment (Bellamy Roberts, February 2026)
- Verified Views Document (Wizard Visuals)

3.10 During the course of the application the following additional documents were submitted.

- Highways Note – Response to Active Travel England (March 2026)
- Sustainable Drainage Strategy Addendum (March 2026)
- Addendum Highways Note (March 2026)
- Legal Opinion (March 2026)
- Parameter Plan (Drawing 2026/331/106)
- Amended Flood Risk Assessment and Sustainable Drainage Strategy (April 2026)
- Letters from Natural Assets Partners and Woodoaks Farm (both dated 19 March 2026) regarding BNG.
- Heritage Addendum (27 April 2026)
- Amended Schedule of Accommodation, Masterplan, Layout plan
- Amended verified views document
- Addendum to LVIA (May 2026)
- Amendment to Appendix 6 of Transport Assessment (May 2026)
- Enhanced Sustainable Transport Strategy (21 May 2026)
- Amended Air Quality Assessment (19 May 2026)
- Addendum to Heritage Impact Assessment (May 2026)

4 Consultation

4.1 Summary of Consultation Responses:

Active Travel England	Comment received
Affinity Water	Comment received
Chorleywood Parish Council	Object
Environment Agency	No objections
Hertfordshire County Council – Archaeology	No objections
Hertfordshire County Council – Adult Care Services	Comment received
Hertfordshire County Council – Growth and Infrastructure	No objections
Hertfordshire County Council – Highway Authority	Object
Hertfordshire County Council – Lead Local Flood Authority	No objection
Hertfordshire County Council – Minerals and Waste	No objection
Hertfordshire County Council – Water Officer	Comments received
Hertfordshire Constabulary	No comment received
Herts Ecology	More information needed
Historic England	No comment
National Grid	Comment received
National Highways	No objection
NHS Herts and West Essex ICB	Comment received
Thames Water	No objection
Three Rivers District Council - Conservation Officer	More information needed
Three Rivers District Council - Environmental Health	No objections
Three Rivers District Council - Housing Team	No objections
Three Rivers District Council – Landscape Consultant	Comment received
Three Rivers District Council - Leisure Team	Comment received
Three Rivers District Council - Local Plans Team	Comment received
Three Rivers District Council – Tree and Landscape Officer	No comment received
Three Rivers District Council – Urban Design consultant	Comment received
Transport For London	No comment

4.1.1 All consultation responses are provided at Appendix 1 at the end of this report.

4.2 Public/Neighbour Consultation Responses

4.2.1 No. Consulted: 238.

4.2.2 Approximately 170 responses have been received, comprising 150 objections, 4 representations and 16 letters of support.

4.2.3 Site Notice: Seven site notices displayed 24 February 2026 (expired 17 March 2026).

4.2.4 Press Notice: Published 6 March 2026 (expired 27 March 2026).

4.2.5 Summary of letters of support:

- A great opportunity to let new individuals and families enjoy Chorleywood.
- Chorleywood businesses and village centre are in need of more customers to thrive and survive.
- A more culturally diverse population would be welcomed..

- Proposal offers much needed mixture of housing.
- New open areas and parks good for wellbeing and enjoyment.
- Medical centre will help with the strain on existing practices.
- Pleased to see connection to Chorleywood Station.
- Clear need for more affordable housing in the area.
- Proposal appears to enhance infrastructure rather than strain.
- Scheme is sustainably located.

4.2.6 Summary of Representations:

- This development is suitable for the inclusion of swift bricks within the walls of new buildings which provide nest cavities for a number of birds.

4.2.7 Summary of Objections:

IMPACT ON GREEN BELT

- Development would look to join boundaries between Rickmansworth and Chorleywood.
- Inappropriate development in the Green Belt, substantial harm to openness, clear encroachment into the countryside.
- Generic benefits don't outweigh the harm.
- Site is high performing Green Belt.
- Chorleywood would merge with Mill End, this is urban sprawl.

IMPACT ON LANDSCAPE

- Scale and density would urbanise a semi rural edge of Chorleywood.
- Site serves as a critical setting for the Chilterns AONB.
- Natural beauty of the hillside will be lost.
- Proposal would harm the landscape setting of Chorleywood village.

IMPACT ON HERITAGE

- Proposal would impact the views from the conservation area.

IMPACT ON HIGHWAYS, ACCESSIBILITY

- Shepherds Lane cannot cope with the additional cars, it is single track with no footway and limited passing space and visibility.
- Bringing bus onto the site would cause chaos at morning peak.
- Health centre, houses, retail, will all bring more vehicles and deliveries into the site, along Shepherds Lane.
- When M25 has problems, local area comes to a standstill and this will be worse with the additional traffic on Shepherds Lane.
- On-street flooding problems already exist and will be worse
- Road is too dangerous to walk along.
- Access roads including Grove Road, Field Way and Church Lane are already busy, and have parked cars blocking the routes.
- Without guaranteed long term funding, busses cannot run and the development will be fundamentally unsustainable.
- Documents rely on public rights of way but these are steep and unusable in places, including being unlit. The upgrades are mitigation layered onto an inherently car dependent edge of settlement site.
- Previous highways reports have found there will be significant and severe highways safety impacts.
- Surrounding roads are single track roads, limited passing places other than driveways.
- Hertfordshire County Council have offered children taxis to get to and from school because Berry Lane is not safe to walk on.

IMPACT ON INFRASTRUCTURE

- Schools, healthcare, drainage and transport are already under pressure.

- Inclusion of NHS facility does not guarantee NHS commissioning or staff. It is a speculative benefit.
- Drainage and sewerage already at capacity so cannot cope.
- Trains are already at capacity.

IMPACT ON ENVIRONMENT, ECOLOGY, BIODIVERSITY

- Proposal risks habitat loss and fragmentation.
- Proposal would destroy green areas.
- Loss of wildlife and impact on ancient woodland

OTHER

- Development would be next to the busiest motorway in Europe with high pollution.
- Overdevelopment in Rickmansworth is going to destroy the town.
- M25 acts as a major physical barrier, proposal is an isolated car dependent urban island over 20 minutes walk from the station and village core.
- Would permanently displace agricultural and equestrian land, eroding rural land use.
- Affordable housing is not genuinely affordable.
- Chorleywood's population would significantly increase, it would lose its village feel and become a town.
- Concern over construction activities.
- Concerns regarding dumping of asbestos on the site.
- Will result in a loss of Best and Most Versatile agricultural land.
- Mill End has limited shops, schools and medical facilities, all under strain.
- Proposal conflicts with neighbourhood plan.

4.2.8 Responses were also received from the following local organisations/groups:

4.2.8.1 Campaign to Protect Rural England Hertfordshire (Objects)

I write with regard to the above planning application to which CPRE Hertfordshire objects for the following reasons.

1. The land identified for this proposed development is designated as London Metropolitan Green Belt in the adopted Three Rivers Core strategy where development is stated as being inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy Framework (NPPF).
2. The Applicant's planning consultants note the 2024 revision of the NPPF and the introduction of the concept of grey belt as a significant justification for the submission of this application. They also state that, in the event of grey belt not being established, very special circumstances can be identified to clearly outweigh the harm caused to the Green Belt in this location.
3. The site is included in the emerging Draft Local Plan Regulation 18 document which was published for further public consultation in July 2025. It is not appropriate in our view for such a significant allocation in the Green Belt to be determined outside the Local Plan process which has been seriously affected by the unprecedented issuing of a Holding Direction by the Secretary of State in February 2026 with regard to further progress of Local Plan preparation.
4. The Secretary of State's intervention has been accompanied by a public statement that the emerging Local Plan is highly likely to be found unsound, in advance of any Examination in Public. We have profound concerns about the appropriateness of such a procedure which may amount to effective pre-determination of any subsequent planning applications.
5. This concern is much heightened by the recent recovery by the Secretary of State of the planning application (reference 25/1020/OUT) for Oxhey Lane, Carpenders Park which is a similar proposed development of 256 units in Three Rivers in the Green Belt. CPRE Hertfordshire believes that consideration of matters regarding housing land supply, and specific applications should be dealt with in a coordinated manner through

the Local Plan preparation, particularly where land is constrained by statutory protection.

6. Very significant local community opposition continues to development in the Green Belt. The proposed development would clearly constitute a breach of the first, second and third purposes of the Green Belt as identified in the NPPF (paragraph 143) to prevent urban sprawl, the coalescing of settlements and encroachment onto open countryside.
7. We entirely refute the assertion that the first purpose of the Green Belt has no relevance in this case and that this site constitutes grey belt under the present legal definitions. In the case of the London Metropolitan Green Belt, the first purpose of the Green Belt refers as much to the effect of the urban sprawl emanating from the growth of the capital as the major development generator in this and the surrounding areas, as to the sprawl of other major settlements.
8. The proposed development is clearly urban sprawl beyond the built-up area of the adjoining settlement of Chorleywood which the Green Belt legislation was designed to prevent. Arguments relating to the inconsequential impact of each individual application on the Green Belt as a whole become seriously inappropriate when the cumulative effect of several applications is considered, as is occurring in Hertfordshire. Accordingly, CPRE Hertfordshire believes that the first reason for the Green Belt as identified in NPPF paragraph 143 applies in this case.
9. Further, the proposed development will make a major contribution to the coalescence of the settlements of Chorleywood and Rickmansworth thus affecting the second purpose of the Green Belt. Together with purpose c) regarding encroachment onto the countryside, they provide the “strong reason” required to refuse development as noted in the NPPF footnote 7. Recent planning inquiry, and increasingly Council planning decisions permitting development are demonstrating the hugely damaging impact of the present definition of grey belt on open countryside.
10. It is noteworthy that virtually every major planning application for residential and commercial development within the Green Belt in Hertfordshire made since 12th December 2024 has identified the site as grey belt, notwithstanding the quality and character of the landscape or local conditions in each case. This is clearly an unsustainable position and it is becoming increasingly clear that the existing definitions and guidance on grey belt are entirely inadequate to prevent the wholesale removal of highly valued and significant Green Belt protections.
11. CPRE Hertfordshire will continue to campaign vigorously for changes in national planning policy and PPG to redress the imbalances that now exist in assessing the impact of the merging of Green Belt settlements, regardless of the settlement size. Unrestricted development around villages adjacent to and between towns could ultimately lead to the coalescence of larger settlements.
12. Remaining issues quoted in the Planning Statement regarding very special circumstances constitute obligations which would accrue to any proposed development of this size and function. The now standard practice in major planning applications in the Hertfordshire Green Belt of listing such benefits, including public services and facilities and the like reduces the consideration of such issues to a check-list of items irrespective of the conditions and circumstances of the location and inevitably renders them as less “special”.
13. As significant as the proposed benefits is the growing paucity of open space adjacent to built-up areas with its attendant physical and mental health benefits. The Green Belt in this area is under unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings, and its continual reduction is in danger of bringing the planning system into disrepute.
14. The existence of legally binding agreements between appropriate institutions involved in the provision of truly affordable low cost housing should be required in this case. Given the inadequacy of the official definition to reflect the true state of the housing market in Hertfordshire, affordability for average earning households is generally unattainable in the County.
15. We note the intention to provide 50% affordable housing but this is essentially meaningless without further information and commitments to its provision. There is

significant experience in Hertfordshire and elsewhere of initial commitments to affordable housing not being maintained, generally quoting viability issues and at the very least the Council should seek robust guarantees regarding affordable housing proposals.

16. In summary, it is undeniable that the planning policy context created by the 2024 revised NPPF has provoked a disturbingly high number of new applications and reapplications for sites which were previously refused permission. Whereas a proportion of such applications may warrant consideration for various reasons, the illogicality of the revised NPPF supporting five purposes of the Green Belt (para 143) and then only permitting three purposes to be considered in applications (NPPF Glossary definition) is unsupportable in this case.
17. South-west Hertfordshire is under unrelenting pressure for development and the value of the open countryside that remains increases for local communities and visitors, notwithstanding wider environmental benefits relating to the amelioration of the effects of climate change, maintenance and enhancement of biodiversity, and physical and mental health.

We urge the Council to refuse permission for this inappropriate speculative development.

4.2.8.2 The Woodland Trust (Objects):

Please find the Woodland Trust's comments on this application below. Our comments are based on a review of the information provided in the planning application. We are an evidence-led organisation, using our policy and planning expertise to assess impacts of development on ancient woodland and veteran trees.

Woodland Trust position

The Trust objects to this application on the basis of deterioration of Pheasant's Wood (grid ref: TQ 02652 94963), designated as an Ancient Semi Natural Woodland on Natural England's Revised Ancient Woodland Inventory (AWI).

We are concerned that the applicant has not used Natural England's Revised AWI which provided updated information on the location of ancient woodland in Hertfordshire earlier this year. The Revised AWI significantly extends the area of Pheasant's Wood designated as ancient such that it now also includes the larger parcel of woodland to the south.

In order for the impact on ancient woodland to be fully assessed and understood the applicant needs to provide the following information: -

- Clear plans showing the boundaries of the ancient woodland adjacent to the site
- Measurements showing width of buffer zones in relation to key infrastructure
- Clear indication of where access into buffer zones will be encouraged or deterred
- Clarity on the proposals for the two new pedestrian access points within ancient woodland at grid ref: TQ 03795 95096 and grid ref: TQ 03852 95308
- Details of any other work proposed within ancient woodland or within buffer zones
- Assessment of impacts arising from: -
 - o intensified activity within and adjacent to ancient woodland
 - o habitat fragmentation and reduction in landscape connectivity
 - o noise pollution and emissions from increases in traffic
 - o changes to surface or groundwater flows (e.g. from hardstanding/SUDs)
- Details of any veteran trees within or adjacent to the site, assessment of impacts and mitigation proposals

In its current form the proposals in relation to ancient woodland are not clear, and there is no accompanying assessment of impact. As such it has not been demonstrated that it will in principle be feasible to mitigate impacts on the ancient woodlands.

Therefore, it has not been demonstrated that the application is consistent with National Planning Policy Framework para 193 (c) and reflects Natural England and Forestry Commission's standing advice¹ (see Annex A for details).

Ancient Woodland

Ancient woodland is an irreplaceable habitat of great importance for its wildlife, soils, recreational and cultural value, historical and archaeological significance, and the contribution it makes to our diverse landscapes. It is a scarce and threatened resource, covering only 2.5% of England's land area. It has a high level of protection in planning policy.

Ancient woodland is defined in the standing advice as follows: -

"Ancient woodland takes hundreds of years to establish and is defined as an irreplaceable habitat. It is a valuable natural asset important for: wildlife (which include rare and threatened species); soils; carbon capture and storage; contributing to the seed bank and genetic diversity; recreation, health and wellbeing; cultural, historical and landscape value. It has been wooded continuously since at least 1600AD. It includes: -

- Ancient semi-natural woodland [ASNW] - mainly made up of trees and shrubs native to the site, usually arising from natural regeneration.
- Plantations on ancient woodland sites [PAWS] - replanted with conifer or broadleaved trees that retain ancient woodland features, such as undisturbed soil, ground flora and fungi"

Government's policy statement on ancient woodland, 'Keepers of Time: ancient and native woodland and trees policy in England' states: "Ancient woodlands, ancient wood pastures and parkland and ancient and veteran trees are irreplaceable habitats which must be protected. Their long-standing presence, species and form serve as a rich cultural record of past management practices".

Planning Policy

The National Planning Policy Framework, paragraph 193, states: "When determining planning applications, local planning authorities should apply the following principles:

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons⁷⁰ and a suitable compensation strategy exists;"

Footnote 70 defines exceptional reasons as follows: "For example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat."

There is no wholly exceptional reason for the development in this location and as such in its current form this application does not comply with national planning policy.

Conclusion

The Trust objects to this planning application due to loss and deterioration of ancient woodland.

The applicant needs to provide clear plans showing the proposed works in relation to ancient woodland, as shown on the Revised Ancient Woodland Inventory, together with an assessment to demonstrate the feasibility of mitigating impacts in the context of the current design parameters.

The application should be considered for refusal unless the applicant is able to provide clear and robust assessment to demonstrate that loss and deterioration can be avoided.

- 5.1 The application has been extended beyond its original statutory determination period in order to enable the applicant to work with those consultees who have raised technical objections, to address their objections as far as they are able.

6 Relevant Planning Policy, Guidance and Legislation

6.1 Legislation

Planning applications are required to be determined in accordance with the statutory development plan unless material considerations indicate otherwise as set out within S38(6) Planning and Compulsory Purchase Act 2004 and S70 of Town and Country Planning Act 1990.

S72 of Planning (Listed Buildings and Conservation Areas) Act 1990 requires LPAs to have special regard to the desirability of preserving or enhancing the character or appearance of conservation areas.

Countryside and Rights of Way Act 2000

The Localism Act received Royal Assent on 15 November 2011. The Growth and Infrastructure Act achieved Royal Assent on 25 April 2013.

The Wildlife and Countryside Act 1981 (as amended), the Conservation of Habitats and Species Regulations 2017, the Natural Environment and Rural Communities Act 2006 and the Habitat Regulations 1994 may also be relevant.

The Environment Act 2021

6.2 National Planning Policy Framework and National Planning Practice Guidance

In December 2024 the National Planning Policy Framework (NPPF) was updated and may be read along with the National Planning Practice Guidance (NPPG) as relevant government planning guidance. As is recognised in the NPPF, planning law requires that applications for planning permission be determined in accordance with the development plan unless material considerations indicate otherwise. The NPPF and NPPG are ‘material considerations’ relevant to planning decision making. The NPPF is equally clear that “existing [development plan] policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework” (NPPF Annex 1: 232).

A number of NPPF chapters are relevant to the consideration of this application, with the most important being:

- 2 – Achieving sustainable development
- 5 – Delivering a sufficient supply of homes
- 6 – Building a strong, competitive economy
- 8 – Promoting healthy and safe communities
- 9 – Promoting sustainable transport
- 12 – Achieving well-designed places
- 13 – Protecting Green Belt land
- 14 – Meeting the challenge of climate change, flooding and coastal change
- 15 – Conserving and enhancing the natural environment
- 16 – Conserving and enhancing the historic environment

6.3 The Three Rivers Local Development Plan

The planning merits of the application have been assessed against the policies of the development plan, namely, the Local Plan, including the Core Strategy (adopted October

2011), the Development Management Policies Local Development Document (adopted July 2013), the Site Allocations Local Development Document (adopted November 2014) and the Chorleywood Neighbourhood Plan (adopted 2021) as well as government guidance. The policies of Three Rivers District Council reflect the content of the NPPF.

The Core Strategy was adopted on 17 October 2011 having been through a full public participation process and Examination in Public. Relevant policies include Policies PSP2 (Development in Key Centres), CP1 (Overarching Policy on Sustainable Development), CP2 (Housing Supply), CP3 (Housing Mix and Density), CP4 (Affordable Housing), CP6 (Employment and Economic Development), CP8 (Infrastructure and Planning Obligations), CP9 (Green Infrastructure), CP10 (Transport and Travel), CP11 (Green Belt) and CP12 (Design of Development).

The Development Management Policies Local Development Document (DMLDD) was adopted on 26 July 2013 after the Inspector concluded that it was sound following Examination in Public which took place in March 2013. Relevant policies include DM1 (Residential Design and Layout), DM2 (Green Belt), DM3 (Historic Built Environment), DM4 (Carbon Dioxide Emissions and On Site Renewable Energy), DM6 (Biodiversity, Trees, Woodland and Landscaping), DM7 (Landscape Character), DM8 (Flood Risk and Water Resources), DM9 (Contamination and Pollution), DM10 (Waste Management), DM11 (Open Space, Sport and Recreation Facilities and Children's Play Space), DM12 (Community, Leisure and Cultural Facilities), DM13 (Parking), Appendix 2 (Design Criteria), Appendix 4 (Noise exposure categories for residential development) and Appendix 5 (Parking Standards).

Chorleywood Neighbourhood Development Plan (Referendum Version, August 2020, adopted May 2021). The following policies are relevant to the current proposal: 1, 2, 3, 4, 5, 9, 10, 11, 12, 13, 15.

Hertfordshire County Council's adopted Minerals Local Plan 2002 – 2016.

The Waste Core Strategy and Development Management Policies 2011–2026

The Waste Site Allocations Development Plan Document 2011–2026

6.4 Other

Chorleywood Common Conservation Area Appraisal (2010)

The Community Infrastructure Levy (CIL) Charging Schedule (adopted February 2015).

Three Rivers District Council Housing Delivery Test Action Plan (June 2024)

Three Rivers District Council Housing Land Supply Update (April 2026)

Stage 1 Green Belt Review – Strategic Analysis (2017).

Stage 2 Green Belt Assessment for Three Rivers and Watford Borough (2019).

Stage 4 Green Belt Review (2025)

South-West Herts Local Housing Needs Assessment Update (March 2024).

7 **Planning Analysis**

7.1 Principle of Development – Settlement Hierarchy

- 7.1.1 The Core Strategy sets out the long term spatial vision for Three Rivers, and the strategic policy objectives required to deliver the vision. The Spatial Vision includes priorities to provide growth required to support local communities and provide for their needs in the most sustainable way possible, to locate growth in the most sustainable locations, to improve access to housing and affordable housing and to promote sustainable transport options.
- 7.1.2 The Spatial Strategy looks to focus development within the existing urban area through the development of previously developed land and appropriate infilling within the urban areas of the Principle Town and Key Centres. In this case the application site falls between two areas identified by the Core Strategy as being 'Key Centres' – between the Key Centres of Mill End (to the south-east) and Chorleywood (to the north west). The application site abuts the boundary of the Chorleywood Key Centre, and is separated from the Mill End Key Centre by the M25 motorway.
- 7.1.3 Policy PSP2 in the Core Strategy relates to development in key centres and confirms that Development in Key Centres will focus future development predominantly on sites within the urban area, on previously developed land, contribute to an integrated approach to improve transport including public transport, and provide improved access to healthcare services in Mill End.
- 7.1.4 It is acknowledged that the development subject of this application would provide housing including affordable housing, proposes public transport improvements, provides a new healthcare facility and provides publicly accessible open space and links to the existing footpath network. However, these are delivered in the context of a site which falls outside the Key Centre or any area identified as having development directed toward it within the Spatial Strategy. Therefore, the development of this site would conflict with the Spatial Strategy and PSP2 within the Core Strategy.
- 7.2 Principle of Development – Impact on the Green Belt
- 7.2.1 The application site is located within the Metropolitan Green Belt. Core Strategy Policy CP11 sets out that the Council will maintain the general extent of the Green Belt in the District and will encourage appropriate positive use of the Green Belt and measures to improve environmental quality. There will be a 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.
- 7.2.2 Development Management Policy DM2 notes that “as set out in the NPPF, the construction of new buildings in the Green Belt is inappropriate with certain exceptions, some of which are set out below”. Relevant to this current application is a) New Buildings, which states “Within the Green Belt, except in very special circumstances, approval will not be given for new buildings other than those specified in national policy and other relevant guidance”. Policy DM2 was adopted prior to the publication of the current NPPF. However, it was adopted after the publication of the original 2012 NPPF, and the Green Belt policies in the NPPF, in terms of the exceptions at NPPF154 are not materially different between the two. On that basis, it is considered that Policy DM2 is in accordance with the NPPF and may be afforded full weight. The NPPF is considered to contain national policy and therefore relevant guidance and a relevant material consideration.
- 7.2.3 The NPPF at para 142 states “the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence”. Para 143 states that Green Belt serves five purposes:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;

- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 7.2.4 Para 145 states that “Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. This application does not seek to alter Green Belt boundaries. It proposes development within the Metropolitan Green Belt.
- 7.2.5 Para 151 states that “Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation...”
- 7.2.6 Paragraph 153 states that *“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt, including harm to its openness⁵⁵. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘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”*.

NPPF Para 154 Considerations

- 7.2.7 Para 154 states “Development in the Green Belt is inappropriate unless one of the following exceptions applies:
- 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) 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);
 - g) limited infilling or the partial or complete redevelopment of previously developed land (including a material change of use to residential or mixed used 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 that 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, of for cemeteries and burial grounds; and
 - vi) development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.”
- 7.2.8 In respect of paragraph 154, the proposed development does not fall into any of categories a, c, d, or f.

- 7.2.9 The proposal does include land for allotments, and these are indicated on the illustrative masterplan. The site includes a number of parcels of open space and the allotments form one small part of this. Having regard to 154(b) there are no specific concerns in respect of the provision of allotments which may in isolation preserve the openness of the Green Belt and not conflict with the purposes of including land within it. However, the allotments form part of the wider development and must be viewed in this context.
- 7.2.10 In respect of e, the application is not considered to represent 'limited infilling' and is not located within a village, and as such the development would not comply with this exception. Similarly, only a very small part of the site would be previously developed land and the proposal would not comply with exception g on that basis.
- 7.2.11 As regards to categories h(ii) and h(v), whilst the proposed development involves considerable engineering operations and a material change of use, these are primarily associated with and contingent upon the construction of buildings and roads to form the development and not to be undertaken for any other purpose. In any event, the resultant land levels, and built form consequent upon the engineering works on the site, and the use would not preserve openness and would conflict with the purposes of including land within the Green Belt.

NPPF Para 155 Considerations

- 7.2.12 Whilst the development would not be in accordance with Paragraph 154 of the NPPF it is also necessary to consider the development in relation to Paragraph 155 of the NPPF. This sets out 'that the development of homes, commercial and other development in the Green Belt should not be regarded as inappropriate where all of 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 demonstrable unmet need for the type of the development proposed.
 - c) The development would be in a sustainable location with particular reference to paragraphs 110 and 115 of this framework.
 - d) Where applicable the development meets the 'Golden Rules' requirements set out in paragraphs 156-157.

Grey Belt Analysis

- 7.2.13 In considering whether the site would constitute Grey Belt land, reference must be had to Annexe 2 of the NPPF which defines Grey Belt as follows:

For the purposes of plan- making and decision making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case does not strongly contribute to any of purposes (a), (b) or (d) in paragraph 143. Grey Belt excludes land where the application of the policies relating to the areas of assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development'.

- 7.2.14 In this case, the site is primarily 'any other land', as it is not 'previously developed land'. For it to be considered Grey Belt land, the land needs to not strongly contribute to any of the purposes (a), (b) or (d) of Paragraph 143 of the NPPF. These purposes are:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another; and*
- d) to preserve the setting and special character of historic towns.*

- 7.2.15 In considering whether the application site contributes to the purposes (a), (b) or (d) regard must be had to Planning Practice Guidance (PPG) at Paragraph 005 Reference ID: 64-005-2025022 which provides guidance in relation to informing judgements as to whether land

can be considered as Grey Belt. In addition, Paragraph 007 of the PPG is also relevant and sets out the following:

After consideration of the above criteria, any assessment area that is not judged to strongly contribute to any one of purposes a, b, or d can be identified as grey belt land, subject to the exclusion of land where the application of the policies relating to the areas or assets in footnote 7 to the NPPF (other than Green Belt) would provide a strong reason for refusing or restricting development.

- 7.2.16 In considering the contribution sites make to purposes a) and b), Planning Practice Guidance is clear that these purposes relate to the 'sprawl of large built up areas. Villages should not be considered large built up areas' and '...merging of towns, not villages'. It therefore becomes necessary to consider whether, for the purpose of this assessment, Chorleywood is a Village as this will influence the consideration against purposes a) and b) above.
- 7.2.17 The application is accompanied by a 'Green Belt Technical Note' which sets out that the site qualifies as Grey Belt. The note (4.13) sets out that Chorleywood is 'not a town both with regards to its function, previous classification and/or character'. From 6.5, the note identifies that the site is on the edge of the village of Chorleywood and that Chorleywood is not a large built up area.
- 7.2.18 The note sets out that other appeal decisions confirm that the classification of a settlement as a town or village is a matter of planning judgement, informed by its scale, range of services and facilities, physical form and findings from previous appeal decisions and plan making evidence. It also confirms that adopted development plan definitions carry the greatest weight in determining a settlement's classification, therefore relying on the Local Plan Proposal's map. It also sets out how the Neighbourhood Plan references Chorleywood as a village. The note concludes that Chorleywood should be regarded as a village rather than a large built up area, and that Rickmansworth is a neighbouring town. It draws comparisons with Abbots Langley, which shares a designation as Key Centre but has previously been identified as a village in appeal decisions (2017). The review (6.14) sets out that only Rickmansworth can be considered a Large Built Up Area and the site is not adjacent to nor directly connected with Rickmansworth, being over 250m from the defined settlement boundary.
- 7.2.19 The application is also accompanied by a Legal Opinion, which confirms that the application has been made on the basis that Rickmansworth is a town and a large built up area, with the site being between Chorleywood and Rickmansworth. The Opinion sets out that it would be difficult to defend the site making a strong contribution to purpose a) in relation to Rickmansworth because whilst near to Rickmansworth, the site is separated from Rickmansworth by the M25 which is a physical feature that could contain development. The Opinion also confirms there is no guidance to decide whether a settlement is a village, but sets out specific matters that it is considered confirm that Chorleywood is a village.
- 7.2.20 In the context of the Development Plan (Core Strategy), Chorleywood is recognised as a 'Key Centre'. Only two settlements are identified as Villages: Bedmond and Sarratt. The Chorleywood Neighbourhood Plan introduction explains that "*Throughout this document we refer interchangeably to the Parish area of Chorleywood as "the Parish", "the Village" or "Chorleywood", and Chorleywood Parish Council as "the Parish Council". The different terms are used depending on the context*". It is considered that the Core Strategy does not define Chorleywood as a Village, and that the Neighbourhood Plan which was published before the definition of Grey Belt was published, uses the term Village interchangeably with other terms and is not determinative as to the status of Chorleywood as being, or not being, a village.
- 7.2.21 In the context of the emerging Local Plan, the Settlement Hierarchy identifies Chorleywood as being a 'Small Town/Large Suburban Settlement'. The Settlement Appraisal confirms 'it

is the largest settlement by area' with services concentrated toward the west, with the eastern part of the settlement reliant on Rickmansworth for services.

7.2.22 The council commissioned a Stage 1 Green Belt review which was completed in 2017 and assessed the whole of the Green Belt in terms of its contribution to the five purposes. Table 2 includes Chorleywood and Rickmansworth as 'large built up areas' for the purposes of Green Belt purpose a). The application site is within land parcel SW9 (as illustrated at Appendix 2), described as having a strong connection to the wider open countryside to the south. The review notes that there are contiguous areas of Green Belt which maintain separation of the towns, with the land between Rickmansworth and Chorleywood more locally assuming significance in this role. It is acknowledged that the review does later refer to Chorleywood as a 'large village'.

7.2.23 The council commissioned a Stage 2 Green Belt review, completed in October 2019, to consider the effect of the release of different areas affects the Green Belt purposes. The application site is within land parcel CH3 (as illustrated at Appendix 2), and occupies less than half of that parcel. The review notes that "Chorleywood is close enough to more contiguous urban development to the east to be considered to constitute part of the large built up area extending out from Greater London". It notes Chorleywood is not considered to be a town but that the open space around it contributes to the overall gap between the towns of Rickmansworth and Little Chalfont.

GB Purpose	Stage 1 Review (Parcel SW9)	Stage 2 review (Parcel CH3)	Stage 4 Review
A to check the unrestricted sprawl of large built-up areas	Contribution (contains Chorleywood)	Significant contribution	Release would be considered significant sprawl of the large built up area. Presence of M25 on eastern boundary prevents sprawl in that direction.
B to prevent neighbouring towns merging into one another	Significant contribution (part of open land between Rickmansworth and Chorleywood)	Relatively significant	Contribution, preventing neighbouring towns of Rickmansworth and Chorleywood from merging.
C to assist in safeguarding the countryside from encroachment	Significant contribution (Maintains openness of land vulnerable to change)	Significant	Significant impact
D to preserve the setting and special character of historic towns	Contribution (to northerly setting of the conservation area)		Limited
E to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	Limited		Limited
Overall contribution to GB purposes	Significant	Moderate-High	

7.2.24 The Stage 4 Green Belt review confirms how the Stage 2 review defined areas, stating "In terms of defining the large built-up areas, the Stage 2 GBR remained consistent with the Stage 1 GBR – identifying Rickmansworth, Chorleywood, Northwood, Croxley Green,

Watford, Hemel Hempstead and Bushey. However, it also expanded the list of areas considered, noting ‘some settlements such as Loudwater, South Oxhey etc.. that are close enough to more contiguous urban development within the settlements outlined above to constitute part of the large built-up area extending out from Greater London.’ Table 3 of the same report confirms the assumption that Chorleywood is a large built up area/town. Table 4 confirms that using ONS settlement classifications, Chorleywood is a large village/small town but the supporting text does suggest there is some ambiguity.

7.2.25 Chorleywood contains a considerable range of facilities, including various shops, offices, healthcare services, bus stops, railway stations, multiple schools, cafes and restaurants. When compared to Sarratt and Bedmond, two settlements defined as Villages in the current Core Strategy, it is considerably larger, better connected to other areas, has a wider range of shops and facilities, and a larger population. It is acknowledged that there are two ‘parts’ to Chorleywood. The first is the central area around Lower Road and the station, and the two conservation areas. Separated by the Common is the second part, generally comprising residential dwellings which are contiguous with the settlement of Rickmansworth, and adjacent Mill End. Were it not for these administrative boundaries, there would be no perceivable difference between being in Rickmansworth, and being in Chorleywood when travelling, for example, along Chorleywood Road or Berry Lane. On the basis of the above, for the purposes of this assessment and having regard to the scale of the area, the amenities and services it contains, and its relationship with its surroundings it is not considered that Chorleywood is a village.

7.2.26 a) to check the unrestricted sprawl of large built-up areas: Planning Practice Guidance sets out illustrative features that may suggest whether a site makes a strong, moderate or weak contribution to this purpose. The text is included in the table below, and includes officer’s consideration.

Contribution	Illustrative Features	Officer Commentary
Strong	Assessment areas that contribute strongly are likely to be free of existing development, and lack physical feature(s) in reasonable proximity that could restrict and contain development. They are also likely to include all of the following features: - be adjacent or near to a large built up area	Site contains very limited existing development. The site is separated from the larger built up area of Mill End/Rickmansworth by the M25. The M25 acts as a clear physical barrier to that large built up area. The proposal would appear to be a sprawl of this built up area beyond the M25 toward Chorleywood. The M25 would stop sprawl from the site to the east (as would the lack of space beyond the M25 to build on) and existing woodland would stop sprawl to the north. Shepherds Lane would stop further sprawl to the south. There is no physical feature restricting/containing development to the east – just hedgerows comparable to those proposed to be removed from within the application site as part of the development. The site/area is adjacent to a large built up area (Rickmansworth, formed by the wider and interconnected areas

Contribution	Illustrative Features	Officer Commentary
	- if developed, result in an incongruous pattern of development (such as an extended “finger” of development into the Green Belt)	of Mill End, Rickmansworth and Chorleywood) Development would appear incongruous, being development on the western side of the M25 where the immediate area to the west of the M25 is open and undeveloped. It would appear as a finger of development, extending the settlement of Rickmansworth to the east into the Green Belt. The site including main community facilities would be accessed from the Rickmansworth direction and relate to Rickmansworth.
Moderate	Assessment areas that contribute moderately are likely to be adjacent or near to a large built up area, but include one or more features that weaken the land’s contribution to this purpose a, such as (but not limited to): - having physical feature(s) in reasonable proximity that could restrict and contain development - be partially enclosed by existing development, such that new development would not result in an incongruous pattern of development - contain existing development - being subject to other urbanising influences	Site is adjacent to/near a large built up area M25 to east and woodland to north would restrict and contain development, but nothing to contain the development sprawling west toward Chorleywood Site is separated from existing development, so new development would result in an incongruous pattern Site contains limited existing development.
Weak	Assessment areas that make only a weak or no contribution are likely to include those that: - are not adjacent to or near to a large built up area - are adjacent to or near to a large built up area, but containing or being largely enclosed by significant existing development	Site is adjacent to/near a large built up area, does not contain or is not enclosed by significant existing development given the extensive open space to the west and south.

- 7.2.27 The commentary above does not conclude on the contribution to this purpose, but sets out the considerations against the PPG.
- 7.2.28 b) to prevent neighbouring towns from merging into one another: Planning Practice Guidance is clear that this purpose relates to the merging of towns, not villages.
- 7.2.29 Planning practice guidance sets out illustrative features that may suggest whether a site makes a strong, moderate or weak contribution to this purpose. The text is included in the table below, and includes officer’s consideration.

Contribution	Illustrative Features	Officer Commentary
Strong	Assessment areas that contribute strongly are likely to be free of existing development and include all of the following features: - forming a substantial part of a gap between towns - the development of which would be likely to result in the loss of visual separation of towns	The site is generally free of existing development. Even if consideration were given to the gap between Rickmansworth and Chorleywood, it is not considered that the site forms a substantial part of the gap, on the basis that there would still remain open land between the two settlements. It is acknowledged that the gap is relatively small, and would be made smaller by this development. The illustrative development would not result in the total loss of visual separation, as there would remain visual gaps between the two areas from Shepherds Lane and Berry Lane. However, it would diminish visual separation because of the spread of built development along Shepherds Lane, and because the northern part of the development would likely be visible if not from Berry Lane, then from wider viewpoints within Chorleywood, resulting in the development appearing to encroach over the hill toward Chorleywood.
Moderate	Assessment areas that contribute moderately are likely to be located in a gap between towns, but include one or more features that weaken their contribution to this purpose, such as (but not limited to): - forming a small part of the gap between towns - being able to be developed without the loss of visual separation between towns. This could be (but is not limited to) due to the presence or the close proximity of structures, natural landscape elements or topography that preserve visual separation	The site is considered to form a small part of the gap. Some visual separation would remain, in part due to the topography and landscape elements that preserve visual separation.
Weak or none	Assessment areas that contribute weakly are likely to include those that: - do not form part of a gap between towns, or - form part of a gap between towns, but only a very small part of this gap, without making a contribution to visual separation	The site does form part of a gap between two towns.

7.2.30 d) the preserve the setting and special character of historic towns. The development subject of this application, and indeed the site, is not considered to form part of the setting of a

historic town and has no important visual relationship with historic aspects of the town. Therefore there is no conflict with this purpose.

Compliance with NPPF155

- 7.2.31 Having reviewed whether the proposal meets the definition of Grey Belt, it is necessary to understand whether there is compliance with the four paragraphs within NPPF155:
- 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;*
- 7.2.32 Planning Practice Guidance states “*In reaching this judgement, authorities should consider whether, or the extent to which, the release or development of Green Belt Land would affect the ability of all the remaining Green Belt across the area of the plan from serving all five of the Green Belt purposes in a meaningful way*”. It is acknowledged that a significant proportion of the district is within the Green Belt. The application site extends to some 25.9ha, not all of which would be developed. It is considered that the proposal would result in harm to purpose c) of the Green Belt “to assist in safeguarding the countryside from encroachment”. However, notwithstanding the conclusion of whether the development would utilise grey belt land, it is not considered that the development would fundamentally undermine the purposes of the remaining Green Belt across the area of the plan.
- b) There is a demonstrable unmet need for the type of development proposed*
- 7.2.33 The application proposes the development of residential houses, a care home, medical centre and local centre.
- 7.2.34 The council can only demonstrate a 1.2 year housing land supply, and on that basis alone it is considered that there is a demonstrable unmet need for housing. The application proposes 333 houses, 50% of which would be affordable, and this would go toward the unmet need. In addition the proposed care home would provide for the need evidenced in the South West Herts Local Housing Needs Assessment 2024.
- 7.2.35 In respect of the medical centre, the application includes a letter from representatives of the Gade and Chorleywood Health Centres confirming the current premises are constrained and the practice is exploring opportunities to expand and modernise its accommodation. The Integrated Care Board recognises that Gade House Surgery is very constrained.
- 7.2.36 The application does not evidence a ‘demonstrable need’ for the local centre.
- c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework.*
- 7.2.37 The applicant has put forward a case that the site is in a sustainable location, commenting on the site being well related to nearby settlements, a range of services and facilities including two primary retail areas within 20 minute walk, strong public transport accessibility by train and bus (including extending bus routes through the site), enhancing active travel routes, a large number of schools nearby and access to local green space. The objections from Hertfordshire County Council as Highway Authority are noted, and the applicant has provided a response to this which is under consideration at the time of writing. Therefore there is no conclusion at this time as to whether the site is ‘sustainable’.
- d) Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157.*

156. Where major development involving the provision of housing is proposed on land released from the Green Belt through plan preparation or review, or on sites in the Green

Belt subject to a planning application, the following contributions ('Golden Rules') should be made:

a) affordable housing which reflects either: (i) development plan policies produced in accordance with paragraphs 67-68 of this Framework; or (ii) until such policies are in place, the policy set out in paragraph 157 below

7.2.38 Para 157 requires, in this instance, the affordable housing contribution to be 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. The scheme includes 50% affordable housing, with a split of 70% social rent and 30% shared ownership.

7.2.39 In relation to the care home element, this does remain a housing use and therefore eligible to provide a contribution toward affordable housing. The Development Plan does not seek contributions from this particular use, and therefore the policy starting point for a contribution is 0%. Having regard to Para 157 and a contribution to be 15% above the highest existing affordable housing requirement which would otherwise apply, this would result in the need for a 15% affordable housing contribution for the care home element. It is considered reasonable that this be secured as a commuted sum, and would be based on £/sqm of 15% of the total habitable floor space of the building.

b) necessary improvements to local or national infrastructure

7.2.40 The application proposes improvements to infrastructure including the provision of a medical facility, the provision of a local centre which will include community facilities, the provision of off-site improvements to the road and public right of way network in the vicinity of the site, improvements to the transport network including routing a bus through the site, the provision of green spaces and the provision of financial contributions toward primary, secondary and SEND school provision and toward NHS facilities.

c) the provision of new, or improvements to existing, green spaces that are accessible to the public. New residents should be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces

7.2.41 The development will provide new green spaces that are accessible to the public. These will be within a short walk of the proposed homes and will include cycle routes and walking routes, and play equipment.

Conclusions in respect of Green Belt matters

7.2.42 The above sets out that the proposed development does not meet any of the exceptions to inappropriate development at NPPF154. In respect of NPPF155, it will be necessary first to ascertain whether the development would utilise Grey Belt land. If it does not, the development cannot comply with NPPF155. If it does, it is necessary to consider whether the development meets the requirements of NPPF155.

7.2.43 Separately, it is necessary to consider whether the proposal would meet the Golden Rules at NPPF156 and the appraisal above sets out that the site may well comply, which introduces a NPPF-led requirement to give significant weight in favour of the grant of permission.

7.2.44 If it is considered that the development complies with NPPF155-157, it would be appropriate in the Green Belt. If the development does not comply with NPPF155-157, it would be inappropriate development. In such a circumstance, it is necessary to consider whether very special circumstances exist which outweigh the potential harm to the Green Belt by reason of inappropriateness, and any other harm. Further information on this is set out at the end of this report.

7.3 Impact on the character and appearance of the area and on the wider landscape

- 7.3.1 Policy CP1 of the Core Strategy (adopted October 2011) seeks to promote buildings of a high enduring design quality that respect local distinctiveness and Policy CP12 of the Core Strategy (adopted October 2011) relates to design and states that in seeking a high standard of design the Council will expect development proposals to 'have regard to the local context and conserve or enhance the character, amenities and quality of an area'. Development should make efficient use of land but should also respect the 'distinctiveness of the surrounding area in terms of density, character, layout and spacing, amenity, scale, height, massing and use of materials'; 'have regard to the local context and conserve or enhance the character, amenities and quality of an area' and 'incorporate visually attractive frontages to adjoining streets and public spaces'.
- 7.3.2 Policy 2 of the Chorleywood Neighbourhood Development Plan requires all developments to demonstrate how they are in keeping with and where possible enhance the special characteristics of Chorleywood. All development should seek to make a positive contribution to the 'street scene' by way of frontage, building line, scale and design. The Chorleywood Neighbourhood Development Plan states that "the Parish's key feature is its 'rural feel'" and that "however you enter or leave the Parish you cannot fail to appreciate the 'rural character Chorleywood has".
- 7.3.3 This application is submitted in outline, with only matters of access for detailed consideration. An illustrative masterplan has been submitted which indicate how the development could be laid out within the site. This includes the location of the main streets within the development, the location of the care home, GP surgery, local centre, houses and open space. The submitted Design and Access Statement provides further details on the illustrative layout, splitting the site into six character areas. This also includes a Design Code for the masterplan, setting out the design intent to reflect the site's rural context.
- 7.3.4 The illustrative masterplan shows how the development would be planned around the retention of the majority of existing trees and hedgerows around and within the site. The masterplan also includes the provision of walking and cycling routes within and through the site, to provide a link from Shepherds Lane to Berry Lane. Interfaces are also proposed between the site and the existing public footpath network.
- 7.3.5 The application is accompanied by a Landscape and Visual Impact Assessment, which appraises the potential effects of the proposed development. It concludes that landscape effects associated with the removal of internal vegetation are offset by retention of high value boundary trees and the delivery of new woodland, hedgerow and other planting. Changes to the landscape character are local to the site and reflect a transition to a settled Green Belt edge character. Effects on the Heronsgate Heights Landscape Character Area would be limited, and effects on Green Belt openness are localised to the site. Mitigation measures are embedded into the illustrative design, including proposed planting, the location of open spaces, longer term landscape and ecological management.
- 7.3.6 Comments have been received from the council's Urban Design consultant, and Landscape Consultant, regarding the illustrative layout of the proposal and the potential landscape impacts. The applicant has reviewed these, and provided some response and some queries. These remain under consideration.
- 7.3.7 Ultimately, this application is submitted in outline with only access to the site for detailed consideration. This application does not consider Appearance or Layout (which are reserved for consideration at a later date and as part of a future formal submission in the event outline planning permission is granted).

7.4 Affordable and Specialist Housing

- 7.4.1 Core Strategy Policy CP4 states that in order to increase the provision of affordable homes in the district and meet local housing need, the council will seek an overall provision of around 45% of all new housing as affordable housing, incorporating a mix of tenures. All new development resulting in a net gain of one or more dwellings will be expected to contribute to the provision of affordable housing. As a guide, 70% of affordable housing would be social rented and 30% intermediate.
- 7.4.2 For a major planning application such as this, it would be expected that all affordable housing is provided on site. This is reflected in Policy CP4 and the Affordable Housing SPD. This application proposes the delivery of up to 333 houses, of which 50% (167) will be secured as affordable housing. This is in excess of the 45% policy requirement which would equate to 150 affordable homes. The submission sets out that of the affordable housing 70% will be social rent, and 30% intermediate. The remaining 166 dwellings will be market dwellings. This proposed affordable housing level would exceed the 45% requirement of Core Strategy Policy CP4 (which would require 150 affordable dwellings), therefore providing 17 affordable dwellings over the policy requirement.
- 7.4.3 Policy 4.3 of the Chorleywood Neighbourhood Plan states that “*Sites of 10 or more dwellings should include dwellings suitable for elderly / disabled persons or smaller dwellings suitable for first time buyers / downsizers*” and Policy 4.4 states “*Sites for 50 or more dwellings must include at least 40% of dwellings suitable for elderly / disabled persons and smaller dwellings suitable for first time buyers / downsizers*”. In response, the application proposes 50% of all houses to be secured as affordable housing.
- 7.4.4 The application also proposes a 66 bed care home which ensures the development provides bed spaces specifically catered for elderly persons (as required by the Chorleywood Neighbourhood Plan). The Affordable Housing SPD states “if the residential accommodation has shared facilities and is not therefore self contained, as in the case of some supported housing and residential care homes, it is regarded as an institutional use and Policy CP4 will not apply”. On that basis, subject to the proposed care home being secured to operate within Use Class C2 (Residential institutions - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres), Policy CP4 does not apply to this part of the proposed development.
- 7.4.5 The proposal would therefore exceed the requirements of Policy CP4 in providing affordable housing in excess of the basic policy requirement.

7.5 Housing Mix

- 7.5.1 Policy CP3 sets out that the Council will require housing proposals to take into account the range of housing needs as identified by the Strategic Housing Market Assessment (SHMA) and subsequent updates. The need set out in the Core Strategy is 30% one-bedroom units, 35% two-bedroom units, 34% three-bedroom units and 1% four bedroom and larger units. However, 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:

	1-bed	2-bed	3-bed	4+ bed
Market Housing	4%	21%	42%	32%
Proposed Market Housing in this app	0	8%	60%	32%
Affordable Home Ownership	19%	39%	30%	13%
Social / Affordable Rented Housing	20%	32%	35%	12%
Proposed Affordable Housing in this app	0	31%	66%	3%

- 7.5.2 The housing mix is not a matter being determined at outline stage and would be determined at Reserved Matters stage. However, it is noted that the applicant has confirmed the affordable housing would be delivered as 52x two-bed homes, 110x three bed homes, and 5x four-bed homes.
- 7.5.3 It is noted that the scheme does not propose any one bedroom properties. The Housing Development Officer has reviewed the proposed housing mix and confirms "Housing Services would be generally supportive of the proposed development, noting that it provides a good mix of family-sized homes and that 70% of the affordable housing is proposed as social rent, with the remaining 30% as affordable housing. This approach aligns with identified local housing needs, particularly the demand for larger family accommodation".
- 7.6 Impact of proposal on heritage assets
- 7.6.1 Strategic Objective S10 of the Core Strategy is "To conserve and enhance the historic environment by resisting the loss of, or damage to, heritage assets including important buildings". Core Strategy Policy CP12 states that "in seeking a high standard of design, the Council will expect all development proposals to conserve and enhance natural and heritage assets".
- 7.6.2 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states:
- "In the exercise, with respect to any buildings or other land in a conservation area, of any functions under or by virtue of any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area"
- 7.6.3 Paragraph 208 of the NPPF advises that:
- "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."
- 7.6.4 Paragraphs 212 and 213 of the NPPF state that:
- "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance."
- "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification."
- 7.6.5 Paragraph 215 of the NPPF advises that:
- "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal..."
- 7.6.6 The NPPG advises that public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a private benefit.

However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

- 7.6.7 DMP Policy DM3 refers to the historic built environment and notes that when assessing applications for development, there will be a presumption in favour of the retention and enhancement of heritage assets. Applications will only be supported where they sustain, conserve and where appropriate enhance the significance, character and setting of the asset itself and the surrounding historic environment.
- 7.6.8 Chorleywood Neighbourhood Development Plan policy 1 states that permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views in to or out of that Conservation Area.
- 7.6.9 Impact on the setting of the Chorleywood Common Conservation Area
- 7.6.10 Chorleywood Common was designated a conservation area in 1976 and was designated for its historic and architectural interest (which originates from the open rural nature of the Common and the integration of the built form surrounding it). Historically the common has been used for grazing land used by the commoners for the exercise of their common rights of pasture and to harvest wood. The existence of trees and scrub land contrasts strongly with the appearance of the Common in past centuries when the area would have been free of such greenery. The character appraisal notes "The built form located along the fringes of the Common is considered to be subservient to the vast expanse of the Common, thus, maintaining the open and rural character of the Conservation Area". The appraisal sets out that "the overwhelming character of the Chorleywood Common Conservation Area is rural, centring around an open common".
- 7.6.11 The site is immediately south of Character Zone C which covers part of Chorleywood Bottom and the lower edge of the Common. The appraisal sets out that the architectural style is predominantly 20th century with large modern houses running along Berry Lane. It states that on the whole, these buildings cannot be seen from the Common as they are shielded by woodland. It confirms that many of the roads in this zone retain the 'rural' character of the Conservation Area, with open field systems and established hedgerows.
- 7.6.12 DM Policy DM3 states that "permission will not be granted for development outside but near to a Conservation Area if it adversely affects the setting, character, appearance of or views into or out of that Conservation Area".
- 7.6.13 The submitted Heritage Statement acknowledges that there is intervisibility from the common toward the site, but that this is not a prominent view and intervening residential development is present. It acknowledges there will be change within the conservation area's wider setting, but considers the change affects a small part of a much wider setting and that areas contributing the most would remain unaffected. The statement concludes there would be no harm to the significance of the conservation area.
- 7.6.14 Initial comments from the conservation officer requests further information in respect of the impacts on the conservation area, particularly in views from Chorleywood Bottom just north of the railway bridge. This further information has been provided by the applicant and is under consideration by the conservation officer.
- 7.6.15 Impact on the setting of the nearby Listed Buildings and Locally Important Buildings
- 7.6.16 There are a number of listed buildings close to the site, but no listed buildings directly adjoin the site. Approximately 500m to the west of the site is the Grade II* listed Kings John's Farm, Penn Cottage, Penn Farm and Garden Wall. As a result of the separation distance and the presence of intervening woodland, there is no intervisibility between the two sites. The submitted Heritage Statement identifies no harm to significance. The conservation

officer confirms the proposal would have an acceptable impact on the significance of the Grade II* buildings.

- 7.6.17 The conservation officer has considered the potential impacts on Dapplemere (Shepherds Lane, a locally listed building over 500m west of the site) and considers there is no historic connection and limited scope for intervisibility with the site, and the proposal would have an acceptable impact on this building.
- 7.6.18 In respect of the building south of Berry Lane at West Clayton Business Centre, the conservation officer notes the site only makes limited contribution to its significance and the impact is likely to be acceptable
- 7.6.19 In respect of the on-site buildings, the conservation officer notes the proposal would result in the complete loss of the original Farmhouse and barns and notes that these buildings may have relevant characteristics that qualify them for inclusion as locally important buildings. Further information has been received from the applicant in this respect, and remains under consideration by the conservation officer.
- 7.6.20 Impact on Archaeology
- 7.6.21 In respect of Archaeology the application is accompanied by an Archaeological Desk Based Assessment. This concludes that the site is considered to have a high potential for post-medieval and modern remains, medium potential for prehistoric and medieval archaeological remains, low to medium potential for Roman remains and low potential for early medieval remains.
- 7.6.22 The Historic Environment Advisor notes very few archaeological investigations have been carried out in the area, and the closest from 2009 during the M25 widening revealed Neolithic pottery, Iron Age pits ditches and field boundary, and late Iron Age/early Roman hearth debris. They note the site is topographically suitable location for settlement and that the development should be regarded as having the potential to have an impact on heritage assets of archaeological interest. These can be protected through condition, including securing a geophysical survey of the area before works take place, field evaluation, and any mitigation measures required by that evaluation. Subject to condition, no objections are raised in respect of archaeological implications.

7.7 Highways Impacts

- 7.7.1 Core Strategy Policy CP10 relates to Traffic and Travel, and states that Development proposals will be expected to contribute to the delivery of transport and travel measures identified as necessary for the development, either on-site as part of the development or through contributions to off-site provision as appropriate. Provision for interchange and access by public transport, walking and cycling will be regarded as particularly important. The policy explains that all development should be designed and located to minimise the impacts of travel by motor vehicle on the District. Clearly the development subject of this application is specifically designed to cater for travel by motor vehicle.
- 7.7.2 Policy CP10 states that Development will need to demonstrate that it provides a safe and adequate means of access, is appropriate in scale to the existing transport infrastructure and where necessary infrastructure can be improved. It is necessary for the impact of the proposal on transport to be fully assessed through a comprehensive Transport Assessment.
- 7.7.3 The NPPF at para 115 sets out that in assessing...specific applications for development it should be ensured that

- a) sustainable transport modes are prioritised taking account of the vision for the site, the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users;*

c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code⁴⁸; and
d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree through a vision-led approach

- 7.7.4 Paragraph 116 states that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation, would be severe, taking into account all reasonable future scenarios”.
- 7.7.5 Policy CP1 of the Core Strategy (adopted October 2011) advises that in ensuring all development contributes to the sustainability of the District, it is necessary to take into account the need to reduce the need to travel by locating development in accessible locations and promoting a range of sustainable transport modes.
- 7.7.6 Policy CP10 (Transport and Travel) of the Core Strategy (adopted October 2011) advises that all development should be designed and located to minimise the impacts of travel by motor vehicle on the District. Development will need to demonstrate that:
- i) It provides a safe and adequate means of access*
 - j) It is appropriate in scale to the existing infrastructure...*
 - k) It is integrated with the wider network of transport routes...*
 - l) It makes adequate provision for all users...*
 - m) It includes where appropriate, provision for public transport either within the scheme or through contributions*
 - n) The impact of the proposal on transport has been fully assessed...*
 - o) The proposal is accompanied by a draft Green Travel Plan*
- 7.7.7 Policy 10 of the Chorleywood Neighbourhood Development Plan requires developments of 10 or more dwellings to provide satisfactory information and proportionate evidence which demonstrates that the development is or could be practicably made accessible to Chorleywood station and environs around Lower Road by safe pedestrian and cycle routes. Policy 15 states that existing public rights of way and means of public access will be protected and where possible enhanced by any development.
- 7.7.8 The Transport Assessment accompanying the application includes an accessibility audit, which sets out the site is 1.4km from Chorleywood centre and 2.5km from Rickmansworth. There are 6 primary schools within 2.6km of the site. The site has public rights of way in close proximity, including around the eastern and northern sides. The site will include access to those routes. The proposal will provide an alternative route to the LCWIP’s Route 14 between Chorleywood and Mill End. In respect of busses, the development anticipates S106 contributions to fund alternate bus routes for the R1 and R2 busses to turn into the site, to increase frequency to one an hour for the R1 from one every two hours, to increase the duration of the R1 service from 7.5 hours to 11.5 hours and the duration of the R2 service from 5 hours to 9. It would also introduce Saturday running for the R1. The development accounts for providing cycle storage for Beryl or Brompton bikes, and two car-club vehicles on a three year rolling contract.
- 7.7.9 At the time of writing HCC as Highway Authority (HA) have recommended refusal of this application on highway grounds. Their full comments are set out at 9.8 below. The HA note that the site is between Rickmansworth and Chorleywood, but closer to facilities of Chorleywood. They note that whilst the straight line distance between the site and Chorleywood is short, there are concerns about the nature of the routes to Chorleywood. It is necessary to use Shepherds Lane or Berry Lane, which are both considered to be unsuitable to be utilised as principle access routes into Chorleywood. They acknowledge the proposed upgrades to the PROWs in the area, but consider the inherent constraints of

the network including width, gaps and the physical environment mean they would not be viable walking routes. There are also concerns that access for vehicles from the Chorleywood side of the development could lead to conflicts because of the semi rural nature of Shepherds Lane and Berry Lane, and concerns for residents accessing the site from Chorleywood. They consider that despite the bus improvements proposed, private car would be a more favourable option for short trips. Following receipt of these comments, the applicant has prepared a response and this is being considered by the Highway Authority.

7.7.10 National Highways have raised no objections to the proposal in respect of any impacts on the strategic road network.

7.7.11 Transport for London have reviewed the submission and have no comments to make.

7.8 Vehicle Parking

7.8.1 Development Management Policy DM13 requires development to make provision for parking in accordance with the parking standards and zone based reductions set out in Appendix 5.

7.8.2 As previously noted, this application is submitted in outline with matters of access for consideration. The site's layout would be considered at a later date as a reserved matter and it is expected that the proposed car parking layout and provision would be dealt with at that time.

7.9 Impact on amenity of neighbouring occupiers

7.9.1 Paragraph 135 of the NPPF advises that planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

7.9.2 Policy CP12 of the Core Strategy (adopted October 2011) states that the Council will expect development proposals to protect residential amenities.

7.9.3 The application is submitted in outline, with matters of access for consideration. However, the application is accompanied by an illustrative masterplan which suggests a form of development where a significant buffer distance could be maintained between the nearest neighbouring residential properties (fronting Berry Lane) and the built form within the application site. This matter would be considered in detail at the reserved matters stage but it is considered that in principle the development could be laid out to ensure no adverse impact on the amenities of neighbours in respect of privacy or overbearing/visual impacts.

7.10 Pollution – Air Quality

7.10.1 Paragraph 187 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by amongst other considerations:

(e) Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;

7.10.2 The NPPG provides guidance as to when air quality would be relevant to a planning decision. In summary, it states that when reviewing the specific issues to be considered when assessing air quality impacts, consideration would be given to whether the development would:

- Lead to changes in vehicle related emissions, through providing EV charging infrastructure or significantly changing traffic volumes, speeds or both, or significantly changing traffic composition on local roads;
- Introduce new point sources of air pollution (eg furnaces);
- Expose people to harmful concentrations of air pollutants.

7.10.3 In relation to air quality, Policy DM9 of the Development Management Policies LDD (adopted July 2013) advises that development will not be permitted where it would:

- Have an adverse impact on air pollution levels, particularly where it would adversely affect air quality in an Air Quality Management Area and/or
- Be subject to unacceptable levels of air pollutants or disturbance from existing pollutant sources.

7.10.4 It is noted that the application site is adjacent to the M25 motorway, which runs to the immediate east of the site. The application has been accompanied by an Air Quality Assessment (AQA) which acknowledges that the site's air quality is mostly influenced by road traffic emissions. The AQA considers the impacts at both the construction phase and operational phase. In respect of the construction phase, planning conditions can be used to secure mitigation to reduce impacts of air pollution on residents of adjoining sites. In respect of the operational phase, the development is considered to have a negligible impact. In terms of future exposure of occupants of the development, the modelling shows no risk of exceedances at the site.

7.10.5 The Environmental Health Officer has reviewed the AQA and is satisfied with the conclusions drawn for the operational aspects of the report, and has no further questions nor the need to request any specific planning conditions.

7.11 Pollution – Noise

7.11.1 Paragraph 187 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by amongst other considerations:

(e) Preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans;

7.11.2 Policy DM9 sets out that planning permission will not be granted for development has an unacceptable adverse impact on the indoor and outdoor acoustic environment of existing or planned development, has an unacceptable adverse impact on countryside areas of tranquillity which are important for wildlife and countryside recreation.

7.11.3 The application is accompanied by a Noise Impact Assessment. This was informed by an environmental noise survey with measurements undertaken over a 5 day period in three locations to establish baseline noise levels. The assessment sets out the acoustic design measures used to reduce noise impacts. These include using a buffer zone to separate the development from the M25, the use of noise barriers, orienting buildings to provide screening to other properties and amenity areas, and designing the building envelope to ensure appropriate conditions for residential amenity.

7.11.4 The application is submitted in outline, and therefore there is no final layout or appearance under consideration. This means there is no fixed location for the proposed buildings, nor fixed design for the development. However, the assessment is based on assumptions of the building facades including the wall construction material, and the type of windows, and ventilation systems. It also suggests specification for garden fences and sets out that subject to compliance with these, noise would be within acceptable levels. Should noise

mitigation measures lead to overheating in the context of Part O of the Building Regulations, measures are specified to address this.

- 7.11.5 Subject to the design, it is considered that the site could be occupied with suitable acoustic conditions for occupation/use of all the buildings on site.

7.12 Pollution – Light

- 7.12.1 Policy DM9 sets out that development proposals which include external lighting should ensure that proposed lighting schemes are the minimum required for public safety and security, that there is no unacceptable impact on neighbouring or nearby properties or the surrounding countryside or wildlife.

- 7.12.2 No details of lighting have been provided, because this is an outline application. The impacts of any lighting, on the character and amenity of the area and on wildlife, would be considered as part of a Reserved Matters application in the event outline permission is granted.

7.13 Pollution – Land Contamination

- 7.13.1 Policy DM9 states that the Council will only grant planning permission for development on, or near to, former landfill sites or on land which is suspected to be contaminated where the Council is satisfied that there will be no threat to the health of future users or occupiers of the site or neighbouring land, and there will be no adverse impact on the quality of local ground water or surface water quality.

- 7.13.2 The application is accompanied by a Phase I Geo-Environmental Risk Assessment. This concludes that the presence of significant contamination sources is considered unlikely, but due to the site's use, the presence of localised residual contamination is anticipated. A historic landfill has been identified which may represent local source of ground gas and contamination. The overall risk is considered to be low. The Assessment sets out a series of recommendations, including undertaking intrusive investigations, risk assessments for construction and maintenance work, asbestos surveys, watching brief during development to identify unanticipated contamination, and consideration of soil/material retention/re-use.

- 7.13.3 The Assessment has been reviewed by the Environmental Health Officer. They consider that contaminated land matters can be dealt with by suitably worded planning conditions which could secure a risk assessment to investigate potential plausible contaminant linkages, with more detailed follow-on risk assessments if needed, remediation options appraisal, and remediation verification report.

7.14 Impact on Wildlife, Biodiversity and Agricultural Land

- 7.14.1 Section 40 of the Natural Environment and Rural Communities Act 2006 requires Local Planning Authorities to have regard to the purpose of conserving biodiversity. This is further emphasised by regulation 3(4) of the Habitat Regulations 1994 which state that Councils must have regard to the strict protection for certain species required by the EC Habitats Directive.

- 7.14.2 Paragraph 187 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by:

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

- 7.14.3 Footnote 65 states “Where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality”.
- 7.14.4 Paragraph 185 of the NPPF advises that to protect and enhance biodiversity and geodiversity, plans should: *b) promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.*
- 7.14.5 Policy CP1 of the Core Strategy (adopted October 2011) advises that; “all development in Three Rivers will contribute to the sustainability of the District. This means taking into account the need to” (amongst other things) (f) “protect and enhance our natural, built and historic environment from inappropriate development and improve the diversity of wildlife and habitats”. Policy CP9 of the Core Strategy (adopted October 2011) advises that; “The Council will seek a net gain in the quality and quantity of Green Infrastructure, through the protection and enhancement of assets and provision of new green spaces”.
- 7.14.6 Policy DM6 of the Development Management Policies LDD advises that development should result in no net loss of biodiversity value across the District as a whole.
- 7.14.7 The applicant has submitted an Agricultural Land Classification report which concludes the land is Grade 3B and 4 land which is not considered best and most versatile land.
- 7.14.8 In respect of mandatory Biodiversity Net Gain, the submission includes Biodiversity Net Gain calculations which detail that the development would result in a 29.6% decrease in habitat units and 19.3% increase in hedgerow units. Mandatory BNG will therefore be met via off-site credits in addition to on-site gains. The gain is achieved with the creation of both on-site and off site habitats. Herts Ecology have reviewed the proposed BNG, and have requested further information.
- 7.14.9 In respect of other ecological matters, Herts Ecology have requested further information in respect of impacts on the local wildlife site and ancient woodland and further information on protected species.
- 7.15 Impact on trees and landscaping
- 7.15.1 As previously noted, this application is submitted in outline with landscaping a reserved matter. Nevertheless, the application includes illustrative landscaping details within the proposed masterplan and Design and Access Statement.
- 7.15.2 Development Management Policy DM6 notes that proposals for new development should be submitted with landscaping proposals which seek to retain trees and other important landscape and nature conservation features. Development proposals on sites which contain existing trees and hedgerows will be expected to retain as many trees and hedgerows as possible. It also notes that planning permission will be refused for any development resulting in the loss or deterioration to protected woodland, protected trees, and hedgerows unless conditions can be imposed to secure their protection. It states that where the felling of a tree or hedgerow is permitted, a replacement tree or hedge of an appropriate species, size and in a suitable location will be required.
- 7.15.3 The NPPF sets out at para 193c) that “development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”.
- 7.15.4 The application is accompanied by an Arboricultural Impact Assessment which confirms that tree removals would be required. This does not detail the total number of trees but includes 15 individual trees and the removal of a section or the entirety of 13 groups of trees. These are a combination of trees located centrally within the site, trees within the Shepherds Lane frontage (note this is not all trees but a limited number). The illustrative

masterplan shows considerable areas where new trees and soft landscaping could be provided.

7.16 Energy Use

- 7.16.1 Paragraph 161 of the NPPF states that “The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure”.
- 7.16.2 Policy CP1 of the Core Strategy requires the submission of an Energy and Sustainability Statement demonstrating the extent to which sustainability principles have been incorporated into the location, design, construction and future use of proposals and the expected carbon emissions.
- 7.16.3 Policy DM4 of the DMLDD requires applicants to demonstrate that development will produce 5% less carbon dioxide emissions than Building Regulations Part L (2013) requirements having regard to feasibility and viability. This may be achieved through a combination of energy efficiency measures, incorporation of on-site low carbon and renewable technologies, connection to a local, decentralised, renewable or low carbon energy supply. The policy states that from 2016, applicants will be required to demonstrate that new residential development will be zero carbon. However, the Government has announced that it is not pursuing zero carbon and the standard remains that development should produce 5% less carbon dioxide emissions than Building Regulations Part L (2013) requirements having regard to feasibility and viability.
- 7.16.4 The application is accompanied by an Energy Statement. This sets out the measures that would be incorporated into the development to deliver the energy standard, and includes energy efficient building fabric and insulation, high efficiency double glazing and heating systems including air source heat pumps and low energy lighting. These measures would all ensure the development can meet an approximate 60.3% reduction in CO2 emissions compared to the 2021 Building Regulations requirement. The non-residential elements would also be designed using similar measures. As this application does not seek approval for the appearance or layout of the proposed buildings, it is anticipated that any future Reserved Matters submission would provide full details of the energy efficiency of the proposed buildings and demonstrate their ability to comply with Policy DM4.

7.17 Flood Risk and Drainage

- 7.17.1 Policy CP1 requires all development in Three Rivers to contribute to the sustainability of the District, by minimising flood risk through the use of Sustainable Drainage Systems. Policy DM8 refers to Flood Risk and Water Resources, and states that development will only be permitted where it would not be subject to unacceptable risk of flooding. It also states that Development in all areas should include Sustainable Drainage Systems to reduce surface water runoff.
- 7.17.2 The application has been accompanied by a Flood Risk Assessment and Sustainable Drainage Strategy.
- 7.17.3 The application site is located within Flood Risk Zone 1 (ie lowest risk of fluvial flooding). There are a small number of isolated pockets of potential surface water flooding within the site, with a larger surface water flow identified to the north of the site through Pheasants Wood.

- 7.17.4 The Environment Agency have reviewed the submitted Flood Risk Assessment and GeoEnvironmental Risk Assessment and have confirmed they have no objections, subject to conditions. They note the potential for the farm use to result in sources of contamination being present, and the presence of historic landfill beneath the site which could also cause contamination. They also note the informal storage of waste and chemicals at the site. Planning conditions are recommended to ensure any impacts of these are fully investigated and remediated. These include the need to provide a Remediation Strategy, a plan to deal with any previously unidentified contamination, long term monitoring of groundwater, management of boreholes, the submission of a verification report confirming completion of remediation works, the need for any piling scheme to be agreed before taking place, and the need for a final drainage scheme to be agreed.
- 7.17.5 Affinity Water have reviewed the submitted documents and have confirmed that provided a number of planning conditions are attached, they would have no objections in respect of any impact on the public water supply. These include conditions requiring the submission of a ground investigation and remediation report, risk assessment, foundation works method statement, and details of the design of the surface water drainage scheme.
- 7.17.6 Thames Water have identified that the existing foul water network does not have sufficient capacity to support the proposed development, and require a planning condition that prohibits the occupation of the development until all necessary upgrades to the foul water network to accommodate additional flows from the development have been completed, or a phasing plan for development and infrastructure is in place. Advice is also given to ensure that the development minimises ground water discharges into the public sewer.
- 7.17.7 The Lead Local Flood Authority have reviewed the submitted Flood Risk Assessment and have raised no objection subject to conditions

7.18 Refuse and Recycling

- 7.18.1 Policy DM10 (Waste Management) of the DMLDD advises that the Council will ensure that there is adequate provision for the storage and recycling of waste and that these facilities are fully integrated into design proposals. New developments will only be supported where:
- i) The siting or design of waste/recycling areas would not result in any adverse impact to residential or work place amenity
 - ii) Waste/recycling areas can be easily accessed (and moved) by occupiers and by local authority/private waste providers
 - iii) There would be no obstruction of pedestrian, cyclists or driver site lines
- 7.18.2 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.
- 7.18.3 HCC require a Site Waste Management Plan (SWMP) to be submitted which should aim to reduce the amount of waste produced on site. 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. This can be secured by condition.

7.18.4 HCC note the submitted Outline Solid Waste Management Strategy which states a SWMP would be prepared, along with a Construction Traffic Management Plan and Construction Environmental Management Plan, and that overall the strategy provides a good base for the production of a SWMP which should be secured by condition.

7.18.5 In relation to minerals, the site falls within the 'Sand and Gravel Belt' as identified in HCC's 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. 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.

7.18.6 In respect of domestic waste, it is considered that further details regarding the storage and management of waste on site would be considered at the reserved matters stage.

7.19 Infrastructure Contributions

7.19.1 Policy CP8 of the Core Strategy requires development to make adequate contribution to infrastructure and services. The Three Rivers Community Infrastructure Levy (CIL) Charging Schedule sets out that the charge per sq.m of residential development in this area is £180 (plus indexation).

7.19.2 The following infrastructure contributions have been identified by the applicant:

- Contribution toward and initial funding/maintenance of cycle rental scheme
- £1.75m toward bus services
- Contribution toward funding a car club
- Provision of care home with specific servicing specialisms
- Contribution toward education provision
- Contribution toward off site highways works
- Provision of medical centre

7.19.3 It is anticipated that Hertfordshire County Council as Local Highway Authority will require contributions and highways works to be secured. Further details will be provided once received.

7.19.4 Hertfordshire County Council as Education Authority have calculated that contributions are required toward Primary Education (£6,011,658 toward a new school on land east of Green Street or provision serving the development), Secondary Education (£4,498,255 toward the expansion of Reach Free School), SEND provision (£622,107 toward new SLD school places).

7.19.5 In addition the County Council identify the need for a contribution of £41,252 toward increasing capacity at Waterdale Transfer Station.

7.19.6 The Hertfordshire and West Essex Integrated Care Board have requested £602,611.80 toward healthcare facilities in the area, in addition to £112,860.36 toward Mental Health services and £117,442.44 toward Community Healthcare.

7.20 Referral to Secretary of State

7.20.1 The Town and Country Planning (Consultation) (England) Direction 2024 requires Local Planning Authorities to consult the Secretary of State before granting planning permission for certain types of development. These include inappropriate developments in the Green Belt that by reason of their scale or nature or location would have a significant impact on the openness of the Green Belt. In the event that it is concluded that the development subject of this application is acceptable although contrary to the Development Plan, or that

very special circumstances exist which are considered to outweigh the harm to the Green Belt by inappropriateness and any other harm, it would be necessary for the LPA to consult the Secretary of State prior to a decision being issued.

- 7.20.2 Furthermore, The Town and Country Planning (Consultation) (England) Direction 2026 states that “Where a local planning authority proposes to refuse an application for planning permission to which this Direction applies, the authority must consult the Secretary of State before determining the application”. This is applicable to applications for planning permission which include the provision of 150 or more houses. The Local Planning Authority must not determine the application until at least 21 days after the date on which notice is given to the Secretary of State. The purpose of the Direction is to give the Secretary of State an opportunity to consider using the power to call in an application under section 77 of the Town and Country Planning Act 1990. If a planning application is called in, the decision on whether or not to grant planning permission will be taken by the Secretary of State.

7.21 Benefits of the Scheme

- 7.21.1 The submitted Planning Statement sets out the benefits of the scheme which are summarised below:

- Delivery of up to 333 houses, providing a significant contribution to reducing the housing shortage and particularly in light of the government’s intervention in the local plan.
- Delivery of 167 affordable housing units, with a policy compliant tenure mix.
- Delivery of a medical centre (delivered to shell with utility connections) to provide primary medical services to the area.
- Delivery of a care home with 66 beds
- Financial contribution toward enhancing R1 and R2 bus service, including extending the routes into the site, increasing frequency and hours of operation.
- Provision of on site public open space, cycle routes and footpaths, providing links from Shepherds Lane to Berry Lane
- Highway improvements, including a car club, bike rental, traffic calming on Shepherds Lane, improvements to rights of way, provision of new lighting and surface upgrades.
- Community benefits, including car club, café/retail building with community room, improved bus connectivity.
- Economic benefits, including at the construction phase, an increased population to use local services, and the delivery of approximately 48FTE jobs.
- Biodiversity Net Gain via off-site habitat enhancement

- 7.21.2 The benefits of the scheme, including those set out above and any other identified benefits, would need to be considered by the decision maker. These would need to be balanced against any identified harms.

7.22 Tilted Balance and Planning Balances including Very Special Circumstances (Green Belt), Public Benefits (Heritage)

- 7.22.1 As part of the decision making process, there are various planning balances that must be undertaken by the decision maker. Whilst summarised in the title above, these are also explained in the relevant part of this report (for example, the need to consider very special circumstances is explained at the end of the Green Belt section of this report).

- 7.22.2 In respect of the tilted balance, the Council can only demonstrate a 1.2 year housing land supply. As a result, the policies that are most important for determining the application are deemed to be ‘out of date’ and the tilted balance at paragraph 11 of the NPPF applies:

For decision-taking this means:

d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

7.22.3 In respect of d) i. the NPPF sets out that the policies referred to (that protect areas or assets of particular importance) include those relating to land designated as Green Belt, and designated heritage assets.

7.22.4 As part of the assessment of the proposal, it will be necessary to identify which policies are most important for determining the application, and the weight to be attributed to them notwithstanding that they may be considered out of date. It would then be necessary to undertake an assessment under i or ii above.

7.22.5 When undertaking this individual assessment in the context of two linked appeals scheme at Sarratt for a total of 92 new houses and a doctors surgery on two sites off Church Lane in Sarratt, the Inspector made the following observations about the general position of the District in the context of paragraph 11(d) of the NPPF:

94. The relevant legislation requires that the appeal be determined in accordance with the statutory development plan unless material considerations indicate otherwise. The current five year housing supply situation is pressing and acute. The very great need for housing is persistently going unmet. The existing development plan is simply not delivering anywhere near the requisite amount of housing of all types. The Council accepts that the need cannot be met purely within existing settlement boundaries and that significant Green Belt land will need to be built on to meet this unmet need. These circumstances mean inevitable adverse consequences for the openness of the Green Belt, its purposes, and in terms of landscape and visual effects. I consider a plan-led approach to development is certainly desirable, but in this instance, there seems little prospect of a timely plan-led remedy. The overwhelming deficiency in the five year housing supply needs to be addressed as a matter of urgency, rather than waiting for the adoption of a new local plan.

100. However, the Council cannot demonstrate a five year supply of housing, and so the most important development policies are deemed out of date. It is quite clear that the strict application of these policies, especially 'place-shaping' or spatial policies such as Policy PSP4, as well as Policy CP4 on affordable housing, is not leading to sufficient housing of all types being provided in accordance with the Framework, and are restricting development. The overwhelming lack of supply diminishes the weight that can be attached to any conflict with these policies. The demonstration of very special circumstances amounts to powerful material considerations justifying departing from the development plan.

101. The severe housing shortfall attracts very substantial weight in favour of granting permissions for the proposals, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. I am satisfied that none of the reasons put forward for opposing these proposals establishes that the harm would significantly and demonstrably outweigh the benefits. Therefore, notwithstanding any conflict with development plan policies, it follows that both appeals should succeed, subject to conditions. I deal with the conditions below.

7.22.6 In respect of the Planning Balance it will be necessary for the decision maker to take account of the material planning considerations to the case, and balance any adverse impacts of the development against the benefits put forward by the applicant (see section above) and any other identified benefits. Any adverse impacts are likely to primarily be identified as part of an assessment of the proposal against the statutory development plan and other material planning considerations. These would need to be weighed against the benefits which may also be identified as part of the assessment.

7.22.7 As part of a full assessment of the scheme to be presented at a later date, the full extent of any harm arising from the scheme would be identified, and this would be balanced against the benefits of the scheme to enable a recommendation to be made as to whether planning permission may be granted or not.

7.23 Site Visit

7.23.1 It is noted that this development is of a considerable size and scale, impacting a large area of undeveloped land which is designated as Green Belt, and is in close proximity to a conservation area. On that basis, it is recommended that Members agree to a site visit being arranged prior to the application being presented to Committee for a decision, to ensure Members have the opportunity to view the site and understand its topography and how it relates to its surroundings.

8 Recommendation

8.1 That Members agree for officers to arrange a site visit prior to this application being presented to Planning Committee for a decision.

8.2 There is no recommendation for a decision to be made at this stage in the consideration of the application. Consequently, it is recommended that the Committee notes the report, and is invited to make general comments with regards to the material planning issues raised by the application.

9 Appendix 1: Consultation Responses

9.1 Active Travel England (March 2026): [Comment received]

Following a high-level review of the above planning consultation, Active Travel England has determined that standing advice should be issued and would encourage the local planning authority to consider this as part of its assessment of the application. Our standing advice can be found here: <https://www.gov.uk/government/publications/active-travel-england-sustainabledevelopment-advice-notes>

9.2 Affinity Water (March 2026): [Comment received]

You should be aware that the proposed development site is located within an Environment Agency defined groundwater Source Protection Zone 1 (SPZ1) which corresponds to our abstraction boreholes (CHOR) for public water supply.

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, no works involving excavations (e.g. for foundations (e.g. piling), drainage (e.g. infiltration), geothermal system etc.) 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. Infiltration methods, particularly deep bore soakaways, within SPZ1 should be avoided, but if proposed should be accompanied by a risk assessment on the potential impact to the abstraction point, and an appropriate number and type of treatment stages proposed to mitigate the risk. If we are not satisfied with the submissions, we will withhold our condition discharge recommendation.

Condition 3

Prior to the commencement of development, 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.

Informative

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. It should be noted that the construction works may exacerbate any existing pollution. If any pollution is found at the site then the appropriate monitoring and remediation methods will need to be undertaken. For further information we refer you to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".

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. 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.

9.3 Chorleywood Parish Council (received 17 March 2026): [Objection]

Below are the Parishes initial comments on the application pending a full assessment by the Committee at its Extraordinary Planning Committee on 25th March.

The Committee had Objections to this application on the following grounds and wish to CALL IN, unless the Officers are minded to refuse.

Green Belt

The site is in the Green Belt. The Three Rivers Stage 4 Green Belt Review makes clear that this site is not grey belt and is an area of fundamental importance to the wider Green Belt. As such, this site is protected by NPPF Paragraph 11 b) i). It should be noted that, despite the developers contention that Chorleywood is a village, the settlement is categorised as a town under the Settlement Hierarchy and Green Belt Policies agreed by TRDC and this is supported by ONS and Government analysis.

Travel & Transport

The proposed site is not sustainable from a travel and transport perspective for the following reasons:

Access to the site is via two single track lanes (Shepherds Lane and Berry Lane), both of which have very narrow elements that often struggle with existing traffic. Neither of these roads have pedestrian pavements and, through the narrow sections, do not provide sufficient width for a vehicle to pass a pedestrian or cyclist whilst providing the space required by the Highway Code.

Shepherds Lane is to be designated as a Quiet Lane under the Local Cycling and Walking Infrastructure Plan, which would make increasing vehicular traffic using this route incompatible with that Plan.

The site is a 23-minute walk from the local shopping area, health facilities and station; well outside the desired requirement for new sites to accord to the principles of 20-minute neighbourhoods. This is exacerbated by the fact that all routes of less than a 40-minute walk require the use of narrow unlit single-track lanes, of the nature described above, for the vast majority of the journey.

If, as is likely, residents of the site were to drive to the local facilities, they would find that there is limited parking that is already fully utilised. This is likely to be worsened if part of the Chorleywood Station car park is developed (this is already a site in the new Local Plan).

The site includes a public right of way (Chorleywood 30) which runs from The Queens Drive to Berry Lane, and it will be vital that this right of way is protected, including providing space around it in line with the policies of the new Local Plan.

A full Transport Assessment has been commissioned and will be provided in due course.

Ecology

There are several Tree Protections Orders (TPOs) across the site:

to the south of the site bounding Shepherds Lane there are 11 individual tree TPOs, along the driveway to the main farm complex, there is a group of trees (5 Oak, 5 Ash and 1 Wild Cherry) covered by a Group TPO

towards the north of the site there is an area TPO.

Development of the site is likely to have a negative impact on these trees. It should be noted that parts of the woodland adjacent to the site is classified as ancient woodland and this would need protecting.

Red-listed species of birds protected under the Wildlife and Countryside Act 1981 have been recorded in the vicinity and are likely to be breeding on it. Development of the site is

very likely to have a significant negative impact on them and could result in the removal of a badly needed nesting site.

Human Environment

Proximity to the M25 is likely to result in negative impacts on residents from noise and potentially poor air quality. Mitigations to these would be likely to be required to be provided. There are reports of historic asbestos contamination of the site which need to be fully investigated and potentially addressed before any development could take place. There have also been unconfirmed reports of unlicensed waste disposal at the site, which would need investigating in case this caused further contamination of the site.

Sewage and Wastewater

It is assumed that sewage from this site would be processed at the Maple Cross Sewage Treatment Works. Thames Water have confirmed that these works are at full capacity and are unable to manage the additional sewage and foul water.

Historic Environment

The site is close to, but not in, the Chorleywood Common Conservation area. Whilst the site itself contains no Listed Assets, a full assessment by Conservation Officers is required to consider the impact on Listed Assets in the vicinity of the site and the Conservation Area. There are also views from the Common of the site that need considering in the Conservation Officers assessment.

9.3.1 Chorleywood Parish Council (received 7 April 2026): [Objection]

The Committee had Objections to this application and wish to CALL IN, unless the Officers are minded to refuse.

Should the plans or supporting information be amended by the Applicant, please advise the Parish Council so the comments can be updated to reflect the amended.

The objection is based on the following:

Green Belt

The site of the development is in the London Metropolitan Green Belt.

Paragraph 143 of the National Planning Policy Framework states that:

“Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”*

The Three Rivers Stage 4 Green Belt Review, developed as part of the new Local Plan process and approved by the TRDC Full Council on 27th January, makes clear that this site is not grey belt as it makes a strong contribution of Purpose a) and a relatively significant impact to Purpose b). As such the land cannot be considered grey belt as defined under the Planning Practice Guidance for Green Belt.

Paragraph 155 of the National Planning Policy Framework states 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 below.*"

The proposals fail to meet these criteria in that:

- As described above, the site is not grey belt.
- The Three Rivers Stage 4 Green Belt Review identifies the area containing the site as an area of fundamental importance to the wider Green Belt due to its *"contribution to purpose (b), preventing the neighbouring towns of Rickmansworth and Chorleywood from merging. This area of Green Belt may be deemed of fundamental importance to the wider Green Belt as it prevents the physical and perceptual merging of these towns. The gap between Rickmansworth and Chorleywood is relatively small compared to gaps between other towns in the context of the Three Rivers Green Belt."* As such, significant development within this area must be considered to fundamentally undermine the wider Green Belt across the area of the plan.
- As covered in Travel and Transport below, the proposed development is not in a sustainable location.

The applicant contends that Chorleywood is a village rather than a town, however, this is not in accordance with multiple authoritative sources:

1. Prior to the creation to Three Rivers District Council in 1974, Chorleywood's local government was provided by Chorleywood Urban District Council. The inclusion of the term "urban" gives clear guidance that Chorleywood was considered to be a town (English Oxford Dictionary; definition of "urban" – "Of, pertaining to, or constituting a city or town).
2. The House of Commons Library research briefing "City & Town Classification of Constituencies & Local Authorities (2018)" classifies Chorleywood as a "Small Town".
3. The Office of National Statistics, in its series of papers on "Understanding Towns in England and Wales", defines a small town as a built-up area having a population of between 5,000 and 20,000. According to the 2021 Census, Chorleywood has a population of 11,710 – well within the parameters set for a Small Town.
4. The Three Rivers Settlement Hierarchy, October 2025, makes clear that Chorleywood is a "Small Town".
5. Stage 4 Green Belt Review, September 2025, lists Chorleywood as a "large built-up area" for Green Belt Purpose a) and a "town" for Green Belt Purpose b).

Like many places which had been villages in the past, residents of Chorleywood do, at times, refer to it as a village. This harking back to more pastoral times and feelings, has no relevance to real analysis and is very common. For example, many residents of Pinner in the London Borough of Harrow, still refer to it as being Pinner Village – to the extent that the Pinner Association's regular magazine is still called The Villager. Nobody would truly consider Pinner a village for any demographic, statistical or planning reason just because of this colloquialism.

The applicant, in their Green Belt Technical Note, refers to the fact that the Chorleywood Neighbourhood Development Plan (NDP), adopted in May 2021, uses the term "village" at times to refer to Chorleywood. However, this ignores the fact that, at that time, the term "village" had no real impact or meaning for planning matters and simply indicates the form of colloquialism referred to above. In April 2025, the Parish Council commenced its required five-year review of the plan. As part of this review, it was identified that the language of the National Planning Policy Framework and Planning Practice Guidance had changed to make the term "village" a practical reference in planning and so the Working Group reviewed whether this language was still appropriate. Referring to the authoritative resources described earlier, it was decided to recommend to the Full Parish Council that, as part of the review, the terminology of the NDP be amended to avoid any confusion by removing the word "village" where it was no longer appropriate. This was approved by the Full Council on 7th October and has subsequently been forwarded to Three Rivers District Council to gain approval to make the changes as a minor amendment.

Having identified that the proposed development is inappropriate development in the Green Belt, we must turn to NPPF paragraph 153 which states that “Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. ‘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.”

As the relevant site is considered to be in an area of fundamental importance to the wider Green Belt (Stage 4 Green Belt Review), the level of benefit would have to be truly significant. Whilst the development will provide new housing for the area, the new Local Plan is currently expected to provide at least 85% of the identified housing need as calculated using the standard methodology. As such the shortfall against the identified housing need is not of such level that would justify building in such a sensitive element of the Green Belt when other sites in less sensitive areas may well come forward to bridge the shortfall. Many of the other benefits stated by the applicant as being delivered by the development are only required due to the development itself. Of those that do relate to the currently existing settlements, these can easily be delivered in other, less sensitive sites.

Travel & Transport

The proposed site is not considered to be sustainable from a travel and transport perspective for the following reasons:

- Access to the site is via two single track lanes (Shepherds Lane and Berry Lane), both of which have very narrow elements that often struggle with existing traffic. Neither of these roads have pedestrian pavements and, through the narrow sections, do not provide sufficient width for a vehicle to pass a pedestrian or cyclist whilst providing the space required by the Highway Code.
- Shepherds Lane is to be designated as a Quiet Lane under the Local Cycling and Walking Infrastructure Plan, which would make increasing vehicular traffic using this route incompatible with that Plan.
- The site is a 23-minute walk from the local shopping area, health facilities and station; well outside the desired requirement for new sites to accord to the principles of 20-minute neighbourhoods. This is exacerbated by the fact that all routes of less than a 40-minute walk require the use of narrow unlit single-track lanes, of the nature described above, for the vast majority of the journey.
- If, as is likely, residents of the site were to drive to the local facilities, they would find that there is limited parking that is already fully utilised. This is likely to be worsened if part of the Chorleywood Station car park is developed (this is already a site in the new Local Plan).
- The site includes a public right of way (Chorleywood 30) which runs from The Queens Drive to Berry Lane, and it will be vital that this right of way is protected, including providing space around it in line with the policies of the new Local Plan.
- Berry Lane already regularly gridlocks whenever there are delays on the M25
- School pupils from Berry Lane going to St Clement Danes are reported to already qualify for free school transport due to concerns over pupils walking or cycling along Berry Lane, Stag Lane and Common Gate Road.

It should be noted that the plans appear to show only one entrance / exit from the site with no alternative access way for emergency vehicles.

It appears that it is proposed to divert the R1 & R2 bus routes to use Shepherds Lane and Stag Lane instead of Long Lane. Due to their size, the buses on Long Lane regularly cause significant delays in the Lane, including preventing an ambulance on blue lights being able to travel south-east down Long Lane. As both Shepherds Lane and Stag Lane are narrower than Long Lane for much of their length, with smaller passing spaces, the proposed diversion is likely to cause significant traffic issues in the area.

A full Travel and Transport Assessment has been commissioned and will be submitted in due course.

Ecology

There are several Tree Protections Orders (TPOs) across the site:

- to the south of the site bounding Shepherds Lane there are 11 individual tree TPOs,
- along the driveway to the main farm complex, there is a group of trees (5 Oak, 5 Ash and 1 Wild Cherry) covered by a Group TPO
- towards the north of the site there is an area TPO.
-

Development of the site is likely to have a negative impact on these trees. It should be noted that parts of the woodland adjacent to the site is classified as ancient woodland and this would need protecting.

Red-listed species of birds protected under the Wildlife and Countryside Act 1981 have been recorded in the vicinity and are likely to be breeding on it. This includes Skylark, Mistle Thrush, Starling, Greenfinch and Linnet. Development of the site is very likely to have a significant negative impact on them and could result in the removal of a badly needed nesting site. It is also likely that House and Tree Sparrows, both red-listed species are present on the site as they have been observed in nearby fields.

According to the applicant's Ecology report, 10 bat species have been recorded on the site. One of the species recorded, the Barbastelle bat, has a conservation status of Vulnerable and is protected in the UK under the Wildlife and Countryside Act, 1981. The presence of the Barbastelle bat has recently been considered of sufficient concern that the major Norwich Western Link Road project was withdrawn.

From the applicant's Ecology report, it appears that no survey of wild plant and insect species, including butterflies, has been undertaken and this should be completed before decision making is undertaken.

Human Environment

Noise experienced at the site from the M25 can be substantial due to the raised nature of the bridges over Shepherds Lane and Berry Lane. The acoustic report suggests that residents will need to be provided with mechanical ventilation so that they can keep their windows closed for the majority of the time (*"Openable windows will not be suitable as the primary means of ventilation but may be desirable as an available option for residents and for purge ventilation and in some locations for overheating mitigation."*).

Whilst the air quality report suggests that harm from air pollution will "not be significant" the model shows that there is poor air quality next to the M25 on the edge of the site. There is growing evidence of the harm to health and well-being from living close to motorways. Even if risks can be mitigated by providing mechanical ventilation to homes this is not an ideal site for housing from a sound pollution and an air pollution perspective.

There are reports of historic asbestos contamination of the site which need to be fully investigated and potentially addressed before any development could take place. There have also been unconfirmed reports of unlicensed waste disposal at the site, which would need investigating in case this caused further contamination of the site.

Thorough soil analysis of the site should be undertaken to confirm whether there is any contamination of the site.

Sewage and Wastewater

Presently the site has only one residential building, so there is no problem with the disposal of wastewater and sewerage from the site. The surface water flood risk is very low (Source: Check your long-term flood risk-GOV.UK). The risk to the site and surrounding area is

the possibility of large volumes of run-off water due to hard landscaping, such as roads, driveways and buildings. The site slopes downhill towards the M25 and along Shepherds Lane. On-site drainage could cope with some of the run-off but, as we have seen over many years, Chorleywood has suffered with floods due to its topography. Further along Shepherds Lane there is another parcel of land that has been put forward for development. This is also for a large number of houses (500+) which will add to the pressure of drainage. The two sites are no more than 100m apart.

Berry Lane already experiences flooding at low points due to run off from this site in combination with other sources, and appropriate mitigation measures should be provided for this.

The nearest wastewater and sewerage treatment facility is Thames Water's Maple Lodge treatment centre at Maple Cross Herts. This is the fifth largest of Thames Water's treatment centres. Unfortunately, this processing plant is operating at full capacity. It was built in the 1950s and 1960s for a much smaller community. A newspaper article about Maple Lodge was published by The Guardian on the 24th February 2026, reporter, Nils Pratley. In it he outlines the problems with over capacity, lack of investment and debt accumulation due to heavy fines imposed on Thames Water. As an example, Thames Water discharged sewerage and wastewater 124 times into the river Colne in 2024. Upstream, Chalfont St. Peter can suffer severe sewerage flooding caused by the slow treatment process. The present situation is bad enough, disastrous would be a better way to describe it. So how would our community and Thames Water cope with an extra 333 homes at Catlips Farm, the proposed 500+ housing estate further along Shepherds Lane, 675 new homes on East Green St. and 1500 new homes in Maple Cross?

In their submission to the LPA related to this application, Thames Water has identified that the existing foul water network does not have sufficient capacity to support the proposed development. As such, they request that the following condition be attached to any planning permission granted:

"The development shall not be occupied until confirmation is provided that either:

- 1. All necessary upgrades to the foul water network to accommodate additional flows from the development have been completed; or*
- 2. A phasing plan for development and infrastructure, agreed with Thames Water and the Local Planning Authority, is in place. Where such a plan exists, no occupation shall occur other than in accordance with the approved phasing schedule."*

Historic Environment

The site is close to, but not in, the Chorleywood Common Conservation area. Whilst the site itself contains no Listed Assets, a full assessment by Conservation Officers is required to consider the impact on Listed Assets in the vicinity of the site and the Conservation Area. There are also views from the Common of the site that need considering in the Conservation Officer's assessment.

Community / Social Facilities

It is proposed that the site will deliver a fully built and delivered Medical Centre with future proofing provision. Details of this will need to be secured by way of a s106 agreement. It is also proposed to deliver a 66-bed dementia care home.

It is proposed that the site will contain community facilities including a central hub with shop, café, community space and children's play area.

It should be noted that, possibly with the exception of the care home, there is no evidence that these facilities are currently required and are only required due to the proposed development of new housing.

The care home would be better developed closer to sustainable infrastructure to support the staff and visitors to the site.

The existing livery stables are a valued community asset which have enabled generations of local people to benefit from equine sports.

9.3.2 Chorleywood Parish Council (received 6 May 2026): [Objection]

A Transport Objection has been submitted by Railton TPC Ltd (dated April 2026). That document is not attached direct to this report but is available to view online via <https://www3.threerivers.gov.uk/online-applications/applicationDetails.do?activeTab=documents&keyVal=TA789AQFJW300> and has been taken into account.

It summarises that there are no safe pedestrian routes between the site and Chorleywood, with pedestrians expected to use narrow sections of road with no footway, unlit, bounded by hedgerows. The footpath routes are narrow, steep and lack surveillance. Cycle access toward Chorleywood is poor. Shepherds Lane is unsuitable for services, for example two busses cannot pass, and busses cannot pass light vehicles. Car generation has been underestimated.

9.4 Environment Agency (6 March 2026): [No objections]

Thank you for consulting us on the above planning application on 24 February 2026. As part of the consultation we have reviewed the following submitted documents:

- Phase I Geo-Environmental Risk Assessment, prepared by Roberts, dated July 2025 (ref.: 250511.P1.02);
- Flood Risk Assessment & Sustainable Drainage Strategy, prepared by Fernbrook, dated February 2026 (ref.: 23200-FCE-XX-XX-RP-D-0002).

Environment Agency Position

Considering the information provided, we have no objection to the proposed development given the inclusion of the following conditions on any grant of decision notice. Without these conditions we would object to the proposal in line with paragraph 187 of the National Planning Policy Framework because it cannot be guaranteed that the development will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

The proposed development site's former use as a farm means it could potentially contain sources of contamination. Potential contaminants could be mobilised and impact on controlled waters, specifically groundwater in the underlying Beaconsfield Gravel Secondary A aquifer and the deeper Chalk Principal aquifer, as a result of the proposed redevelopment of the site. The site is located within an Inner Source Protection Zone (SPZ1) associated with an Affinity Water public water abstraction approximately 1.5km south of the site (Mill End).

We note in the submitted Phase I Geo-Environmental Risk Assessment by Roberts, ref.: 250511.P1.02) that there is a historic landfill beneath the site – we have no record of this and would be interested in further detail through intrusive investigation. If there is indeed landfill material beneath the site, infiltration drainage through this infilled material is unlikely to be acceptable here. As such, we do not believe the drainage strategy presented within the submitted Flood Risk Assessment & Sustainable Drainage Strategy Fernbrook (ref.: 23200-FCE-XX-XX-RP-D-0002) has considered this possibility and is therefore potentially invalid.

We also note that there has been some informal waste and chemical storage at the site. It is therefore possible that there could be hotspots of contaminants throughout the site that

will need delineating given the sensitivity of the site. Also, we have not been made aware of the proposed foundation methods and as such cannot rule out piled foundations, which could open preferential pathways for the ingress of said contaminants into sensitive groundwater receptors.

Condition 1 – Remediation Strategy

No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the LPA. This strategy will include the following components:

1. an up-to-date Preliminary Risk Assessment (PRA) and conceptual model following the results of an exploratory investigation;
2. a detailed site investigation scheme, based on the results from (1) to provide information for a detailed risk assessment to all receptors that may be affected, including those off-site;
3. a tiered risk assessment using the results of the site investigation referred to in (2);
4. an options appraisal including sustainability and treatability studies of the remediation measures required and how they are to be undertaken.
5. a remediation strategy and verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete and identifying any requirements for longer-term monitoring of pollutant linkages, mitigation, maintenance and arrangements for contingency action

Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.

Reasons

To ensure that the development does not contribute to, and is not put at, unacceptable risk from adversely affected unacceptable levels of water pollution in line with paragraph 187 of the National Planning Policy Framework. To ensure the development will contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate in line with paragraph 187 of the National Planning Policy Framework. To prevent deterioration of a water quality element to a lower status class in the Mid-Chilterns Chalk groundwater waterbody under the Water Framework Directive.

Advice

The submitted Phase I Geo-Environmental Risk Assessment by Roberts, ref.: 250511.P1.02) will satisfy (1). An intrusive investigation to further assess the extent and nature of the potential landfill material and to delineate potential contamination associated with the chemical/waste storage should be undertaken in order to satisfy (2) and enable (3)-(5) if necessary.

We recommend that developers should:

- follow the risk management framework provided in Land Contamination: Risk Management, when dealing with land affected by contamination;
- refer to our Guiding principles for land contamination for the type of information that we require in order to assess risks to controlled waters from the site - the local authority can advise on risk to other receptors, such as human health;
- consider using the National Quality Mark Scheme for Land Contamination Management, which involves the use of competent persons to ensure that land contamination risks are appropriately managed;
- refer to the contaminated land pages on gov.uk for more information.

Condition 2 – Previously Unidentified Contamination

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the LPA) shall be carried out until further investigation and a remediation strategy detailing how this

contamination will be dealt with has been submitted to, and approved in writing by, the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason

To ensure that the development does not contribute to and is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site. This is in line with paragraph 187 of the National Planning Policy Framework.

Condition 3 – Long-term Monitoring

The development hereby permitted may not commence until such time as a detailed scheme for groundwater monitoring in respect of contamination has been submitted to, and approved in writing by, the Local Planning Authority. The scheme shall, where necessary, be supported by:

- detailed sampling and analytical schedules;
- a programme for future maintenance and decommissioning;
- a schedule for submission of interim and final monitoring reports;
- a contingency action plan including the list of potential mitigation measures that will be implemented, should unexpectedly changes in groundwater quality be noted as a result of decommissioning or redevelopment works.

The scheme shall be fully implemented and subsequently maintained, in accordance with the timing/phasing arrangements embodied within the scheme, or any details as may subsequently be agreed, in writing, by the Local Planning Authority.

Reason

To ensure that the site does not pose any further risk to the water environment by managing any ongoing contamination issues and completing all necessary long term remediation measures. This is in line with paragraph 187 of the National Planning Policy Framework.

Condition 4 – Investigative Boreholes

The development hereby permitted may not commence until such time as a scheme for managing any borehole installed for the investigation of soils, groundwater or geotechnical purposes shall be submitted to and approved in writing by the LPA. The scheme shall provide details of how redundant boreholes are to be decommissioned and how any boreholes that need to be retained, post development, for monitoring purposes will be secured, protected and inspected.

The scheme shall be fully implemented and subsequently maintained, in accordance with the scheme, or any changes as may subsequently be agreed, in writing, by the Local Planning Authority.

The scheme will need to include the following:

- Decommissioning Plan to include intended programme/schedule of works and detailed method statement;
- Borehole Retention Plan to include location, security, and protection measures
- Verification report for the decommissioned boreholes to include records of:
 - o the reason for abandonment;
 - o groundwater level prior to decommissioning;
 - o any removal of casing or attempts to remove the casing;
 - o the depth, position, and nature of backfill materials;
 - o problems encountered during decommissioning.

Reason

To ensure that redundant boreholes are safe and secure, and do not cause groundwater pollution in line with paragraph 187 of the National Planning Policy Framework.

Advice

Redundant boreholes that are not intended for monitoring should be decommissioned as soon as practicable as to not act as pathways for contaminants – either already present or associated with the construction phase – to migrate to sensitive groundwater receptors themselves.

The decommissioning of boreholes at the site should be undertaken in line with the guidance presented in Good practice for decommissioning redundant boreholes and wells (Environment Agency, 2006) available at the following website: https://webarchive.nationalarchives.gov.uk/ukgwa/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6478_8cbe6f.pdf

You should keep an accurate record of the abandonment details for future reference, including:

- the reasons for abandonment (for example water quality problems);
- measurement of groundwater level prior to backfilling;
- the depth and position of each layer of backfilling and sealing materials;
- the type and quantity of backfilling and sealing materials used;
- any changes made to the borehole/well during the abandonment (for example casing removal);
- any problems encountered during the abandonment procedure.

The location of abandoned borehole and wells should be clearly marked on site records. This is essential where any part of the well has not been filled. It is also good practice to mark or deeply inscribe well caps; even if done crudely it can avoid considerable risk, delay, or uncertainty in the event of the structure being discovered during excavation by others in the future who may not otherwise know what the feature is. Always notify the Environment Agency and British Geological Survey of the abandoned well location and structure.

Condition 5 – Verification Report

Prior to any part of the permitted development being occupied, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the Local Planning Authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.

Reason

To ensure that the site does not pose any further risk to the water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 187 of the National Planning Policy Framework.

Condition 6 – Piling Scheme to be Agreed

The piling/deep foundation design using penetrative methods hereby permitted by the Local Planning Authority may not commence until such time as a scheme has been submitted to, and approved in writing by, the Local Planning Authority.

The scheme shall be based on the information submitted as part of the application and, where necessary, supported by:

- a Foundation Works Risk Assessment;
- a conceptual site model;
- specification of the type, number, and depth of proposed piles;
- a detailed groundwater monitoring programme including a schedule for submission of interim and final monitoring reports;
- a contingency action plan including the list of potential mitigation measures that will be implemented should unexpected changes in groundwater quality be noted as a result of decommissioning piling works;
- timing/phasing arrangements.

The scheme shall be fully implemented and subsequently maintained, in accordance with the timing/phasing arrangements contained in the scheme, or any details as may subsequently be agreed, in writing, by the Local Planning Authority.

Reason

To ensure that the proposed development does not harm groundwater resources in line with paragraph 187 of the National Planning Policy Framework and the Environment Agency's approach to groundwater protection.

Advice

We have not been made aware of the confirmed proposed foundation method. Piling has the potential to create preferential pathways, aiding the vertical migration of contaminants towards sensitive groundwater aquifers. Please refer to Piling and Penetrative Ground Improvement Methods on Land Affected by Contamination: Guidance on Pollution Prevention.

We consider it prudent to include geotechnical investigation within the scope of any further intrusive ground investigation in order to inform foundation design. Continuous Flight Auger (CFA) piling is our preferred piling method, if piling is indeed deemed necessary. If the proposed strata for piles to terminate in is a Principal aquifer, we strongly recommend exploring the feasibility of shallower foundations as much as possible.

If penetrative techniques are indeed to be used during the construction of this development, information to address these issues will need to be included as part of a risk assessment and should consider the following:

- identification of relevant receptors and baseline monitoring;
- determination of contaminants of concern and establishment of trigger values;
- a monitoring strategy to be implemented during and after piling;
- mitigation measures to be implemented should the agreed trigger values be breached.

Within SPZ1, due to the close proximity of potable abstractions, we recommend that weekly monitoring for in-situ groundwater quality parameters, including conductivity and turbidity, should be incorporated into the groundwater monitoring plan as these provide valuable on-site data that can enable rapid decision making with respect to mitigations if required. Monitoring wells installed to support a piling risk assessment should be installed to at least 5m deeper than the deepest piled foundation toe depth to capture any impacts from the proposed groundworks during and post construction.

Condition 7 – Drainage Scheme to be Agreed

The development hereby permitted may not commence until such time as an updated surface water drainage scheme has been submitted to, and approved in writing by, the local planning authority. The scheme shall be implemented as approved.

Reason

To ensure that the proposed method of managing surface water drainage does not harm groundwater resources in line with paragraph 187 of the National Planning Policy Framework.

Advice

Given the uncertainty of the nature of the ground beneath the site as there is potential for landfill waste material, shallow infiltration as proposed in the submitted Flood Risk Assessment & Sustainable Drainage Strategy Fernbrook (ref.: 23200- FCE-XX-XX-RP-D-0002) is unlikely to be acceptable from a groundwater quality perspective. However, the landfill material may turn out to not be widespread, so the outlined scheme may be acceptable, but currently the level of investigation required to confirm this has not yet been

carried out; we consider it prudent to hold off in redesigning the drainage strategy until the ground conditions have been confirmed.

We will likely object to the use of deep borehole soakaways without reasonable justification, in line with Position Statement G1 in the Environment Agency's approach to groundwater protection. Please refer to the other position statements in Section G of this document when designing the drainage plan, should it require redesigning.

Advice to Developer Waste

Contaminated soil that is (or must be) disposed of is waste, therefore its handling, transport, treatment, and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991;
- Hazardous Waste (England and Wales) Regulations 2005;
- Environmental Permitting (England and Wales) Regulations 2016;
- The Waste (England and Wales) Regulations 2011.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12-month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on gov.uk for more information.

Additionally, the CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2), often referred to as "DoW:CoP", provides operators with a framework for determining whether or not excavated material arising from site during land development or remediation is waste or has ceased to be waste. Under the Code of Practice:

- excavated materials can be reused on-site as part of the development, as a planned activity, providing they are fit for purpose and unlikely to cause pollution;
- excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution;
- treated materials can be transferred between sites as part of a hub and cluster project;
- some naturally occurring clean material can be transferred directly between sites.

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically. Refer to the Waste Classification Technical Guidance. and the waste suitability page on gov.uk for information about what each type of waste comprises and what it can be used for.

Permitting

The construction of this project may be subject to a number of activities regulated through Environmental Permits (EPR), including (but not limited to):

- dewatering;
- Deposit for Recovery (DfR);
- Flood Risk Activity Permit (FRAP);
- use of drilling fluids;
- abstraction license;
- surface and groundwater discharge consent(s).

We recommend contacting the National Permitting Service for permitting matters and any issues likely to be raised as early as possible as the processing times vary depending on the type of permit, and can be long in some cases.

Advice to Local Authority

The proposed drainage strategy as outlined in the submitted Flood Risk Assessment & Sustainable Drainage Strategy Fernbrook (ref.: 23200-FCE-XX-XXRP-D-0002) is deemed acceptable as long as the ground conditions prove to be conducive. There is ambiguity over the presence of landfill material beneath the site which would make the infiltration drainage features as presented not acceptable within an SPZ1. As such, Condition 7 is a precaution and can be discharged upon confirmation of clean ground – we request to be consulted on this matter as and when we are consulted on part (2) of our Condition 1 (post-intrusive investigation) as they will be in sync.

9.5 Hertfordshire County Council – Archaeology (16 March 2026): [No objections]

We welcome the Archaeological Desk-Based Assessment submitted in support of the application. The development site, at c.34.5 ha., is a very large size. The only archaeological or historic interest relating to the site recorded on the Hertfordshire Historic Environment Record [HER] is the possible ridge and furrow in the southern area of the site. It should be noted that very few archaeological investigations have been carried out in the area, and that the closest, carried out in 2009 during the widening of the M25, revealed Neolithic pottery [HER no. 1865], Iron Age features including pits, ditches, possible enclosure and field boundary [HER no. 31459], and late Iron Age and early Roman features including a pit containing hearth debris [HER no. 31460]. A number of findspots of prehistoric date have also been identified as residual finds in the wider vicinity of the site.

The site is also in a topographically suitable location for settlement, particularly that of prehistoric and Roman date. Cartographic evidence indicates that in the later postmedieval period it was open land, save for the buildings that make up Catlips Farm, as it remains today. This lack of significant disturbance in recent centuries means that it may retain significant archaeological potential.

Therefore, in line with our pre-application advice, I believe that the proposed development should be regarded as having the potential to have an impact on heritage assets of archaeological interest, and I recommend that the following provisions be made, should you be minded to grant consent:

1. A geophysical survey of the development area, prior to any development commencing;
2. the archaeological field evaluation of the proposed development area, via trial trenching, prior to development commencing;
3. such appropriate mitigation measures indicated as necessary by that evaluation.

These may include:

- a. the preservation of any remains in situ, if warranted,
 - b. appropriate archaeological excavation of any remains before any development commences on the site, with provisions for subsequent analysis and publication of results,
 - c. archaeological monitoring of the groundworks of the development (also including a contingency for the preservation or further investigation of any remains then encountered),
 - d. such other provisions as may be necessary to protect the archaeological interests of the site;
4. the analysis of the results of the archaeological work with provision for the subsequent production of a report and an archive, and the publication of the results;
 5. 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 the policies included within Policy 16 (para. 218, etc.) of the National Planning Policy Framework, and relevant guidance

contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015).

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 and methodology of site investigation and recording as required by the evaluation
3. The programme for post investigation assessment
4. Provision to be made for analysis of the site investigation and recording
5. Provision to be made for publication and dissemination of the analysis and records of the site investigation
6. Provision to be made for archive deposition of the analysis and records of the site investigation
7. 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 to provide information on professionally accredited archaeological contractors who may be able to carry out the necessary work.

9.6 Hertfordshire County Council – Adult Care Services (19 March 2026): [Comment received]

It is our understanding that the site is being proposed for a 66-bed residential care home. The Care Home Statement indicates that the home may provide both residential and dementia care, depending on demand. While the county council is supportive of additional dementia care provision, without a planning condition securing the specific type of care, there would be no mechanism to prevent the operator from delivering solely residential care. Our assessment of need, as set out below, shows that there is already a surplus of residential care beds within Three Rivers.

Policy Position

The county council's current policy for older people's housing is to seek the provision of Housing with care at 65 units per 1,000 head of population aged over 75, Nursing Care at 45 units per 1,000 head of population aged over 75 and Residential Care at 20 per 1,000 head of population aged over 75.

These figures reflect the county council's policy to support a general increased provision of specialist housing. This also echoes the national government position which seeks to emphasise the key importance of the provision of housing for older people, as well as the findings of the Older Persons Housing Taskforce.

A report published on the 26 November 2024 by The Older Persons Housing Taskforce stresses the need for age-friendly and dementia friendly housing to be built to ensure that older people can live with dignity, independence, and wellbeing in their later years.

- The county council seek to reduce the reliance on residential care in most instances with a strategy of reducing this provision and steering it towards housing with care which is suitable for both low, medium and high levels of care. This type of housing ensures that the most appropriate and enabling environment is provided, allowing residents to stay within their own homes throughout their lifetime, including those who develop dementia, whilst also allowing general needs housing to be released back into the market. As such, the county council are particularly supportive of additional provision of this type where there is an established need for it and where it accords with the definition set out in the Planning Practice Guidance:

Extra care housing or housing-with-care: This usually consists of purpose built or adapted flats or bungalows with a medium to high level of care available if required, through an onsite care agency registered through the Care Quality Commission (CQC). Residents are able to live independently with 24 hour access to support services and staff if required, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

- The county council are also supportive of the provision of very specialist accommodation such as nursing and dementia care.

Need

The county council have undertaken an assessment of need for all types of accommodation in each local authority and based on an expected population growth in Three Rivers in those aged over 75 of 21,308 people by 2042, have identified a future need of 857 units of housing with care (188 to be affordable), 284 nursing care beds and a surplus of 202 residential care beds. On this basis alone, the county council would support either housing with care or nursing care at this development, however these figures are dependent on the delivery of other similar schemes that may come forward sooner.

While this provides a mathematical assessment of need based on certain assumptions other real-world evidence such as vacancy rates, waiting lists and rate of sales/lettings can also indicate demand (or lack of) for specialist housing for older people and should be a consideration for the council. Equally, a mathematical surplus does not suggest that the existing provision should be automatically reduced. Evidence of vacancy rates and sales/letting rates may often be a sign of the age and/or quality of accommodation and should be a consideration for the council.

Other Considerations

- To ensure that specialist housing schemes meet the definitions set out within the PPG, particularly in relation to on-site care and support, the county council would encourage the LPA to secure provision through an appropriate planning obligation or condition. The county council have drafted template S106 wording for housing with care for this purpose.
- The county council would encourage the LPA to ensure that any provision of specialist accommodation includes an element of affordable housing or offsite contribution. With any off-site contribution to be used towards alternative affordable specialist housing schemes.
- Ensure that any fees are transparent and given to prospective residents upfront and that any service charges are reasonable and capped.
- The county council look more favourably on accommodation in sustainable locations and those that provide a range of facilities on site. It should have access (ideally within 500m) to public transport links and community facilities such as a GP surgery and shops. It would also benefit from providing a range of social and communal facilities, to ensure delivery of a high standard of accommodation. A full list of facilities and recommendations can be found in the county council's Service Provision and Placemaking Guide.

- To ensure, wherever possible, that communities are suitable for a range of ages, larger strategic developments should seek to include an element of specialist housing for older people. The county council would also encourage a range of typologies, built form and tenures at a more local level and would broadly support any diversification of supply particularly where there is an identified need and where very specialist accommodation is included.
- The council should encourage the redeployment of any surplus stock to other tenures or levels of care in the first instance.
- The county council would also encourage the council to seek as much development to be built to M4(2) standards as possible, as well as seeking an element of M4(3), to ensure accommodation is better equipped to respond to changing needs. Although it is recognised that the provision of both affordable housing and M4(2)/M4(3) compliance have ramifications to a site's viability.

9.7 Hertfordshire County Council – Growth and Infrastructure (19 March 2026): [No Objection]

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 333 dwellings we would seek financial contributions towards the following projects:

HOUSES			FLATS		
Number of Bedrooms	A) Open Market & Shared Ownership	B) Affordable Rent	Number of Bedrooms	A) Open Market & Shared Ownership	B) Affordable Rent
1	0	0	1	0	0
2	22	22	2	6	15
3	133	77	3	0	0
4+	54	4	4+	0	0
Total	209	103	Total	6	15

Primary Education Contribution towards the possible new two form entry (2fe) primary school on land to East of Green Street site in Chorleywood and/or provision serving the development (£6,011,658 (which includes land costs of £82,482) index linked to BCIS 1Q2024 and BCIS Regional Factor)

Secondary Education Contribution towards the (4fe) expansion of The Reach Free School and/or provision serving the development (£4,498,255 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 (£622,107 index linked to BCIS 1Q2024 and BCIS Regional Factor)

Waste Service Transfer Station Contribution towards the increasing capacity at Waterdale Transfer station and/or provision serving the development (£41,252 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 ONLY: 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.

9.8 Hertfordshire County Council – Highway Authority (24 February 2026): [Objection]

Recommendation

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:

Compliance with local policy (LTP4);
Road Access; and
Traffic Generation.

The Highway Authority note the submission of materials in support of the planning application, including a Transport Assessment (TA), dated February 2026 and furthermore, post submission, an Addendum Highway Note, dated March 2026.

The Highway Authority wishes to acknowledge the pre-application discussions held with the applicant's transport consultant. The discussions were constructive in scope, and both parties put their respective views across, both in writing and in-person.

The Highway Authority has conducted a site visit to the development location, including an assessment of routes to and from both Chorleywood and Rickmansworth.

In preparing this response, the Highway Authority has considered the development site in accordance with the provisions of Hertfordshire County Council's document, Local Transport Plan 4 (LTP4)

The Highway Authority seeks to ensure that the development may be safely accommodated on the local highway network in terms of vehicular trip generation and by way of the proposed mitigation.

Of key importance is that all new development demonstrates to a robust extent that non-car modes of travel are viable options.

However, whilst the Highway Authority has a number of policies contained within the LTP4, Policy 1 provides an overarching framework for all other policies. Policy 1 is set out below:

Policy 1: Transport User Hierarchy

To support the creation of built environments that encourage greater and safer use of sustainable transport modes, the county council will in the design of any scheme and development of any transport strategy consider in the following order:

- Opportunities to reduce travel demand and the need to travel;
- Vulnerable road user needs (such as pedestrians and cyclists);
- Passenger transport user needs;
- Powered two-wheeler (mopeds and motorbikes) user needs; and
- Other motor vehicle user needs.

At the top of the hierarchy, the Highway Authority as a guiding principle seeks to ensure that all new development reduces the need to travel by way of good land-use planning and secondly, that viable alternatives are available other than the use of the private car. To this

end, the needs of pedestrians, cyclists and passenger transport users are placed higher than the private car.

The Highway Authority note that the proposed development site is located in between the settlements of Chorleywood and Rickmansworth. However, the development site is located closer to the local facilities, amenities and public transport available to Chorleywood village.

Whilst the “as the crow flies” distance to Chorleywood village centre is relatively short, the Highway Authority is concerned that the development site is situated in an area of semi-rural aspect. A walk from the centre of the development site to the village could be achieved within 20 minutes or so, there are significant concerns regarding the nature of routes available to the village. Whilst there are useful Rights of Way in the area, such as RoW 29 which offer attractive leisure routes into the village, the utilisation of Shepherd’s Lane or Berry Lane is still necessary. The Highway Authority’s principal concern is how these routes may be used on a day-to-day basis to access Chorleywood. To give an example, the Highway Authority has some doubts that commuters needing to access Chorleywood station would find the network particularly amenable at night-time. Personal safety of using the routes must also be considered at these times, particularly for young people. It is the view of the Highway Authority that these routes are fundamentally unsuitable to be utilised as principal access routes into Chorleywood. This notwithstanding, the Highway Authority notes the engagement with Hertfordshire’s Countryside, Rights of Way (CRoW) team in terms of seeking to provide new routes within the site and also upgrades to the existing network. Whilst the proposed works to the latter are indeed welcomed, the inherent constraints of the network in terms of the cross-sections (Definitive Width) available, the gaps in the network and the prevailing semi-rural environment are at odds with the applicant’s view that these could be made into viable walking routes to the village.

The Highway Authority note also the work contained within the Addendum Transport Note which seeks to enhance the walking routes to the adjoining centres. Appendix 2 presents these improvements at an indicative level. Whilst the works do provide some benefit in terms of ease of access for pedestrians, it is considered that these are too modest in scope to change the inherent difficulties of accessing the site from both the Chorleywood and Rickmansworth directions. Similarly, the attempt to show improvements to the ease of vehicular access on Shepherd’s Lane is highly localised and will do little to mitigate the wider access issues, in particular from the Chorleywood side.

The issues with accessing Chorleywood lead the Highway Authority to conclude that the site does not afford the requisite level of opportunity to access the village by sustainable modes.

The Highway Authority is also concerned that access for vehicles from the Chorleywood side of the development could lead to conflicts owing to the semi-rural nature of the sections of Shepherd’s Lane and Berry Lane west of the M25. These sections of roads are in effect country roads, ill suited for the demands of modern traffic and high volumes. The Highway Authority has a significant level of concern that for residents accessing the site from Chorleywood that the proposals for a large residential development could lead to conflicts between both motorised users and pedestrians. It is the view of the Highway Authority that road access to the site is fundamentally unsuitable given the inherent characteristics and geometry of the present network.

The Highway Authority note the materials contained within the Transport Assessment relating to the bus provision for the site. These are an accurate reflection of the discussions with the Highway Authority. The provision of the proposed bus services and attendant Section 106 funding is welcomed. However, whilst the bus could be a good option for longer journeys, given the potential wait times and proximity to the adjoining settlements and

difficulties with walking as set out within this response, the use of the private car is likely to be a more favourable option for short trips, particularly at night-time.

In terms of trip generation, a multi-modal trip generation exercise does not appear to be present within the TA text. However, the Highway Authority notes the presentation of census data within the Travel Plan. In terms of trip generation, the Highway Authority is concerned that the particular locational characteristics of this site may give rise to more trips by non-sustainable modes. This notwithstanding, the Highway Authority note the results of the highways related assessment work within the TA. In particular, the results of the highways capacity analysis at the Ebury and Maple Cross roundabouts is noted. Given the capacity constraints at these roundabouts, it is considered that there is a sufficiently material impact to warrant the examination of potential mitigation measures at these locations. The transport consultant, however, dismisses this impact in the TA report.

The TA concludes that the site is in a sustainable location, with the proposed mitigation measures seeking to confirm this assertion. Whilst the introduction of a bus service offers the most credible form of mitigation in the package, the Highway Authority has significant doubts whether the remaining mitigation proposed, namely the improvements to the Rights of Way network and basic localised highway improvements can satisfactorily contribute to a site that is sustainable in a fashion compliant with LTP4. Road access to the site is also significantly constrained from the Chorleywood direction, leading to doubts with respect to highways safety. In terms of junction capacity, no mitigation is proposed, with the impacts of the increased development traffic dismissed as not being material. The doubts with respect to the sustainability of the site also lead to concerns that a higher vehicular traffic generation may manifest itself for this development site.

In summary, the Highway Authority has been presented with a development proposal, that whilst to take purely distances to Chorleywood and Rickmansworth, both of which are settlements with good public transport, local facilities and amenities and are reasonably close, a development site of this nature would be expected to be readily linked. However, the inherent locational characteristics of this development site which present themselves as semi-rural, does not lend itself well to high volumes of pedestrian or vehicular trips seeking to access the development site from both centres, markedly so from Chorleywood. Whilst the mitigation package has some merit, it does not, or cannot satisfactorily advance the case for development at Catlips Farm, the Highway Authority recommends refusal of the planning application insofar that it does not principally comply with the provisions of the LTP4.

9.9 Hertfordshire County Council – Lead Local Flood Authority (17 April 2026): [No objections]

Thank you for your consultation on the above site, received on 17 February 2026. We have reviewed the application as submitted and wish to make the following comments. The applicant has provided a Flood Risk Assessment & Sustainable Drainage Strategy for the Outline Application stage, as listed in the Annex.

We understand the drainage strategy proposes that surface runoff will be managed with permeable paving, swales and infiltration basins across three catchments (north, central and south). The north catchment will attenuate flows before pumping to the central catchment for infiltration, the central and southern catchments infiltrate directly. The Medical Centre and Care Home drain to separate soakaways. Pump failure can be mitigated on site by twin duty-standby pumps and provision of 352 m³ of storage plus 690 mm freeboard. Clarification was provided that all basins and swales have a 1:3 side slope

We have no objection subject to conditions being attached to any consent if this application is approved, and the Applicant is in agreement with pre-commencement conditions. We suggest the following wording. If the following conditions are not included, the development would be contrary to NPPF and Three Rivers District Council Local Plan policy and we would object until such time that the details below are submitted for review. It is assumed

that the development will not be phased, however, if it is then a phasing condition will be required.

Condition 1:

Prior to or in conjunction with the submission of each reserved matters application, in accordance with the submitted FRA and Drainage Strategy (Flood Risk Assessment & Sustainable Drainage Strategy, by Fernbrook Consulting Engineers, April 2026, reference-23200-FCE-XX-XX-RP-D-0002 - revision number- P02), detailed designs of a surface water drainage scheme, prioritising the use of source control Sustainable Drainage Systems (SuDS) in consideration of the Non-Statutory Technical Standards for SuDS and 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

If infiltration is proven to be unfavourable (following the Environment Agency's conditions) 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). Surface water runoff shall not be discharged to the foul sewer, in line with the National SuDS Standards and the PPG.

II. 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).

III. Detailed designs, modelling calculations and plans 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.

IV. The design of the infiltration basins 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.

V. 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.

VI. 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 for each area/catchment of the development.

Reason:

To prevent flooding in accordance with National Planning Policy Framework paragraphs 173,175 and 180 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:

Prior to or in conjunction with the submission of each Reserved Matters application a detailed Site SuDS Phase plan which aligns with the site phasing plan shall be submitted to and approved in writing by the Local Planning Authority. This SuDS Phasing plan shall ensure that each phase does not exceed the agreed discharge rates for that phase and that source control measures are installed within each phase to adequately address the phases own surface water runoff. The plan shall ensure that each SuDS component is adequately protected throughout the development of the scheme. The plan shall show all exceedance routes throughout the site clearance and construction of the scheme ensuring flood risk is not increased elsewhere or to the site itself and that the site remains safe for all exceedance event flow routes for the lifetime of the development during rainfall (i.e. greater than design events or during blockage) and how property on and off site will be protected.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of Three Rivers District Council.

Condition 3:

Development shall not commence until details and a method statement for interim and temporary drainage measures during the demolition and construction phases have been submitted to and approved in writing by the Local Planning Authority. This information shall provide full details of who will be responsible for maintaining such temporary systems and demonstrate how the site will be drained to ensure there is no increase in the off-site flows, nor any pollution, debris and sediment to any receiving watercourse or sewer system. The site works and construction phase shall thereafter be carried out in accordance with approved method statement, unless alternative measures have been subsequently approved by the Planning Authority.

Reason: To prevent flooding and pollution offsite in accordance with the NPPF.

Condition 4:

The development hereby approved shall not be occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

I. a timetable for its implementation.

II. details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located and showing a minimum 3m easement around the SuDS features along with vehicle/parking access.

III. a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of Three Rivers District Council.

Condition 5:

Prior to first use of each phase of the development a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface water drainage scheme), has been submitted to and approved (in writing) by the Local Planning Authority. The verification report shall include a full set of “as built” drawings plus photographs of excavations (including soil profiles/horizons), any installation of any surface water drainage structures and control mechanisms.

Reason: To ensure that the development achieves a high standard of sustainability and ensure the flood risk is adequately addressed for each new dwelling and not increased in accordance with NPPF and Policies of Three Rivers District Council.

Informative for LPA

The LLFA notes the Environment Agency’s position and confirms that the suitability of infiltration is dependent on the required Environment Agency conditions being secured as part of any planning approval

9.10 Hertfordshire County Council – Minerals and Waste (February 2026): [No objection]

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 Data does identify that there could potentially be some sand/gravel deposits beneath the proposed development site, as identified in section 6 of the Minerals Resource Assessment.

As the Minerals Planning Authority, we agree that prior extraction is not necessary at the site, however we would encourage opportunistic extraction.

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.'*

Section 4.7 of the Planning Statement, Including Affordable Housing Statement makes reference to the 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, 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 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 reused 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).

9.11 Hertfordshire County Council – Public Health: [No response received]

9.12 Hertfordshire County Council – Water Officer: [Condition required]

Hertfordshire Fire and Rescue service (hydrants only) will require a condition for the provision and installation of fire hydrants, at no cost to the county council, or fire and rescue service. This is to ensure there are adequate water supplies available for use in an emergency, at all times

9.13 Hertfordshire Constabulary: [No response received]

9.14 Herts Ecology (26 March 2026): [More information required]

Summary of Advice:	
Advise - Insufficient information to determine application. The planning officer should either: 1. Refuse the applicant or advise it is withdrawn or, 2. Request further information from the applicant and re-consult the Ecology Service (LEADS) when it is furnished.	Pre-determination • Protected species – Further information required. • Local Wildlife Site and Irreplaceable Habitat • BNG – Further information required regarding habitat surveys. Determination • BNG - Enhancements are not significant. • Conditions and Informatives. Post- Determination • BNG - Additional units required, Guidance on the BGP stage.

Comments and recommended Conditions and Informatives:

1. Protected species

Breeding birds – The Ecological Assessment report notes that a number of breeding birds, Schedule 1 birds, birds on the list of Species of Principal Importance and birds of conservation concern were recorded on or in proximity to the site. All wild birds, their nests, eggs and young are afforded protection and in general terms it would be an offence to kill, injure or take any breeding birds and their young. Schedule 1 birds have additional protection against being recklessly or intentionally disturbed while in/building a nest with eggs/young, and against recklessly or intentionally disturbing any of their dependant young. To reduce the risk of an offence being committed, the recommended avoidance and mitigation measures for breeding birds given in the report (sections 5.83 – 5.85) should be adhered to, and as recommended in the report, I would advise that a Construction Environmental Management Plan (CEMP) is created and informed by these measures. I would recommend that this is secured by condition. Particular caution should be given during construction in those areas where breeding birds and birds of conservation concern were recorded.

A Species Enhancement Strategy including enhancements for breeding birds should also be submitted to the Local Planning Authority for consideration, and I would recommend that this is also secured by condition. This strategy should be informed by recommendations made in the report (sections 5.83 - 5.87). Notably, section 5.86 recommends that a range of bird boxes should be provided across the site on mature trees and within newly constructed dwellings to compensate for the loss of nesting bird habitat. As the report mentions that swallows were recorded breeding in the stables (section 4.82), the Species Enhancement Strategy should clearly detail the proposed location of swallow boxes to be installed, and this should be in line with best practice guidance.

2. Bats

As bats are classified as European Protected Species (EPS), sufficient information is required to be submitted to the Local Planning Authority prior to determination, so it can fully consider the impact of the proposals on bats and discharge its legal obligations under the Conservation of Habitats and Species Regulations 2017 (as amended). Activities involved in the projects proposals with the potential to negatively impact bats include:

- The demolition of B1 – B14.
- The loss of T55, G83, and T89-2 which have PRF-M suitability to support bat roosts
- The loss of T31 and T33 which have PRF-I suitability to support bat roosts
- The removal of parts of woodlands W2 – W6
- Losses to areas of modified grassland and other neutral grassland
- The loss of various trees and hedgerows

Bats in buildings

A total of fifteen buildings (B1–B15) were assessed for their suitability to support roosting bats. Buildings B1 and B5–B14 were deemed to be of negligible potential however B2, B3, B15 contained numerous PRFs (Potential Roost Features); which included: lifted tiles, missing mortar, lifted cladding, crevices etc. and required further surveys. B2 & B3 were graded as moderate suitability but subsequent emergence surveys confirmed no roosts present. Evidence of pipistrelle droppings (<50) were found in B4 but due to the absence of PRF's on this building this was concluded to be from opportunistic foraging only. B15 was considered a classic hibernation-style structure, of moderate roosting potential and a subsequent hibernation survey was carried out, which revealed no roosting bats. As a result, it does not appear that bats are using these buildings as a roost site. However, in the unlikely event that bats are found, given the proposal will involve demolition, I advise a precautionary approach to the works is taken and recommend the following Informative is added to any permission granted.

"If bats, or evidence for them, are discovered during the course of the 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."

Bats in trees

Six trees/tree groups (T31, T32, T33, T55, G83, and T89-2) were subject to an endoscope and aerial inspection survey on 19/01/26. This confirmed T31 and T33 had PRF-I Suitability, and T55, G83, and T89-2 had PRF-M Suitability. Bats are classified as European Protected Species (EPS), sufficient information is required to be submitted to the Local Planning Authority prior to determination. Since a number of trees are due to be and have been assessed as having Roosting features (T55, G83, T89-2), in line with The Bat Conservation Trust's good practice guidelines would require further surveys. This can either be in the form of 2 x bat emergence surveys or 2 more aerial/endoscope inspections (carried out 3 weeks apart in favourable conditions, between the months of May–Sept) to establish the presence or absence of bats. Consequently, so it can fully consider the impact of the proposals on bats and discharge its legal obligations under the Conservation of Habitats and Species Regulations 2017 (as amended) and in line with government guidance on the timing of surveys within the planning process, I advise that the application is NOT determined until these surveys have been completed to the satisfaction of the LPA.

In the event that a roost is discovered a bat mitigation licence issued by Natural England would be required.

Bat flight lines and dark corridors

The ecological appraisal includes data collected from static bat detectors deployed throughout the site during 2023 and 2025; the results of which indicate that the site has supported a wide diversity of bat species, with >10 species during 2023 reducing to >6 in 2025. Of the species recorded most notable are Barbastelle (*Barbastella barbastellus*) a rare woodland species, listed as vulnerable (IUCN 2019) which was most frequently recorded at Pheasants wood LWS woodland edge (where SD4 was located); Leisler's bat (*Nyctalus leisleri*) a near threatened woodland species; Serotine (*Cnephaeus serotinus*) a large and slow flying species classified as vulnerable; Nathusius' pipistrelle (*Pipistrellus nathusii*) a near threatened species; as well as long eared bat species *Plecotus sp.* and Noctule *Nyctalus noctule* open woodland species. Overall, the site was evaluated to be of up to regional importance for commuting and foraging bats.

All 18 species of bat found within the UK are known to avoid roosting and hibernating in the presence of artificial lighting (ALAN). The presence of ALAN is also reported to delay emergence from a roosting place and can cause the bats to abandon a roost site. Most species of bat, with the exception of *pipistrelle spp.*, are reported to avoid commuting along areas where artificial lighting is utilized. Moreover, many of these species will not cross lit corridors and so the presence of lit areas in the landscape can act as physical barriers to their dispersal. This has a particularly negative impact on light averse species such as all *Myotis*, and *Plecotus* species and the rare Barbastelle, which tend to be those which are more specialist and consequently often rarer.

The report states that key bat flight lines and foraging paths will be retained at the edges of the site and broadly through the north-west, south, and east, however on scrutiny of the proposed development plans there appears to be significant portions of the site where the presence the built environment and its associated lighting will impede upon the mapped flight paths outlined within the report. Static detector surveys revealed location SD1 and SD2 to have the highest overall number of recordings, areas which are currently native hedgerow (H3-H6) and a strip of mixed woodland (W3/W4); which are both due to be reduced or removed. In addition, the strip of woodland (W5) between SD1 and SD5 also appears to be a well-used flight path. W3/W4 and W5 are depicted in the arboriculture plans

with tarmac road surface following alongside the remaining treeline. The LWS woodland where SD4 was situated, had the highest overall recordings of Barbastelle bats. Therefore, it is crucial that these ecologically sensitive areas remain as dark corridors.

Due to these facts, it is imperative that a sensitive lighting strategy is prepared and produced. In order for the LPA to be confident that the development will achieve and maintain preservation the ecologically important dark corridors, this strategy should follow guidance set out in the Bats and Artificial lighting at night guidance note (GN08/23) prepared by the Bat Conservation Trust and the Institution of Lighting Professionals and should demonstrate the use of warm lighting ($\leq 3000\text{K}$, ideally $2700\text{--}3000\text{K}$), no upward light spill, direction of the lights away from woodland and hedgerows, the use baffles, shields, cowls or the inclusion of motion-activated lighting/ partial night lighting. Since the location of these dark corridors should inform the design stage of the development, I advise that a sensitive lighting plan is secured by Condition.

3. Great Crested Newt (GCN)

Great crested newts (including the animals, eggs, breeding sites and resting places) are protected by European and national legislation. These amphibians spend the majority of their lifecycle on land, typically up to 100m from their breeding pond but can travel further if suitable contiguous commuting and sheltering habitat is present.

A Historic records search was conducted, and the results revealed 53 records of GCN and a further 21 records of common toad. The nearest being within 215 m of the site. All records were located North/Northwest of the site and the habitat between sites is interrupted by impervious surface and the urban landscape. There are five small ponds all located within a 500m radius of the site South/Southwest. Two of which have been assessed as being of ornamental value only and are unlikely to provide GCN habitat, but the other three are semi natural, which may be of some value to GCN.

The proposed site itself currently contains no ponds, ditches, or open water and the majority of the terrestrial habitat in the South was assessed as being of low quality; horse grazed pasture. Despite this however; it is mapped as being "fringe" territory for GCN, which means there may be some risk of damaging GCN terrestrial habitat during the course of developments.

The site was assessed by the surveyors to have negligible potential for GCN, and no further surveys were required, however. It is noted that the site was visited for the purpose of reptile surveys between 12/09/23 and 06/10/23 whereby 94 artificial refugia was placed every 10m in locations across areas of habitat assessed to provide habitat for reptiles; specifically the grassland, woodland edges, scrub, and any potential hibernation areas within the site. Adult GCN are known to forage across terrestrial habitats including rough grassland, scrubland and woodland and during September to October can be found in these terrestrial habitats, where they often rest in suitable refugia by day and travel nocturnally when humidity and temperatures are more favourable. Therefore, it is possible that during the checking of refugia intended for reptiles, the ecologists may have also come across sheltering amphibians. The results of their reptile survey however concluded no evidence of reptiles, or amphibians using any of these refuge sites.

On this occasion I do not consider there is sufficient likelihood of great crested newts being present and affected for the LPA to require a formal survey prior to determination. However, as reptiles and amphibians can be put at risk of harm or killing during destructive works (including vegetation and building clearance), to avoid committing an offence, I advise a precautionary approach informative using Reasonable Avoidance Measures (RAM) is added to any permission granted:

"Keep any areas of grass as short as possible up to, and including, the time when the works take place so that it remains / becomes unsuitable for reptiles to cross. Clearance of

existing vegetation should be undertaken progressively using hand-held tools, where appropriate, towards boundaries to allow any animals present to escape to contiguous areas of habitat. Where any hedgerows, long grass or scrub are to be cleared, this work should be carried out in two phases. The first cut should be to >15cm to decrease the suitability of the vegetation for reptiles and encourage any reptiles present to move to retained areas of habitat. Where potential for reptiles to be present remains, following a minimum period of seven days, a second cut to ground level should be carried out in order to render the habitat unsuitable. Caution should be taken when moving debris piles or building materials as any sheltering animals could be impacted on. If a reptile is found, then it should be allowed to move safely out of the way on its own accord to contiguous habitat remaining on, or adjacent to, site. Any trenches on site should be covered at night or have ramps to ensure that any animals that enter can safely escape - this is particularly important if holes fill with water."

Local Wildlife Site and Irreplaceable Habitat

Pheasant's Wood LWS and Ancient Woodland: The development is adjacent to Pheasant's Wood Local Wildlife Site (LWS), of which a part is ancient woodland. Ancient Woodlands are a rare resource both nationally, making up only 2.4% of the land cover, and locally, representing only 4% of Hertfordshire. Because the complex ecology of ancient woodlands has developed over a long period of time it is not possible to recreate this habitat artificially by new woodland planting leading them to be classified within the NPPF and Natural England's standing advice as irreplaceable habitats. The NPPF states that:

"Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists".

The ancient woodland sits outside of the redline boundary, and a 15-metre buffer has been applied to the habitat in line with Natural England guidance. The ecological report also recommends securing long-term management of the wider LWS through a Section 106 agreement. However, the submission does not provide any detail on how the LWS and ancient woodland will be managed or protected.

Of particular concern is the proposal to create two new access paths leading into the ancient woodland and to install biodiversity information boards. This, combined with the population increase from the 333 new dwellings, is likely to lead to a significant increase in recreational pressure. Without appropriate management, this could result in loss of the habitat through processes like path creation, trampling, soil compaction, and disturbance to wildlife. The potential for recreational impacts has not been assessed or addressed within the application.

Given the sensitivity and irreplaceable nature of the habitat, clear evidence must be provided prior to determination to demonstrate that the ancient woodland and wider LWS will not be adversely affected. I therefore advise that the applicant is required to provide:

- A detailed management and protection strategy for the LWS and ancient woodland.
- Specific measures to mitigate recreational pressure, including long-term monitoring.
- Confirmation of how these measures will be secured.

Without this information, it is not possible to conclude that the proposals will avoid deterioration of an irreplaceable habitat.

BNG – Pre-determination

Habitat Assessment: Insufficient information has been provided to allow the LPA to consider the UK Habitat and habitat condition assessments provided. The baseline habitat map identifies the fields on site as either Modified Grassland (g4) or Other Neutral Grassland (g3c). However, the report provides limited supporting information to justify these

classifications. The species lists for the fields are broadly similar, and the assessment does not clearly explain how it applied the UK Hab criteria to differentiate between the two grassland types.

There are species present across all fields that are characteristic of higher distinctiveness habitats such as oxeye daisy, common knapweed, and birds foot trefoil, whilst all fields also include species characteristic of other neutral grassland but not modified grassland as listed in the UK Habitats. In addition, it is not clear how species richness has been applied to the classification. For example, Field 6 is described as Other Neutral Grassland has 4.9 species per m², whilst F11 has 10 species per m² which is described as Modified Grassland. Without further detail on species composition and structure it would be difficult to understand the rationale for this classification.

In order to correctly evaluate the habitat survey, I recommend that the ecologist provides additional information on how the distinction between Modified Grassland and Other Neutral Grassland was made. In particular, relative abundance data for each species within every field would be valuable, and how the habitats within each meet or fail the 4 tests set within the UK Habitats for other neutral grassland. In addition, how the presence of plants of a higher distinctiveness were considered in the assessment should also be explained.

Until this information is provided, I advise that the minimum information requirements have not been met and the application should not be determined.

Strategic Significance: The Biodiversity Statement and Draft Biodiversity Gain Plan details that Strategic Significance for the baseline habitat values was based upon the Hertfordshire Ecological Network map. Resultantly, some of the elements of the habitat baseline have been set as high strategic significance ('Formally identified in local strategy'). However, the date of completion of the metric is 7th February 2026, which is after the publication of the Hertfordshire Local Nature Recovery Strategy (LNRS). [Government guidance](#) indicates that, following the publication of the Hertfordshire LNRS, all elements of the baseline should have a value of low strategic significance ('Area/compensation not in local strategy/no local strategy'). The consequence of the existing metric is that the applicant will have to seek more units than would otherwise be required in order to achieve BNG. The applicant should be made aware of this should they wish to rectify this error in their metric – if so, this must be done prior to determination. However, should the applicant wish to leave the strategic significance values as they are in the existing metric, we would have no objection to this decision, given that more BNG units than otherwise required would be sought.

BNG – Determination

Significant On-Site Enhancement - The proposed Biodiversity Net Gain includes the on-site enhancement of substantial areas of medium distinctiveness habitat (Other Neutral Grassland) and Modified Grassland, together with the creation of medium and high distinctiveness habitat, notably Ponds, Other Neutral Grassland, and Urban Trees. As a result, I advise that the on-site biodiversity enhancements should be considered Significant and should be secured by either a planning condition, a planning obligation, or a conservation covenant, for a minimum period of 30 years following completion of the development.

Account should be taken in any such agreement of the cost to the LPA of reviewing required monitoring reports. This should reflect the large site size (20+ ha) and the highest technical difficulty of habitat creation/enhancement being Medium. Based on this, I advise that, in line with the Ecology Service (LEADS) monitoring cost calculator, a monitoring contribution of £8,764 would be appropriate.

This cost is dependent on the submission of monitoring reports to the LPA in years 1, 3, 5, 10, 15, 25 and 30.

Habitat Management and Maintenance Plan (HMMP) - I advise that the means by which the proposed on-site habitats will be created and enhanced (capital works) and subsequently managed for a minimum period of 30 years should be set out within a Habitat Management and Maintenance Plan (HMMP). The HMMP should be secured by planning condition, and I further advise that the HMMP is prepared using the Natural England HMMP template, to ensure clarity, consistency, and enforceability.

A net loss has been shown, and the trading rules have not been met. In line with government guidance, it would generally be inappropriate for concerns about the ability to discharge the condition to be used as a reason to refuse an application. However, the applicant should be made aware that the general biodiversity condition is a pre commencement condition and that if the applicant chooses not to address these matters prior to determination they will need to do so at the post determination stage.

BNG – Post-determination

At the biodiversity gain plan stage, an updated metric will need to be submitted showing how a net gain can be delivered. This could be either by the provision of further onsite non-significant enhancements, onsite enhancements that can be secured at the post determination stage or through the use of an off-site location. As a last resort, if an off-site location cannot be found, Biodiversity Credits would need to be purchased. In this latter case, the applicant must demonstrate to the satisfaction of the LPA that all other options have been fully explored and that the BNG hierarchy has been followed.

Off-site BNG: Where an off-site solution is sought, the spatial multiplier will need to be applied and, depending on the location of the provision, could require the purchase of more BU than is presently shown in the headline results. At the post determination site, the Off-Site Gain summary tab should be checked to ensure that the spatial risk multiplier has been applied as this will not reflect in the headline results.

LNRS & Post-determination strategic significance: The Biodiversity Statement and Draft Biodiversity Gain Plan details that the Hertfordshire Ecological Network map was used to determine strategic significance for the proposed on-site habitat enhancement and creation. However, as the metric was completed after the publication of the Hertfordshire LNRS, this strategic significance must be based upon the Hertfordshire LNRS. If the application is approved, the Biodiversity Gain Plan and supporting metric should reflect high strategic significant values for any areas (1) that are shown in the published local strategy and (2) deliver the mapped actions for that area. Any post-development habitat interventions that meet both of these criteria will achieve a biodiversity unit uplift. As such, the existing on-site habitat creation and enhancement sections of the metric will need to be updated based on the Hertfordshire LNRS in order to ensure the correct strategic significances have been set.

Biodiversity Gain Plan: I advise this is completed using the government template. In order for the Biodiversity Gain Plan to be discharged, it should be submitted with the following minimum information either within the body of the plan or as supporting information:

- A completed metric tool calculation that demonstrates:
 - a minimum 10% net gain achieved within the trading rules and consistent with the figures quoted within the Biodiversity Gain Plan.
 - a fully completed start page, including project details and the date that the final version of the metric was completed.
 - where off-site units are being used, these should be shown in the appropriate tab of the metric, and the off-site gain site summary should be completed.
 - a fully completed irreplaceable habitats tab, if relevant.
- Pre-development and post-development plans (showing the location of on-site habitat, the direction of north and drawn to an identified scale). Post-development plans should be sufficient to record the location of the post determination habitats within the final metric submitted to discharge the BGP.

- A compensation plan if the development affects irreplaceable habitats.
- If off-site units are being used, the biodiversity net gain register reference number will be required for a completed BGP.
- Proof of purchase if they're buying statutory biodiversity credits.
- A description of how they will manage and monitor significant on-site gains (for example, with a Habitat Management and Monitoring Plan).

Conditions and Informatives

Protected species mitigation - General - *"No development shall take place (including demolition, ground works, vegetation clearance) until a Construction Environmental Management Plan (CEMP) including a section for ecology has been submitted to and approved in writing by the local planning authority. The CEMP shall include but not necessarily be limited to, the following:*

- *A review of any ecological impacts. This should be informed by the avoidance and mitigation measures within the submitted ecological report (Ecological Assessment by Luscinia Ecology (6/2/26), including but not limited to those regarding: Reptiles, Breeding birds, Badgers, Hedgehogs, Bats, and GCN.*
- *Risk assessment of potentially damaging construction activities.*
- *Identification of 'biodiversity protection zones'*
- *A set of method statements outlining practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction.*
- *The location and timings of sensitive works to avoid harm to biodiversity features. (e.g. daylight working hours only starting one hour after sunrise and ceasing one hour before sunset).*
- *Use of protective fences, exclusion barriers and warning signs, including advanced installation and maintenance during the construction period;*
- *A non-native invasive species protocol (e.g. for Japanese knotweed);*
- *The times during construction when specialist ecologists need to be present on site to oversee works.*
- *Responsible persons and lines of communication.*
- *The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details."

Species Enhancement Strategy – *"A Species Enhancement Strategy by an appropriately experienced ecologist shall be submitted to and approved in writing by the LPA. The strategy should include enhancements regarding Breeding Birds including Swallows, Badgers, Bats. The scheme shall include, but not be limited to, the following details:*

- Purpose and conservation objectives for the proposed enhancement measures*
- Description, design or specification of the type of feature(s) or measure(s) to be undertaken.*
- Detailed designs to achieve stated objectives.*
- Materials and construction to ensure long lifespan of the feature/measure*
- Proposed Locations shown by suitable maps and plans and where appropriate the elevations of the features or measures to be installed or undertaken.*
- When the features or measures will be installed within the construction, occupation, or phase of the development,*
- Persons responsible for implementing the enhancement measures*
- Details of initial aftercare and long-term maintenance (where relevant)*

Thereafter, the biodiversity enhancement measures shall be carried out and maintained for their designed purpose in accordance with the approved details including timescales and shall be retained as such thereafter."

Bat Informative - *"If bats, or evidence for them, are discovered during the course of the 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.”

Sensitive Lighting Strategy: *“A lighting design strategy for bats shall be submitted to and approved in writing by the LPA. This should be informed by the relevant sections (i.e. section 5.14, sections 5.62 - 5.80) of the Ecological Assessment by Luscinia Ecology (dated 6.2.26) and accurately identify the features/areas of interest and the maximal illumination of these areas that will not compromise their existing use by bats. This should be shown in suitable contour plans and charts and accord with best practice (Guidance Note 08/23: Bats and artificial lighting in the UK, (BCT & ILP, 2023.)). No external lighting should be allowed to exceed these limits, unless agreed with by the LPA, either during (if important for long-term construction projects) or post-development.”*

Reptiles - Precautionary Approach Informative - *“Keep any areas of grass as short as possible up to, and including, the time when the works take place so that it remains / becomes unsuitable for reptiles to cross. Clearance of existing vegetation should be undertaken progressively using hand-held tools, where appropriate, towards boundaries to allow any animals present to escape to contiguous areas of habitat. Where any hedgerows, long grass or scrub are to be cleared, this work should be carried out in two phases. The first cut should be to >15cm to decrease the suitability of the vegetation for reptiles and encourage any reptiles present to move to retained areas of habitat. Where potential for reptiles to be present remains, following a minimum period of seven days, a second cut to ground level should be carried out in order to render the habitat unsuitable. Caution should be taken when moving debris piles or building materials as any sheltering animals could be impacted on. If a reptile is found, then it should be allowed to move safely out of the way on its own accord to contiguous habitat remaining on, or adjacent to, site. Any trenches on site should be covered at night or have ramps to ensure that any animals that enter can safely escape - this is particularly important if holes fill with water.”*

Local Wildlife Site informative: *“All works, including vehicle movements, materials and waste, are kept strictly within the curtilage of the proposed development site and that under no circumstances should there be any detrimental physical impact to the adjacent Local Wildlife Sites.”*

I trust these comments are of assistance and kind regards.

9.15 Historic England (11 March 2026): [No comment]

Historic England provides advice when our engagement can add most value. In this case we are not offering advice. This should not be interpreted as comment on the merits of the application.

We suggest that you seek the views of your specialist conservation and archaeological advisers. You may also find it helpful to refer to our published advice at <https://historicengland.org.uk/advice/find/>.

It is not necessary to consult us on this application again, unless there are material changes to the proposals. However, if you would like advice from us, please contact us to explain your request.

9.16 National Grid (March 2026): [Comment received]

We have received a notification from the LinesearchbeforeUdig (LSBUD) platform regarding a planning application that has been submitted which is in close proximity to our medium and low pressure assets. We have no objection to this proposal from a planning perspective, however we need you to take the following action.

What you need to do

To prevent damage to our assets or interference with our rights, please add the following Informative Note into the Decision Notice:

Cadent Gas Ltd own and operate the gas infrastructure within the area of your development. There may be a legal interest (easements and other rights) in the land that restrict activity in proximity to Cadent assets in private land. The applicant must ensure that the proposed works do not infringe on legal rights of access and or restrictive covenants that exist.

If buildings or structures are proposed directly above the apparatus the development may only take place following diversion of the apparatus. The applicant should apply online to have apparatus diverted in advance of any works, by visiting cadentgas.com/our-services/gas-diversions

Prior to carrying out works, including the construction of access points, please register on www.linesearchbeforeudig.co.uk to submit details of the planned works for review, ensuring requirements are adhered to.

9.17 National Highways (12 March 2026): [More information required]

Referring to the consultation on a planning application dated 24th February 2026 referenced above, in the vicinity of the M25 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);

Annex A National Highways' assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the strategic road network, in this case the M25. The SRN in the vicinity of the proposed development is the M25 Junction 17, which is approximately 2 miles away. The site shares a common boundary with the M25 carriageway.

This application is for the demolition of existing development and redevelopment of the Site, including the construction of up to 333 dwellings (Use Class C3) of which 50% affordable housing, 66 bed Care Home (Use Class C2), Medical Centre (Use Class E (e)), Local Centre [containing Retail (Use Class E (a-c)), Community Facilities (use Class F2) and Cafe (Use Class E(a))] and associated play space, parking and associated infrastructure. New vehicular access onto Shepherds Lane and pedestrian and cycle accesses onto Shepherds Lane and Berry Lane, bus stop, bike station, landscaping, pedestrian / cycleway access routes, green infrastructure including community amenity space, allotments, play areas, outdoor gym trail / equipment and associated infrastructure including sustainable urban drainage systems (all matters reserved except for access).

We have reviewed relevant documents that form part of this planning submission and are outlining our comments below.

Traffic Impact

We reviewed the Transport Assessment (TA) by Bellamy Roberts dated February 2026. The assessment forecasts that the proposed development would generate approximately 224 two-way vehicle trips to and from the site during the AM peak hour, and approximately 194 two-way vehicle trips during the PM peak hour.

The trip rates applied within the TA for the various land uses appear generally reasonable and consistent with expectations. However, the residential trip rate used for the PM peak hour appears slightly lower than might typically be anticipated. We have undertaken a sensitivity check in this regard and are satisfied that the variation is unlikely to materially influence the overall conclusions of the assessment.

No adjustments have been made within the TA to the trip rates or mode shares to reflect a vision-led assessment scenario. Nevertheless, given the location of the site and the anticipated propensity for future residents to utilise sustainable modes of transport, we accept that the assumptions adopted are likely to result in a more robust and conservative assessment of potential impacts on the M25.

Trip distribution has been derived using Census 2011 journey-to-work data. We have reviewed the trip distribution analysis presented in Appendix 24, together with the forecast turning movements presented in Appendix 25. These appear generally acceptable. However, it is noted that Appendix 25 does not appear to provide a separate set of turning movement diagrams showing the future year development flows in isolation, as these have been combined with future year background growth.

For clarity and ease of review, we request that a separate set of AM and PM peak hour turning movement diagrams be provided which disaggregate the future year development flows from background growth. These diagrams should cover the same geographical extent as the submitted assessment, including the SRN up to and including M25 Junction 17. Once these disaggregated turning movements have been reviewed, we will be able to determine whether any further assessment of the operation of M25 Junction 17 is required.

Drainage Considerations

From a drainage perspective, the proposed development does not appear to present a significant risk to the SRN. However, it is important that the development does not increase surface water runoff towards National Highways' estate.

Any pedestrian routes or paths leading to the proposed footbridge should not act as conduits for surface water runoff towards the SRN. Surface water arising from the development should be appropriately captured and managed within the site to ensure that there is no discharge onto National Highways' land and assets.

We have reviewed the submitted Flood Risk Assessment (FRA) and provide the following comments:

- ☐ The existing topographical information indicates that overland flow from the site could potentially affect the M25. The applicant should demonstrate that the proposed development will not result in an increase in flood risk to the motorway.
- ☐ Paragraph 4.11 of the FRA states that flooding will be contained within the site during a 1 in 100 year +40% climate change event. A contour plan of the proposed development, together with a plan showing the predicted extent of surface flooding, should be provided to demonstrate that there would be no impact on the M25
- ☐ The development proposes infiltration for the discharge of surface water runoff. The applicant should confirm the factor of safety (FoS) applied to the infiltration rates. The SuDS Manual (CIRIA C753) recommends a FoS of 10 where failure of an infiltration system could result in flooding of roads. The drainage design should therefore demonstrate that exceedance flows would not affect the SRN.

Recommended that planning permission not be granted for a specified period

Given the above, it is currently not possible to determine whether the application would have an unacceptable impact on the safety, reliability and/or operational efficiency of the SRN (the tests set out in DfT Circular 01/2022 and MHCLG NPPF 2024 [particularly paras 115 to 118]). This response details the steps that need to be taken in order to resolve this issue.

It is recommended that the application should not be granted permission for a period extending until 12th June 2026; unless in the meantime all queries and requirements raised by National Highways are fully resolved and this Holding Recommendation is replaced. This does not fetter the Council's ability, if they so wish, to either refuse the application or agree an extension of time beyond 12th June 2026.

Standing advice to the local planning authority

The Climate Change Committee's 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

9.17.1 National Highways (Second response, 30 April 2026): [No objections]

Referring to the consultation on a planning application dated 24 February 2026 referenced above, in the vicinity of the M25 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is as follows:

a) offer no objection (see reasons at Annex A);

Reasons:

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will be concerned with proposals that have the potential to impact on the safe and efficient operation of the strategic road network, in this case the M25. The SRN in the vicinity of the proposed development is the M25 Junction 17, which is approximately 2 miles away. The site shares a common boundary with the M25 carriageway.

This application is for the demolition of existing development and redevelopment of the Site, including the construction of up to 333 dwellings (Use Class C3) of which 50% affordable housing, 66 bed Care Home (Use Class C2), Medical Centre (Use Class E (e)), Local Centre [containing Retail (Use Class E (a-c)), Community Facilities (use Class F2) and Cafe (Use Class E(a))] and associated play space, parking and associated infrastructure. New vehicular access onto Shepherds Lane and pedestrian and cycle accesses onto Shepherds Lane and Berry Lane, bus stop, bike station, landscaping, pedestrian / cycleway access routes, green infrastructure including community amenity space, allotments, play areas, outdoor gym trail / equipment and associated infrastructure including sustainable urban drainage systems (all matters reserved except for access).

We have reviewed relevant documents that form part of this planning submission and are outlining our comments below.

Traffic Impact

We reviewed the Transport Assessment (TA) by Bellamy Roberts dated February 2026. We have also now reviewed additional information supplied in an Addendum Highway technical note dated 20 March 2026, produced in response to discussions with the Local Highway Authority (LHA).

The TA assessment forecasts that the proposed development would generate approximately 224 two-way vehicle trips to and from the site during the AM peak hour, and approximately 194 two-way vehicle trips during the PM peak hour.

The trip rates applied within the TA for the various land uses appear generally reasonable and consistent with expectations. However, the residential trip rate used for the PM peak hour appears slightly lower than might typically be anticipated. We have undertaken a sensitivity check in this regard and are satisfied that the variation is unlikely to materially influence the overall conclusions of the assessment.

No adjustments have been made within the TA to the trip rates or mode shares to reflect a vision-led assessment scenario. Nevertheless, given the location of the site and the anticipated propensity for future residents to utilise sustainable modes of transport, we accept that the assumptions adopted are likely to result in a more robust and conservative assessment of potential impacts on the M25.

We note that more recent discussions between the applicant and the LHA outlined in the March 2026 Addendum Highway Technical note have resulted in an updated sustainable transport approach for the site, including increased frequencies for the local bus services proposed to serve the site, which National Highways welcomes. This is also anticipated to be included within an updated Travel Plan for the site.

The proposed trip generation taken forward remains the same as laid out in the TA however, representing a robust future year scenario. Trip distribution has been derived using Census 2011 journey-to-work data. We have reviewed the trip distribution analysis presented in Appendix 24, together with the forecast turning movements presented in Appendix 25. We have separately been provided with AM and PM peak hour turning movement diagrams showing development generated traffic in isolation, including at M25 J17.

These appear to demonstrate that in a robust assessment scenario, the greatest impact on any one off-slip of the M25 J17 in a peak hour would be 18 additional trips. Given the current operation of the junction and the relatively low number of additional overall trips expected, this is not considered to represent a significant impact on the SRN.

Construction Traffic

The applicant has not provided information about which route construction vehicles will use to access the site. Our view is that Berry Lane is not a suitable route for heavy goods vehicles (HGVs). We do note the new vehicular access proposed from Shepherds Lane which may provide a more suitable route for HGVs travelling to and from the site.

Footbridge

The redline boundary of the site is adjacent to a private right of way footbridge that passes over the M25. The applicant must ensure that access is maintained to the footbridge for inspection and maintenance both during and after construction of the development.

Drainage Considerations

From a drainage perspective, the proposed development does not appear to present a significant risk to the SRN. However, it is important that the development does not increase surface water runoff towards National Highways' estate.

Any pedestrian routes or paths leading to the proposed footbridge should not act as conduits for surface water runoff towards the SRN. Surface water arising from the

development should be appropriately captured and managed within the site to ensure that there is no discharge onto National Highways' land and assets.

We originally provided the following advice in response to the Flood Risk Assessment (FRA) & Sustainable Drainage Strategy, dated February 2026:

- The existing topographical information indicates that overland flow from the site could potentially affect the M25. The applicant should demonstrate that the proposed development will not result in an increase in flood risk to the motorway.
- Paragraph 4.11 of the FRA states that flooding will be contained within the site during a 1 in 100 year +40% climate change event. A contour plan of the proposed development, together with a plan showing the predicted extent of surface flooding, should be provided to demonstrate that there would be no impact on the M25.
- The development proposes infiltration for the discharge of surface water runoff. The applicant should confirm the factor of safety (FoS) applied to the infiltration rates. The SuDS Manual (CIRIA C753) recommends a FoS of 10 where failure of an infiltration system could result in flooding of roads. The drainage design should therefore demonstrate that exceedance flows would not affect the SRN.

In response to review of the SuDS Addendum No. 1 ,dated March 2026, we raised the following comments:

- We note that the statement within the SuDS Addendum that "there is no existing flood pathway from the site to the M25 and no pathway will be created post-development" is not considered to be accurate. As shown on the diagram below, the north-eastern part of the central catchment slopes towards the M25 and the submitted information does not clearly demonstrate how surface water runoff in this area will be intercepted to prevent it from running onto the motorway.
- Other than the issue identified above, we are satisfied that the remainder of the proposed development would not result in surface water runoff or flooding impacting the motorway.
- Our previous comments regarding the long-term operation and maintenance of the proposed drainage system remain applicable. In particular, the Drainage Maintenance Plan should include clear and specific operation and maintenance tasks for soakaways and infiltration basins, and it is recommended that appropriate planning conditions are applied to ensure that maintenance will be properly implemented.

Following review of the Flood Risk Assessment & Sustainable Drainage Strategy, dated April 2026, we are satisfied with the information provided. National Highways has reviewed the conditions from the Lead Local Flood Authority and we are satisfied that drainage from the development will be suitably managed.

No Objection

Our concerns raised as set out in Annex A have been managed. On this basis we are satisfied that the development will not materially affect the safety, reliability and/or operation of the strategic road network (the tests set out in DfT Circular 01/2022, and MHCLG NPPF 2024 paragraphs 115-118) in this location and its vicinity.

Standing advice to the local planning authority

The Climate Change Committee's 2022 Report to Parliament notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 77 and 110 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 109 and 115 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up as part of a vision-led approach.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of PAS2080:2023 promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

9.18 NHS Hertfordshire and West Essex Integrated Care Board (27 March 2026): [Comment received]

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, community and mental health care outside of hospitals. 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.

Primary Care Networks (PCNs)

Within the HWE ICB there are 35 PCNs across the 14 localities, each covering a population of between circa 27,000 and 68,000 patients. PCNs are expected to deliver services at scale for its registered population whilst working collaboratively with acute, community, voluntary and social care services to ensure an integrated approach to patient care.

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: walking distance, quickest journey time, accessibility by public transport, parking provision.

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.

The HWE ICB keeps up to date PCN patient lists and closely monitors the current and future capacity of GP surgeries against Local Plan allocations/ housing trajectories.

The HWE ICB also ranks PCNs using existing premises data and known development data. This will identify and rank hotspots across the PCN patch where there is a need to explore projects to increase capacity, for example, by either re-configuring, extending or relocating GP practices to provide sufficient space to increase resources and clinical services to keep patient lists open.

Assessment of impact on existing Healthcare Provision

The HWE ICB has assessed the impact of the proposed development on existing primary health care provision in and around the vicinity of Rickmansworth and Chorleywood. This scheme is expected to deliver 333 homes, which based on an average occupancy of 2.4 will create 799.2 new patients. 66-bed care home will add another 66 patients.

These new residents will impact on Rickmansworth and Chorleywood PCN, which is formed of 2 GP practices and has a combined patient list of 29,881 as of 1 January 2025.

To illustrate their current capacity, individually as well as collectively - on PCN as well as settlement level please see the table below

Surgery Name	Settlement	PCN	Surgery level			Settlement level		PCN level	
			Pt list - 01/01/2025	Patients per m2	Number of patients capacity/ constraint relative to 18 per m2	Number of patients capacity/ constraint	Total NIA capacity/ shortfall	Number of patients capacity/ constraint	Total NIA capacity/ shortfall
Chorleywood Health Centre	Rickmansworth	Rickmansworth and Chorleywood	7,431	15.6	1,155	-293	-15	-293	-15
Gade House Surgery		Rickmansworth and Chorleywood	10,365	32.5	-4,632				
Witton House Surgery		Rickmansworth and Chorleywood	1,760	7.8	2,287				
The Colne Practice		Rickmansworth and Chorleywood	10,325	16.6	896				

*For the purposes of capacity assessment, we have adopted an alternative calculation to the NHS England "Principles of Best Practice" (referred to below) based on 18 patients per m2, which has regard to national GMS space guidelines but also considers opportunities for economies of scale.

This table demonstrates that Gade House Surgery is very constrained. In terms of premises need and priority, it ranks 8th out of 199 GP premises in the HWE ICB.

It can therefore be concluded that Gade House Surgery will be unable to accommodate the additional patient numbers arising from this development, and indeed potential future housing growth in and around the vicinity of Rickmansworth and Chorleywood. In reviewing all options, the HWE ICB has concluded that new health infrastructure in the form of on-site provision for a new medical facility will be needed to accommodate additional patient numbers arising from this development.

NHS GP premises and funding

By way of context, GP Practices are independent contractors that deliver NHS services - in most cases through General Medical Services (GMS) contract. In line with their contract, they receive payments for the delivery of GMS services as well as reimbursements of their premises costs

According to the terms of their GMS contract, GP contractors receive rent from NHS for using their premises (which they either own or lease) to provide NHS services from. In line with NHS Premises Costs Directions 2024, for the premises that the GP's own, NHS pays Current Market Rent (i.e. fair and reasonable rent as determined by the District Valuer). For

leased premises, NHS reimburses the lease rent that they pay to their landlord (also as verified by the District Valuer). In addition, NHS reimburses business rates and water rates.

If new and/or extended surgery buildings are required, these can be funded in various ways:

- NHS capital investment in the building works – GP practice will sign a Grant Agreement and as a result, their rent reimbursement is abated proportionately to reflect the amount of capital invested for a specified time period in line with NHS Premises Costs Directions 2024.
- S106/CIL investment in the building works – as above, treated in the same way as NHS capital investment.
- Capital investment by the practice.
- Capital investment by the landlord/third party developer.

In the latter two cases, where there is no NHS capital investment, yet the NHS receives the benefit of an increased and/or improved building, there is an increase in either the Current Market Rent (GP owned) or the lease rent (leased building) and the NHS commissioner will be liable for that additional revenue consequence. It should be noted that because all GMS contracts are contracts in perpetuity, the NHS will be liable for these costs indefinitely.

Please note, 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

Therefore, in terms of the HWE ICB's formal commitment to the proposal for a new on-site medical facility at Catlips Farm, Chorleywood, at this stage the following points must be considered:

- All projects are subject to Full Business Case approval by the ICB and NHS England.
- A commercial arrangement has to be agreed between the landowner, developer and end user based on a compliant design specification and demonstrate value for money.
- A project identified and costed in response to the planning application may not meet the objectives of NHS current strategies or could have significantly increased in cost, especially if there has been any significant time lapse from the date of the response to the date of implementation of the planning consent.

In the event the HWE ICB cannot support the delivery of a new medical centre at this location for viability, affordability and deliverability reasons, the HWE ICB will seek a financial contribution as calculated below.

Cost calculation of additional primary care healthcare services arising from the development proposal

The financial contribution for health infrastructure 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 consider any existing deficiencies or shortfalls in Rickmansworth or Chorleywood and its vicinity, or other development proposals in the area.

The proposed development would deliver 333 dwellings, which based on an average occupancy of 2.4 occupants per dwelling will create circa 799.2 new patient registrations. 66-bed care home will result in additional 66 patients.

- $799.2 + 66 = 865.2$ new patient registrations/2000 = 0.4326 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"
- $0.4326 \times 199 \text{ m}^2 = 86.0874 \text{ m}^2$ of additional space required
- $86.0874 \text{ m}^2 \times £7,000^* \text{ per m}^2 = £602,611.80$ (*Build cost; includes fit out and fees)

Total GMS contribution requested: £602,611.80 (indexed from the date of the planning permission)

If planning permission is granted, and in the event the HWE ICB cannot support the delivery of a new medical centre at this location for viability, affordability and deliverability reasons, the HWE ICB propose to focus Section 106 monies on the relocation of Gade House Surgery which explores options for a new medical facility within the locality to accommodate additional patient numbers arising from this development and future housing growth in and around Rickmansworth and Chorleywood.

It is also vital to consider the impact of new development, and the additional residents on community and mental healthcare, as occupiers of the development will also access a variety of healthcare. Based on recent cost impact forecasting calculations, the cost impact on community and mental healthcare is as follows:

Mental Health costs:

333 dwellings x £338.92 per dwelling = £112,860.36

Community Healthcare costs:

333 dwellings x £352.68 per dwelling = £117,442.44

Section 106 contributions towards these services support for the Rickmansworth and Chorleywood area will be focused on the proposed integrated Health Hub at Watford Town Hall Quarter, which is planned to include reprovision of the Avenue Clinic (current building is to be demolished). Contributions would be allocated to the Community Services provider Hertfordshire Community NHS Trust and the Mental Health Services provider Hertfordshire Partnership NHS Foundation Trust.

The HWE ICB therefore requests that these sums are secured through a planning obligation attached to any grant of planning permission.

A trigger point of payment on occupancy of the 1st dwelling is requested for GMS and community and mental healthcare planning obligations. Please note, the developer contribution figure(s) referred to in this response are a calculation only and that the final payment will be based on the actual dwelling unit mix and the inclusion of indexation.

Subject to securing the healthcare infrastructure and/or the developer contributions, 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.

The HWE ICB looks forward to working with the Council and the applicant to address the matters raised in this consultation response and would appreciate acknowledgement of receipt of this letter

9.19 Thames Water (February 2026: [No objection])

Waste Comments:

Thames Water has identified that the existing FOUL WATER network does not have sufficient capacity to support the proposed development. As such, we request that the following condition be attached to any planning permission granted:

The development shall not be occupied until confirmation is provided that either:

1. All necessary upgrades to the foul water network to accommodate additional flows from the development have been completed; or
2. A phasing plan for development and infrastructure, agreed with Thames Water and the Local Planning Authority, is in place. Where such a plan exists, no occupation shall occur other than in accordance with the approved phasing schedule.

Reason: Network reinforcement is likely to be required to support the proposed development. These upgrades are essential to avoid the risk of sewer flooding and pollution incidents.

If the Local Planning Authority considers this condition inappropriate or is unable to include it in the decision notice, it is essential to consult with Thames Water's Development Planning Department at Devcon.team@thameswater.co.uk before determining the application.

Please note where network modelling is required, Thames Water will need confirmation of outline planning permission, a development phasing plan, and evidence of land ownership to be submitted to devcon.team@thameswater.co.uk. Modelling can take 9-12 months to complete and will not commence until these have been provided.

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.

The foul water network in this catchment is impacted by high infiltration flows during certain groundwater conditions. Care must be taken when designing new networks to ensure they don't surcharge and cause flooding. Whilst design and construction guidance for sewers allows for an element of infiltration, we would expect in high risk areas such as this that additional precautions are taken to minimise infiltration; this should be in the form of the installation of leak tight liners within sewers and resin injection to seal chambers. This will help to mitigate the risk of flooding in the vicinity of the development (e.g. reduce property flood risk and travel disruption in the locality) and also help to reduce the risk of pollutions in the wider environment, particularly considering the impact of climate change. In the longer term, Thames Water, along with other partners, are working on a strategy to reduce groundwater entering public sewer networks.

The surface water network in this catchment is impacted by high infiltration flows during certain groundwater conditions. Care must be taken when designing new networks to ensure they don't surcharge and cause flooding. Whilst design and construction guidance for sewers allows for an element of infiltration, we would expect in high risk areas such as this that additional precautions are taken to minimise infiltration; this should be in the form of the installation of leak tight liners within sewers and resin injection to seal chambers. This will help to mitigate the risk of flooding in the vicinity of the development (e.g. reduce property flood risk and travel disruption in the locality) and also help to reduce the risk of pollutions in the wider environment, particularly considering the impact of climate change. Developers must liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. This must also ensure that the design of any SUDS or surface water management solution conveys exceedance flows away from public sewer networks. In the

longer term, Thames Water, along with other partners, are working on a strategy to reduce groundwater entering public sewer networks.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission:

'Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.'

The application indicates that SURFACE WATER will NOT be discharged to the public network and as such Thames Water has no objection, however approval should be sought from the Lead Local Flood Authority. Should the applicant subsequently seek a connection to discharge surface water into the public network in the future then we would consider this to be a material change to the proposal, which would require an amendment to the application at which point we would need to review our position.

Water Comments:

The applicant is advised that their development boundary falls within a Source Protection Zone for groundwater abstraction. These zones may be at particular risk from polluting activities on or below the land surface. To prevent pollution, the Environment Agency and Thames Water (or other local water undertaker) will use a tiered, risk-based approach to regulate activities that may impact groundwater resources. The applicant is encouraged to read the Environment Agency's approach to groundwater protection (available at <https://www.gov.uk/government/publications/groundwater-protection-position-statements>) and may wish to discuss the implication for their development with a suitably qualified environmental consultant.

With regard to water supply, this comes within the area covered by the Affinity Water Company.

9.20 Three Rivers District Council - Conservation Officer (16 March 2026): [Further information required]

The application is for Outline Application: Demolition of existing development and redevelopment of the Site, including the construction of up to 333 dwellings (Use Class C3) of which 50% affordable housing, 66 bed Care Home (Use Class C2), Medical Centre (Use Class E (e)), Local Centre [containing Retail (Use Class E (a-c)), Community Facilities (use Class F2) and Cafe (Use Class E(a))] and associated play space, parking and associated infrastructure. New vehicular access onto Shepherds Lane and pedestrian and cycle accesses onto Shepherds Lane and Berry Lane, bus stop, bike station, landscaping, pedestrian / cycleway access routes, green infrastructure including community amenity space, allotments, play areas, outdoor gym trail / equipment and associated infrastructure including sustainable urban drainage systems (all matters reserved except for access).

The Site does not contain any nationally listed buildings or Locally Important buildings, and no part of the Site is within a Conservation Area. The submitted HIA has described the Site

as containing grazing land, associated stables yards, barns and storage facilities to the north of Catlips Farmhouse and an area of woodland.

The submission is accompanied by a Heritage Impact Assessment (HIA) which has identified the following heritage assets which the proposal has the potential to impact:

- The Grade: II* listed King John's Farm, Penn Cottage, Penn Farm and Garden Wall (List Entry Number: 1100897), located to the west of the Site.
- Chorleywood Common Conservation Area, to the north of Berry Lane, beyond the northern boundary to the Site.
- Dapplere, Shepherds Lane, a Locally Important Building on the Three Rivers local list, close to King John's Farm (above) and west of the Site.
- Locally listed building (non-designated) south of Berry Lane, within the West Clayton Business Centre.

Grade: II* listed King John's Farm, Penn Cottage, Penn Farm and Garden Wall List Entry Number: 1100897

These have architectural and historic interest due to their age, form, level of survival and association with William Penn. The buildings at an elevated site level and there is little intervening development between them and the Site. However, the house does not appear designed to take in views over the open land and views from the property are well contained by the distance and intervening woodland. On this basis, the proposal would have an acceptable impact on the significance of the Grade II* listed buildings in heritage terms.

Chorleywood Common Conservation Area

The Conservation Area has a Conservation Area Appraisal (CAA) adopted in 2010. Its special interest is related to the open rural nature of the Common and the integration of the Common with surrounding built form which creates an area of architectural interest. The Site extends northwest towards the southeast corner of the Conservation Area, closest to Character Zone C of the Conservation Area. This covers part of Chorleywood Bottom and the lower edge of the Common, forming the southern section of the Conservation Area which has a rural character mixed with developed sections.

The submitted HIA acknowledges that the surrounding landscape, including the Site, contributes positively to the setting of the Conservation Area, partly in the undulating topography and long-range views, including those into the Site.

The HIA identifies two of the 'Important Views' in the CAA as being relevant to the proposal. While these are not numbered or annotated in the CAA, these are labelled as Viewpoints VP05 and VP06 in the submitted LVA (separate 'Verified View Document'). The HIA states that VP05 captures the relationship between the Common and the wider valley including the Site and allows intervisibility with the Site. However, it states that this is not a prominent view and intervening residential development is present. The second is VP06 which takes in visibility of Chorleywood Common and the Conservation Area from the north of the Site, which the HIA describes as not being interrupted by the proposal.

The HIA states that existing trees and hedgerows along Berry Lane and areas of Woodland and the undulating topography work to screen or curtail much intervisibility and that a proposed green buffer and set-back of development within the northern part of the Site will further aid this visual screening.

The HIA finds in conclusion that the proposal would only result in a smaller change to a wider setting of the Conservation Area and finds no harm to Chorleywood Common Conservation Area from the proposal.

However, there is an additional Important View in the CAA which is relevant to the proposal. This is an elevated view from Chorleywood Bottom just north of the railway bridge and the junction with Station Approach, looking south towards the Site. While most of the proposed

built form has been set behind the ridge of the slope, to avoid intervisibility, houses in the North Field Character Area sit forward/north of an existing tree line on the ridge of the slope. There is potential for intervisibility here which has the potential to impact the significance of the Conservation Area through erosion of its rural setting. It is recommended that an addendum is provided covering this viewpoint with at least wirelines of the proposed development and a related update to the HIA.

An additional consideration is in relation to access. It is noted that the vehicle access would be from Shepherds Lane to the south and that only pedestrian and cycle access would be permitted from Berry Lane to the north. This would have an acceptable impact on the character of the Conservation Area. Avoidance of additional vehicle access from Berry Lane is supported, as this would avoid an intensification of traffic and resulting urbanising impact on the edge of the Conservation Area.

Daplemere Shepherds Lane

Daplemere is a Locally Important Building. It is a two-storey house which may have seventeenth century origins and later alterations, which has local streetscape quality. There is no historic connection and limited scope for intervisibility with the Site and the proposal would have an acceptable impact on the Locally Important Buildings in heritage terms.

Building South of Berry Lane at West Clayton Business Centre

The building south of Berry Lane is a Locally Important Building. It is a vernacular building sits with a modern business centre. There are likely to be limited views towards the Site. However, the Site only makes limited contribution to its significance, and the impact in heritage terms is likely to be acceptable subject to details.

Farm Buildings within the Application Site

It is noted that the Site contains buildings related to Catlips Farm, including the original Farmhouse and barns (identified as buildings 1 and 5 in Section 2.3 of the D & A Statement), which date from the early twentieth century or earlier.

Three Rivers has Local List criteria which includes architectural interest, function, historical interest and landmark or landscape quality. The buildings on Site have not been identified as Locally Important buildings, but they may have relevant characteristics that qualify them for inclusion. NPPG Paragraph: 040 Reference ID: 18a-040-20190723 states that local planning authorities may also identify non-designated heritage assets as part of the decision-making process on planning applications.

The proposal would require clearing or complete loss of these buildings. It is recommended that further investigation and assessment is undertaken as part of an HIA addendum to establish whether they meet the relevant criteria as non-designated heritage assets.

Conclusion

To fully assess the heritage impacts of the proposal, further information as highlighted above should be provided. This relates to viewpoints from within the Chorleywood Common Conservation Area towards the Site. Also, further information regarding any heritage significance of existing farm buildings within the Site.

This response has been made with regard to Planning (Listed Buildings and Conservation Areas) Act 1990 Sections 66 (1) and 72 (1) and The National Planning Policy Framework Chapter 16 'Conserving and Enhancing the Historic Environment'.

9.21 Three Rivers District Council - Environmental Health (April 2026): [No objections, subject to conditions]

Air Quality

I have also reviewed the air quality report ref: AdO25200-R1-V2 issue Date 26/1/2026. I am satisfied with the conclusions drawn for the operational aspects of the report and there would not have any further queries or any conditional requirements.

Land Contamination

The Roberts Environmental Ltd Phase 1 assessment has been completed in support of the planning application for the proposed residential masterplan on land at Catlips Farm, Chorleywood.

The Phase 1 assessment identifies the Site as being in existing arable land use with no potentially significant contaminative sources identifiable. Historical potentially contaminative land uses have not been identified. It is however noted a scrapyard, waste storage/removal area is positioned in the Site centre, and a historical landfill is listed as being present on-site.

Ground conditions are recorded as comprising the Beaconsfield Gravel Deposits underlain by the Seaford and Newhaven Chalk Formations. The majority of the Site is within a groundwater Source Protection Zone (SPZ) 1, with the very northern Site portion within a SPZ 2. Groundwater abstractions are not within 1km of the Site. Surface water receptors are limited to a field drain 66m south.

Potentially significant ground gas sources have not been identified on-site or within the surrounding area with a low risk assigned to ground gas. Within the assessment Roberts Environmental have determined whilst a landfill is recorded on-site in addition to potentially infilled areas in the surrounding area given the age of infilling being >30 years the rate of ground gas generation is unlikely to be significant. It is however advised ground gas monitoring is completed to confirm the risk to users. Details as to the date of infilling for the landfill noted as being on-site have not been made available.

The preliminary conceptual model developed identify low risks for all potential pollutant linkages with exception of the following;

- Risk to future human health receptors from contaminants in the Made Ground associated with the scrapyard and agricultural use where soft landscaping is proposed. Risk Low to Moderate.
- Risk to controlled water receptors (Superficial and Bedrock Aquifer) from leachable contaminants present on-site from the scrapyard and agricultural use.

Overall a low to medium risk for the Site has been assigned to the Site for which as part of the required recommendations an intrusive ground investigation is specified

Assessment of compliance with LCRM

Assessment of compliance with LCRM identifies the completed Phase 1 assessment as being generally compliant. As identified in the report potential contamination sources have been identified notably the scrapyard area, and the potential on-site landfill for which intrusive investigation is required to establish whether significant contaminant concentrations exist and whether complete pollutant linkages to identified receptors exist. Prior to the intrusive ground investigation further research should be completed on the potential for the landfill on-site, we note a gravel pit is located on historical plans directly north east of the Site, there is potential this gravel pit located off-Site which the environmental report is identifying on-site.

Recommendations

An outline application has been made in which the Phase 1 Assessment has been submitted. We consider contaminated land matters at the Site can be dealt with by suitably worded conditions which require submission of the following documentation prepared in accordance with LCRM and submitted to the council for approval.

- A Tier 2: Generic quantitative risk assessment to investigate potential plausible contaminant linkages identified by the Tier 1 assessment. The scope of ground investigation shall be agreed with the LPA in advance of the works commencing;
- A Tier 3: Detailed quantitative risk assessment if the Tier 2 assessment identifies one or more potential contaminant linkages that need a detailed assessment;
- A Remediation Options Appraisal, Remediation Strategy and Verification Plan;
- A Remediation Verification report to demonstrate that risks have been reduced, the remediation objectives and criteria have been met, and the site is suitable for use.

9.22 Three Rivers District Council – Housing (17 March 2026): [Comment received]

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.

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.

Housing Services would be generally supportive of the proposed development, noting that it provides a good mix of family-sized homes and that 70% of the affordable housing is proposed as social rent, with the remaining 30% as affordable housing. This approach aligns with identified local housing needs, particularly the demand for larger family accommodation.

9.23 Three Rivers District Council – Landscape Consultant (to review LVIA): [Comment received]

Summary

Not supportive on landscape grounds	☒
No landscape objection, subject to attached recommendations and/or conditions	☐
Further information required prior to determination	☐

This review is based on a desktop study with a site visit undertaken on 14/04/2026, of the above-referenced application and its submitted documents. Our Landscape comments are as follows:

Site Context

The site at Catlips Farm is located approximately 200m west of the M25, and approximately 1km east of Chorleywood Station. It is an irregular shaped development site, stretching from Berry Lane in the north to Shepards Lane in the south. Just to the north of Berry Lane is the London Underground Metropolitan train line.

Pheasant's Wood in the east contains some designated Ancient Woodland. Chorleywood Common Conversation Area sits less than 100m to the north of the site. Chorleywood Common is also a Local Nature Reserve with numerous Public Rights of Way (PRoW) running through it. The common also contains a private golf course. The site is located in the Metropolitan Green Belt.

No PRoWs run through the site. There are trees with TPO's located across the site, principally clustered around the southern boundary of the site.

Further north of the common, the Chilterns National Landscape sits just over 1km from the site.

The site is undulating, particularly in the northern area which drops quickly down to the railway line and Berry Lane.

Planning Policy Context

Three Rivers Core Strategy (2011)

The site lies within the Green Belt, and any proposed development must have regard to current green belt policies, specifically Policy CP11 of the Core Strategy (October 2011) and Policy DM2 of the Development Management Policies Local Development Document (2013). In landscape terms, the following policies are also relevant:

Core Strategy (October 2011)

CP1: Overarching Policy on Sustainable Development

CP9: Green Infrastructure

CP11: Green Belt

CP12: Design of Development

Development Management Policies Local Development Document (2013)

DM1: Residential Design and Layout

DM2: Green Belt

DM6: Biodiversity, Trees and Landscaping

DM7: Landscape character

DM11: Open Space, Sport and Recreation Facilities and Children's Play Space

The site forms assessed parcel NCFS13 Catlips Farm (Chorleywood) which were deemed undevelopable in the Strategic Housing & Employment Land Availability Assessment (SHELAA) 2026, primarily due to being in an unsustainable location.

Three Rivers Landscape Sensitivity Assessment Addendum III 2026

The site was assessed in the above report as parcel NCFS13 Catlips Farm (Chorleywood). It was assessed to have Medium-High sensitivity to built development.

Chorleywood Neighbourhood Plan 2020

Relevant policies within the Chorleywood Neighbourhood Plan include:

Policy 2 – Characteristics of developments in the Parish (including Conservation Areas)

Landscape Character

Within the Hertfordshire County Council Landscape Character Assessment, the site is identified as Area 002 – Heronsgate Heights. Relevant key characteristics of the LCA are as follows:

woodland areas that flow over the slopes into the narrow dry valleys to the east

M25 major feature on the skyline to the east

sinuous though level plateau with considerable pasture and equestrian land

coherent settled pattern parkland areas, some in institutional uses

Chorleywood Common

Review of the proposal/submitted information:

Landscape and Visual Impact Assessment (LVIA)

The planning application is supported by an LVIA undertaken by CGLA Landscape Architecture, January 2026. It is noted that the LVIA is produced in response to pre-

application advice from Place Services in April 2025. The LVIA is produced generally in accordance with Guidelines for Landscape and Visual Impact Assessment 3 (GLIVA3) (2013), and the methodology is generally appropriate, with observations noted below.

Landscape Character

The LVIA correctly identifies the site as being within Area 002 – Heronsgate Heights.

The LVIA states: “The scheme has been designed as a landscape-led settlement extension, retaining key boundary vegetation, reinforcing woodland edges and responding to the wooded plateau character of the Heronsgate Heights landscape.” Whilst this is true in some respects, the site is unique within the landscape character area as it has localised undulations. The LCA states: “Degree of slope. Generally, less than 1 in 50 over the plateau. Locally up to 1 in 7 at Chorleywood Common.” The current layout does not respect the gradients of the site as development is located on some of the steepest slopes, to the north.

The LVIA states that the site is within NCA 110 Chilterns. However, the site straddles two National Character Areas. The site is predominantly within NCA 115 Thames Valley, with the northern section within NCA 110 Chilterns. We would expect to see both NCAs scoped into the assessment, to gauge the transitional qualities of the site.

We would also expect to see the Local Nature Reserve mapped out and the impact upon these assessed. Chorleywood Common is assessed for its recreational use, but not in relation to its Local Nature Reserve designation. Further mapping is required to understand the designations within the proposed assessment radius. The appropriate assessment radius has not been discussed.

Whilst the site does not sit within the Chilterns National Landscape, it is 1km away. It is accepted that intervisibility with the site from the National Landscape is unlikely, however we would have expected to see the National Landscape scoped into the assessment, in line with policy DM7: Landscape Character.

Visual Amenity

Whilst the text notes that the assessment has been scoped against a Zone of Theoretical Visibility (ZTV) this has not been included, so comments on whether the study area is appropriate cannot be made.

The LVIA states: “Landform and vegetation combine to create a contained visual envelope, with limited intervisibility between the site and the wider landscape.” This is a general statement and cannot be deemed relevant to the entire site, which has intervisibility from the northern parcels into Chorleywood Common and the southern parcels which are visible from PRoWs to the southwest (PRoW Chorleywood 29). It is accepted that the centre of the site, around the farm buildings, visibility is contained by the landform, woodland belts and settlements or infrastructure. We assess the impacts on PRoW (Chorleywood 30) to be adverse.

We welcome the additional viewpoints that have been provided during the consultation stage. However, these are produced when trees are in full leaf and as a result do not show the ‘worst case’ scenario. These views show that the development will be seen from Chorleywood Common (glimpsed views from PRoWs and clear views from permissive paths). However, the assessment of effects has not been altered in reference to the additional viewpoints.

We believe the long-term visual impacts on Chorleywood Common will be higher than negligible. This is due to development being placed over the ridgeline and visible from multiple PRoWs within the common, as well as amenity areas.

If development were kept closer to the centre of the site and behind existing established hedgerows it would have a reduced impact.

A Type 3 visualisation is requested from Viewpoint 09 from within Chorleywood Common to clarify the impacts, to be in line with Landscape Institute Technical Guidance Note 06/19.

Effects

We are generally in agreement with the way the effects have been assessed, although if the above elements discussed were to be scoped in, we believe the impacts would be assessed as more severe. We suggest effects on Landscape Character (slight adverse in long term) and visual effects on Chorleywood Common (slight adverse) should be assessed higher. In terms of the mitigation, it is noted within the LVIA that “development has been deliberately focused within the central and northern parts of the site”. However, there is large portions of development to the south. Also, focusing development to the north is also locating it near the sensitive receptor of Chorleywood Common. We expect the mitigation aims or the Parameter Plans to explicitly state the minimum standoff distances of 15m.

Tree Survey

Whilst an Arboricultural Impact Assessment (AIA) has been submitted, a full tree survey has not been. An arboricultural survey of the trees before any development is proposed is required. Also, within the tree survey/AIA we expect to see any trees with Tree Preservation Orders (TPOs) clearly identified, as currently the LVIA makes reference to TPOs but the AIA does not.

Layout

The net gain of publicly accessible space is welcomed, as is improved north to south pedestrian connections. Additional connections into the existing PRow network in the east are also welcomed.

Locating greenspace/play space in the centre of the scheme alongside the boulevard road is questioned.

Despite the LVIA describing the proposals as “landscape-led”, the proposals are of a rigid form, and it is not possible to see how the proposals respond to natural topography. The spot levels on topographic plan supplied with the application are illegible, but the site is particularly undulating in the northern parcel, where direct routes are shown to Berry Lane. It is questioned whether direct routes across steep slopes are achievable.

We expect to see more street trees within the proposals, in line with NPPF para 136. This is expected along the primary access road. We also expect to see the central boulevard to have trees lining both sides of the street to work effectively as a boulevard.

Summary

Overall, we have some concerns that the LVIA does not sufficiently scope in necessary receptors.

Following this we feel that assessment of landscape and visual effects have been undervalued.

Currently we have concerns that impacts from the northern, southern and eastern development parcels are not effectively mitigated.

In particular, we request a Type 3 visualisations from VP12 and VP13 to fully appreciate the impacts upon Chorleywood Common Local Nature Reserve, Conservation Area and Public Rights of Way Network.

We request information on TPOs to be included within the tree survey, this is in relation to Policy DM6 Biodiversity, Trees, Woodlands, Watercourses and Landscaping.

Recommended Submission Document(s):

If minded for approval, we advise that a Landscape Strategy is required. This document should set the overarching principles proposed as part of the scheme. This should include detail on mitigation measures (highlighted in the LVIA), retained landscape features, landscape enhancements and green corridors and connectivity. This should be accompanied by a detailed plan for long term management that details vegetation management techniques such as grazing, mowing and strimming.

From a landscape perspective, the Detailed Design Code should aim to encapsulate and recognise the essential integration of both green infrastructure and landscape principles. The Design Code does not however, provide a sufficient detailed breakdown of the typology of greenspaces and / or the landscape and character areas proposed. As a result, it is unclear how the character of these spaces, including [but not limited to] their functions, scale, materials, planting, play requirements, boundary treatments, SuDs features, facilities, natural surveillance, ecological enhancements, paths and cycleways, transitions, topography, drainage, etc will be guided as the level of information provided fails to set out clear and detailed design parameters to steer and guide future development proposals.

If minded for approval, we would expect the following palettes to be provided within the Detailed Design Code:

- Colour / materials (including building materials, streetscape / landscape materials, street furniture, play equipment, boundary treatments);
- Hard landscape materials (including all streetscape / hard landscape materials and surfaces, street furniture, lighting, service utilities and covers);
- Street furniture;
- Signage / wayfinding;
- Boundary treatments, including typologies;
- Tree planting (roots, branches, leaves, shading, species, tree pits / surface treatments); and
- Planting palette (including small trees and shrubs, structural planting, ornamental planting, ground cover planting, mown grass paths, wildflower meadow).

9.24 Three Rivers District Council – Leisure Development Team (16 March 2026): [Comment received]

These comments are given to help the development achieve the aims of Three Rivers District Council's Local and Strategic plans and National Policy Framework sections detailed below:

- Achieving Sustainable Development
- Promoting Healthy Communities
- Health and Wellbeing

Officers would recommend that:

1. Consideration needs to be made of play/physical activity provision that incorporates all ages including young people and adults.
2. Provision needs to include considerations for active play/physical activity in line with the council's play and sport and physical health strategies.
3. The 66-bed care home and medical centre have no provision, equipment or nature provision nearby and therefore equipment needs to be closer for any targeted activities to address mental health and well-being and physical activity requirements.
4. Consideration for the location of play areas in a more natural environment where there are young lungs at play (not near traffic).
5. More thought is given to the position of the pond so that it benefits the entire site e.g. care home and medical centre

- Outdoor leisure equipment must conform to the following standards:
 - Playground Equipment & Surfacing – BS EN 1176 & 1177

- MUGA's (Multi Use Games Areas) – BS EN 15312 – Free Access Multi Sports
- Skate Parks – BS EN 14974 – Roller Sports Equipment
- Outdoor Fitness Equipment – BS EN 16630
- Parkour Equipment – BS EN 16899
- New play spaces should be located with regard to areas of deficiency (and designed following the same principles as if they were being implemented by the local authority).
- Particular attention should be given to DDA compliant access to any leisure areas including pathways, seating and equipment as per the Equality Act 2010 (or the Disability Discrimination Act 1995 in Northern Ireland).
- Provision of sustainable active travel to support an active lifestyle, such as being bike friendly.
- Where leisure provision is made by the developers, design advice must be sought from Three Rivers Leisure team which must include DDA compliant access, details of installation, quality details of all materials used, adherence to RoSPA recommendations such as gates and fences etc and RoSPA inspection of installed pieces of equipment.
- Please consider vehicle access for maintenance of any leisure areas.
- Operator signs for any leisure areas will need to be included for reporting of maintenance or reparation issues.
- A full Risk assessment of any leisure equipment should be considered including for any water features in line with RoSPA.
- A RoSPA report or design risk assessment should take place of any proposed play and/or leisure equipment.
- Provision for the on-going maintenance of any leisure facilities should be detailed, particularly if it the developer plans to formally hand over to the leisure facility to the Parish Council or Three Rivers District Council. This must include DDA compliancy certification as per the Equality Act 2010 (or the Disability Discrimination Act 1995 in Northern Ireland)., details of installation, quality details of all materials used with the relevant certification, detailed maintenance guides for each piece of equipment, RoSPA inspection of installed pieces of equipment, adherence to RoSPA recommendations such as gates and fences etc.
- Officers would recommend that guidance on leisure facility planning (eg: Play England or Sport England) is sought from the relevant bodies and adhered to.

It is requested that the following condition is imposed which is based on:

(i) A detailed specification of the proposed equipment and other operations associated with leisure facilities, RoSPA assessment, ongoing maintenance and a programme of implementation.

Three Rivers District Council's Leisure team can provide examples of acceptable completed documents and contractor's specifications to the applicant to assist with meeting the requirements of the above condition.

9.25 Three Rivers District Council – Local Plans Team (12 March 2026): [Comment received]

The application site has not been allocated as a housing site by the Site Allocations Local Development Document (2014) 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:

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

The site is not within a defined settlement, although parts of the north of the site adjoins the Key Centre of Chorleywood and the south-east of the site is relatively close to the Key

Centre of Mill End (to the east of the M25). Given the existing use of the site as a farm, parts of the site is previously developed land, although the majority is greenfield land. The development would result in the net gain of up to 333 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 333 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 planning statement sets out that 50% of the dwellings would be affordable housing (although exact numbers would be confirmed at reserved matters stage), which would make a significant and positive contribution to the affordable housing need within the district.

The application site is located in the Metropolitan Green Belt. 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:*
 - mineral extraction;*
 - engineering operations;*
 - local transport infrastructure which can demonstrate a requirement for a Green Belt location;*
 - the re-use of buildings provided that the buildings are of permanent and substantial construction;*
 - material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and*
 - 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:

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;

There is a demonstrable unmet need for the type of development proposed;

The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of this Framework; and

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'.

The council is undertaking a Stage 4 Green Belt Review, which has not yet been formally published. As part of the review, there will be an assessment as to whether edge of settlement Green Belt parcels are "provisional grey belt". It must be noted that the assessment of grey belt is a planning judgement, with each case assessed under its own merits, whereby planning officers may have a different outcome to the Green Belt Review.

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:

	1- bed	2- bed	3- bed	4+ bed
Market Housing	4%	21%	42%	32%
Affordable Home Ownership	19%	39%	30%	13%
Social / Affordable Rented Housing	20%	32%	35%	12%

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. 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".

The east of the site adjoins a Local Wildlife Site. Policy DM6 of the Development Management Policies Local Development Document sets out that:

"Development that would affect a Site of Special Scientific Interest, Local Nature Reserve, Local Wildlife Site or protected species under UK or European law, or identified as being in need of conservation by the UK Biodiversity Action Plan or the Hertfordshire Biodiversity

Action Plan , will not be permitted where there is an adverse impact on the ecological, geological or biodiversity interests of the site, unless it can be demonstrated that:

The need for the development would outweigh the need to safeguard the biodiversity of the site, and where alternative wildlife habitat provision can be made in order to maintain local biodiversity; and

Adverse effects can be satisfactorily minimised through mitigation and compensation measures to maintain the level of biodiversity in the area.

The site was submitted to the Local Plan process via the call for sites process in January 2025. During the council's Part 5 Regulation 18 consultation in July-August 2025, the council stated that it had "significant concerns" about the site. The consultation document summarised that *"We have significant concerns relating to the development of this site, that mainly relate to the two potentially unsustainable single lane country roads that lead to it and the associated lack of public footpath access on these narrow lanes. While information has been submitted to address this in the form of a preliminary transport assessment, we are yet to consult statutory bodies on this. Further to this, the site lies in a gap between Chorleywood and Rickmansworth that could be considered bridged by this development. Any development would need to provide suitable mitigation to address issues relating to transport, access and impact upon adjacent Local Wildlife Site. Development would potentially be required to provide open space, children's play space, a primary school, community centre, local shops and a health centre/GP"*.

The site was **not** included within the emerging Local Plan Part II – Site Allocations document (January 2026), which identifies locations the council considers suitable for future development. At the 27 January 2026 Extraordinary Full Council, the Part II Local Plan document was agreed to proceed to Regulation 19 Consultation. However, on 5 February 2026, the council was issued a holding direction by the Minister of State for Planning and Housing preventing the council from taking *"any step in connection with the adoption of the Plan"*, including proceeding with the Regulation 19 consultation until the Minister reviewed the emerging Plan's evidence base. At the time of writing, this holding direction is still in place and the emerging Local Plan has not proceeded to Regulation 19 consultation.

9.26 Three Rivers District Council – Tree and Landscape Officer: [Not yet received]

No response received at the time of drafting report.

9.27 Three Rivers District Council – Urban Design Consultant: [Comment received]

Summary

The proposed development has been considered from an Urban Design perspective. Based on the submitted drawings, Design and Access Statement and other associated documents, our recommendation is as follows:

Recommendation:	Not yet supportive on urban design grounds
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Our recommendation is set out in further detail below.

Policy Background

The National Planning Policy Framework Section 12 requires that developments: Create high quality and sustainable buildings and places.

- Function well.
- Are visually attractive as a result of good architecture, layout and appropriate landscaping.

- Are sympathetic to local character, including the historic built character, while not preventing increased densities.
- Create a strong sense of place through definition of streets and distinctive forms.
- Optimise the potential of the site to create an appropriate amount and mix of development.
- Create places that are safe, inclusive and accessible.
- Are consistent with the principles set out in the National Design Guide (NDG).

In addition, the following local policies applies:

Policy CP1, CP10 and CP12 of the Three Rivers District Council Core Strategy (October 2011).

Site Context

The site is located between Chorleywood and Mill End. It is understood to be a greenbelt site used for equestrian and agricultural purposes. Chorleywood Common and the railway line (including Chorleywood Station) are located to the north of the site, and the M25 bounds the site to the east. The site comprises a number of existing fields separated by vegetated field boundaries and there are also a number of footpaths and areas of woodland within and adjacent to the site.

Pre-application feedback was provided with a site visit and pre-application advice meeting on 27th March 2025, and this feedback was summarised in a written response in a letter dated 09th April 2025. Our response follows on from this pre-application advice.

Review of Submitted Information

The site is located within the Metropolitan Green Belt and in light of the green belt location, it is understood that there are wider planning challenges to overcome to ensure that the proposal is acceptable. It is further noted that the site forms part of assessed parcel NCFS13 Catlips Farm (Chorleywood) which were deemed undevelopable in the Strategic Housing & Employment Land Availability Assessment (SHELAA) 2026, primarily due to being in an unsustainable location. Our comments are focused on the urban design proposals for the site.

Outline Application

It is understood that access is part of the detailed consideration at the outline stage, and all other matters are reserved for future consideration.

In reviewing the supporting material, the application sets out a clear vision for the development. The application also includes a detailed analysis on the site's relationship with the local context in terms of access, site history, green infrastructure and local character as well as the site characteristics and site constraints and opportunities analysis which have been developed to inform the design approach. The inclusion of this information responds to Paragraph 16 of the National Design Guide to outline the design story for the proposals.

To inform the outline application the key design principles have been set out within the DAS and this has been translated into an illustrative masterplan, following pre-application and community consultation. A parameters plan has been developed to illustrate the design parameters that will inform a more detailed reserved matters application for the look and feel of the development. We have reviewed the submitted material and our comments are included in the sections below.

Access, Connectivity and Movement

Relevant NDG Principles:

- M1: Proposals should include a connected network of routes for all modes of transport.
M2: Proposed development should promote active travel.

Access and Wider Connectivity

The proposals indicate that vehicle access will be provided via one vehicle access point off Shepherds Lane, with a secondary emergency access provided off Shepherds Lane. The DAS outlines that Shepherd Lane is unclassified and to facilitate the development the proposal to introduce a series of highway improvements which include traffic calming measures, enhanced street lighting and upgraded footways. In terms of pedestrian access, there will be a series of pedestrian access points connecting to the surrounding road and footpath network.

Regarding access, connectivity and movement, the National Design Guide highlights that well-designed places create a connected network of routes which are safe, functional, limit reliance on the car and promote activity. Furthermore, local policy supports this approach with policies from the Three Rivers Core Strategy CP1 Overarching Policy on Sustainable Development (part I and M), CP10 Transport and Travel and CP12 Design of Development (part N) outlining the requirements for new developments.

In reviewing the proposals, it is considered that access, connectivity and movement are a core consideration at the outline stage and a challenge for the site due to the site constraints of the surrounding road and footpath network. The constraints include rural or single-track roads with no footpaths, tight hedgerow or fence boundaries and topographical constraints. Significant material and commentary has been provided to address the site's connectivity issues, which were highlighted at the pre-application stage and it is understood this has subsequently also been raised by other consultees and planning policy documents such as the SHELAA.

From a vehicle access perspective, it is noted that the site vehicle access has been located at the wider part of Shepherds Lane which is considered logical. However, there is concern that the quality of the road connections to Chorleywood is unlikely to support connectivity to the settlement the development it is closest to. Shepherds Lane and Berry Lane are both narrow and tightly bound by hedgerows which appear to restrict connectivity and resultantly vehicle movement will be directed to Rickmansworth instead. Furthermore, there will also be an increase in servicing and delivery vehicles using a poor road network. Resultantly, we have concern in the response to Core Strategy CP1 part M and the sustainability of this development.

It is also considered crucial for a development of this scale to prioritise active travel and there is a concern that the surrounding road and footpath network does not facilitate safe, functional and convenient movement. The submitted material includes a walking route video of the route from Chorleywood Station to the site. Whilst this is useful in terms of highlighting time taken, the video highlights unsurfaced sections, and narrow parts between hedgerows and fences which are unlikely to be suitable for all users or welcoming and safe at all times of the year or day and night. The final section is also on the carriageway of Shepherds Lane. The proposed development of 333no. dwellings plus 66 bed care home would generate well in excess of 1000no. residents. When considering this is the primary access route to nearby facilities there is concern that the active travel network is substandard for a development of this scale and it would push users into a reliance on the car. Resulting in a poor response to CP1 part L and M, CP10 and CP12.

Despite this, it is understood from the Addendum Highway Note and Active Travel England Planning Application Assessment Toolkit Report that the applicant is committed to upgrading the surrounding active travel network through improvements to the footways, lighting, traffic calming and 'quiet lanes'. Resultantly, we would default to the highway authority and sustainable transport officers in determining whether the proposed mitigation

measures are acceptable. We would, however, highlight the following range of guidance on creating high-quality active travel connections, which includes the National Model Design Code and National Design Guide Movement Sections, Sport England's Active Design Principles P1, P2, P3 and P4, Building for a Healthy Life Integrated Neighbourhoods and Manual for Streets, amongst others.

Internal Site Layout Connectivity, Permeability and Movement

In terms of reviewing the proposed layout response to connectivity and movement it is acknowledged that the parameter plan is the core document to assess at the outline stage. However, an illustrative masterplan has been submitted in support of the application to demonstrate how the proposed development could come forward and be accommodated on the site.

In reviewing the design development, the key design driver 1. Connected Neighbourhood Network diagram outlines an aspiration to provide a strong north-south connection and connections to the surrounding footpath network. This is considered to be a positive design driver. However, when overlaying this plan on the parameters plan and comparing the two plans, there is concern that the proposals do not fully respond to, or maximise, the potential for a north south connection or encourage connectivity to the footpath.



Whilst it is appreciated the diagram is illustrative, it is considered that the block structure, street and footpath network could be aligned better with pedestrian desire lines to facilitate equitable and legible connectivity to the identified footpath connections. Consideration should be given to the pedestrian desire lines to create legible and inviting pedestrian connections. There is the opportunity to use the street network, key green spaces and the block structure to set structural framework for a connected layout and at present the proposed parameter plan does not facilitate the design driver aspiration. Diagram Key Design Driver 1 overlayed with parameter plan.

Furthermore, if as a result of the pedestrian connectivity analysis and the site constraints, the approach to pedestrian movement has now changed, we would expect to see an update to the Connected Neighbourhood Network diagram and result changes to the parameter plan and illustrative masterplan.

When reviewing the illustrative masterplan in terms of movement and connectivity, there is further concern that the proposed layout does not respond positive to the National Design Guide and best practice design policy. There are a number of instances of poor responses to well-designed movement and connectivity design principles (See NDG Principles M1, M2, M3, P1, P2, P3, Core Strategy CP12 Part H, I, J, amongst others) and these are highlighted in the table below.

Layout Location	Comment
	The key east-west footpath and green space is backed onto by dwellings on both sides, creating a poorly overlooked movement route which raises concerns of safety and an unwelcoming nature with poor integration of a positive space and natural asset leading to a missed opportunity. The trim trail feature is backed onto and poorly activated by built form. This raises concerns around safety and overlooking.
	At the central part of the layout there is no formal segregated pedestrian and cycle footpath providing connectivity from the key pedestrian cycle route on the western boundary. This is the key connection to the wider area, and it is likely to result in convoluted routes and presents a missed opportunity in encouraging active travel. The central north south block is also considered to be a barrier to east-west movement as pedestrian paths are narrow and sufficient space to encourage a visual connection for legible movement has not been provided. (As highlighted by the red arrow).
	The key connection to the east is considered poorly designed. The route is backed onto by housing creating an unwelcoming poorly activated and overlooked access at a key connection. Furthermore, the route terminates at a hedgerow which creates a convoluted access into the site.

	Whilst not a formal designated footpath, the northeastern finger of development removes the existing movement route through the middle of the existing fields. This fails to respond to the site's context and is a missed opportunity for a flat and direct movement route.
	The perimeter pedestrian route and trim trail feature is backed onto and poorly activated by built form. This raises concerns around safety and overlooking. The approach further creates a poorly overlooked area of open space which is at risk of poor integration with the site and the potential for antisocial behaviour.

In addition to these highlighted issues, the layout includes streets dominated by parking, narrow pedestrian cut throughs which are poorly activate by built form and a separation of uses. These issues will be outlined in further detail in the layout sections below.

Overall, in terms of connectivity and movement, there are a number of challenges in integrating and connecting the site into Chorleywood and at present the design approach does not provide enough assurance that the proposal will prioritise, facilitate and encourage active travel modes. From a design perspective, there are missed opportunities within the layout to create a legible and connected movement network throughout the layout which have not been realised. We would encourage the applicant to readdress the parameter plan and masterplan in line with the above comments.

Layout

Relevant NDG Principles

C1: Proposals should understand and relate well to the site, its local and wider context.

M1: Proposals should include a connected network of routes for all modes of transport.

M2: Proposed development should promote active travel.

U3: Proposed development should be socially inclusive.

P1: Proposals should create well-located, high quality and attractive public spaces.

M3: Proposed developments should have well-considered parking, servicing and utilities infrastructure for all users.

At the pre-application phase, it was highlighted that site constraints such as topography, noise, ecology and landscape should be assessed to inform the siting of housing and structure of the layout. It is considered positive that further analysis has been included in the DAS and the layout has evolved since the pre-application stage. However, when reviewing the layout, there are a number of concerns around the approach to the proposed

and the structure provided. It is highlighted that Core Strategy Policy CP12 part D requires the balance of making efficient use of land whilst respecting the distinctiveness of the surrounding area.

When reviewing the structure of the layout there is a key concern that the internal hedgerow and trees surrounding the existing Catlips dwellings and farm buildings has been removed. Whilst a tree survey has been provided, this area falls outside of our specialism, and we would typically defer to Arboricultural and Ecological consultants. However, there is concern that the proposed layout does not accord with the Nature section of the National Design Guide, as it appears to fail to adequately integrate existing natural features into the site layout. There is concern that the collective removal of trees and hedgerows would result in a loss of a positive natural asset and to accord with the landscape led aspirations, the proposed layout should be designed around the site's natural features, not the other way around. The current arrangement of hedgerows provides an ecological corridor across the site and there is a missed opportunity to facilitate a green link through the proposals. The extent of the removal is highlighted on the below overlay:



In response to the arrangement of uses, it is noted that there has been a number of changes since the pre-application stage. The proposed layout now separates out different uses with a care home in the southwestern corner, the medical centre in the southeastern corner and a retail use in the central southern part of the site. This is different to the previously proposed central community hub approach which clustered uses at the centre of the site.

The National Design Guidance and National Model Design Code Use's sections highlight the desired approach to mixing uses where uses are clustered and co-located to ensure successful activity and vitality. This is further supported by Sport England's Active Design Principle 4 and the Building for a Healthy Life Facilities and Services section.

From an urban design perspective, there is a concern that the proposal fails to respond to best practice design and create the opportunity for a vibrant and successful community with non-residential uses contributing positively a central hub that is accessible for all and

contribute to a focal point for the site. The approach to separate out the care home and medical centre suggests a lack of integration within the site and the approach results in duplicating parking requirements, as opposed to sharing parking spaces. In terms of the retail, the imagery of the proposed community shop is considered positive, however, it is considered to lack detail in terms of access and servicing.

A significant change from the original layout concept is the treatment of open spaces. The layout has been revised to push the previously proposed central green park to the periphery. In terms of best practice design this also misses an opportunity to create a centrally located open spaces which contributes to the character, provides a focal point to the development and ensure equitable access for residents. It is considered important to respond to the character of Chorleywood, which is characterised by the development around Chorleywood Common as the central focal point open space. It is also considered a missed opportunity to not integrate a central open space to create a strong rural character for the scheme, that balances housing provision with open space, nature and activity.

On review of the block structure, it is unclear what design drivers have influenced the layout and block structure. The site is set within an irregular hedgerow network, and the surrounding urban grain is organic and rural in form and character. The proposed parameters plan development areas include rigid structures, and the illustrative masterplan includes rigid block structures with straight roads and geometric blocks.

Core Strategy Policy CP12 part D requires development to respect the distinctiveness of the surrounding area and the National Design Guide Context Principles C1 and C2. From reviewing the areas surrounding the site it is evident that the characteristics of the urban grain are organic, rural and follows the topography. This results in a layout that appears to have been imposed on the site, rather than shaped to fit the site characteristics and local vernacular. We resultantly have concerns around the integration within the site and Chorleywood context.

There is also a concern that the layout does not adopt a perimeter block structure as there are a number of incomplete blocks where the backs of dwellings front on streets and pedestrian routes, landscape spaces such as pocket parks and hedgerows. Where blocks are arranged to have back-to-back housing, there is often an inactive edge to one or two sides of the block, which undermines the quality and activity of the streetscape. Whilst there are positives to a more rigid structure, such as the efficient use of land, density and efficient movement, the layout should be contextually appropriate, and the layout fails to adequately respond to the local characteristics and existing site features.

Furthermore, there are also questions around the design of the layout in relation to the site's topography. Whilst there is a development platform of relatively level land on the southern and central areas, part of the site is irregular topographically. In the northeast wing of development, the blocks have been orientated perpendicular to the site's topography, and this may result in civil engineering challenges where retaining walls between dwellings are required. It is considered best practice to align dwellings with the site topography to allow for the placement of retaining walls between rear gardens.

Parking

The Design Code Section of the DAS outlines the approach to parking which is highlighted as "parking across the site is designed to be discreet and visually unobtrusive, ensuring that streets and public spaces are pedestrian-focused and landscape led".



The Design Code includes positive aspirations where parking is tucked to the side of dwellings, integrated within courtyard spaces, limited on street and tucked behind community facilities. However, the Design Code outlines the concept of parking courts within rows. This, however, is considered to be off-plot street frontage parking which results in long continuous rows of parked cars within the street scene. In reviewing Policy CP12 Part O and the National Design Guide Principle M3, this is considered to result in a dominance of parking within the internal streets. For example, the extracted block is surrounded by rows of parked cars and this will clutter the street and encourage use of the car. As highlighted above, this part of

the layout is a key pedestrian connection, and it is effectively lined with parked cars.

Best practice progressive approaches to car parking include the use of car barns such as [Woodstock North by PTE](#). However, at a minimum it is expected that car parking is effectively integrated into the layout with a mixture of parking typologies used to avoid the use of frontage parking and cluttering streets with parking cars. There are opportunities to use small-scale well observed parking courtyards to address the highlighted parking issues. In its current iteration, the illustrative masterplan does not give us the assurance that parking can be appropriately accommodated within the layout.

Placemaking and Architecture

Relevant NDG principles:

I2: Proposals should have well designed, high quality and attractive places and buildings.

I3: Proposals should create character and identity.

B2: Proposed development should have appropriate building types and forms.

Whilst it is appreciated that the proposal is at the outline stage and all matters on placemaking and architecture are to be considered at the reserved matters stage, we have reviewed the emerging architectural proposals. It is welcomed that an assessment of local character has been included within the DAS. This assessment identifies typical architectural features and materials, for Chorleywood Village, Chorleywood Common, Berry Lane and Stag Lane, Heronsgate/Long Lane Mill End and Moneyhill, and Dog Kennel Lane. This has then been developed into the character areas section which illustrates the emerging proposals. The submitted illustrations and CGI's are considered to include a number of positive architectural features and suggest a high-quality contemporary design approach. However, it is considered that further justification is provided on following:

- The relationship with local context and how the local architectural features have been brought into the design approach and character areas.
- The relationship with architecture and the layout to understand how placemaking has been considered. A placemaking plan which illustrates the treatment of nodes, landmarks, key corners, vistas and street frontages should be developed to ensure a high-quality place which is legible and has a strong identity and character is set within the design code.
- How built form features, roofscapes and materials will be used within each character areas.

- It would additionally be positive to see further clarification of where CGI imagery is located within the layout and ensure the proposals truly reflect what is illustrated on the layout. For example, the extent of car parking is often not included in the CGIs.
- There is considered to be further opportunity to retain, adapt or use the existing stable and barn buildings as either the retail focal point or to use the farmstead typology to inform parts of the layout by clustering and grouping dwellings in a farmstead arrangement to respond to the sites character and context.

It is considered further inspiration should be sought from precedent developments such as [Abode, Great Kneighton, Cambridge](#) (see images below), in the treatment of development edges.



Design Code

The DAS includes a Design Code section. In reviewing this, there is concern that the design code does not effectively operate to code the design features of the proposals. It is expected that an effective code is separate and a different from a DAS and the document is developed to operate as a framework to inform the detailed design parameters of a development and the future phases. The design code does not include mandatory design requirements or coding principles and uses language such as 'should' which loosely depict what may come forward on the site. It is encouraged that at the outline stage a robust design code is developed which locks in the specific design coding principles, which provides assurance to the LPA how development will come forward. Design coding is expected to be specific, numerical, visual and detailed covering all principles of the National Design Guide and National Model Design Code. Should the application be considered acceptable, we would encourage the inclusion of a design code condition to develop a more detail and higher quality design code that is developed in collaboration with the community and LPA.

Sustainability and Lifespan

Relevant NDG principles:

R1: Proposals should follow the energy hierarchy.

R2: Proposals should make a careful selection of materials and construction techniques.

In reviewing the DAS, sustainability is a key feature of the design vision and we welcome the aspiration for energy efficient homes, SuDS and an ecological landscape strategy.

However, for a development of this scale the proposed approach to sustainability lacks detail and is mostly focused on the ecological, biodiversity and landscape elements of sustainability and limited evidence has been provided into how sustainable design features, such as solar orientation, have influenced the layout and further information could be provided on energy use, building design and materials, use of renewables in line with Principles R1 and R2 of the National Design Guide.

Conclusion

In summary, and based on the submitted plans and supporting information, in its current form the outline design proposals do not provide sufficient evidence that a proposed development can come forward to accord with national and local design policy. As highlighted above, there are access and connectivity concerns to both the sustainable connection to the wider area and permeability and movement through the site.

The DAS, proposed parameters plan and illustrative masterplan do not provide assurance that the development has duly considered the site's constraints, opportunities and existing natural assets and features to develop a contextual, landscape-led proposal that integrates within the site and surrounding area.

The submitted illustrative masterplan includes a number of features that are contrary to design policy and best practice. This includes the treatment of development edges, block structure, overlooking and activation of public spaces and there are missed opportunities to co-locate uses and integrate open spaces features.

Furthermore, the submitted layout does not duly inform how parking can be appropriately accommodated on the site or provide assurance of how the best practice design features such as placemaking and sustainability have influenced the layout. We are additionally concerned that the Design Code element does not function effectively in coding the design principles for the future reserved matters application. Should the application be considered acceptable we would recommend a Design Code condition as part of the approval process.

As a result of our assessment at this stage, we would request that further review of the site characteristics, surrounding context, national and local design policy and best practice guidance documents, and precedent schemes are undertaken. We would then request that amendments are made to the layout in line with the above commentary, and alongside the further justification on the structural elements such as the topography, removal of hedgerows and connectivity before the development could be considered as appropriate from an urban design perspective. In its current form, the development is considered contrary to Core Strategy Policies CP1, CP10 and CP12, alongside Section 12 of the NPPF and the principles of the National Design Guide.

9.28 Transport for London (May 2026): [No comment]

Following internal consultation, the conclusion was that TfL have no comments to make on this consultation.

10 **Appendix 2 – Maps from Green Belt reviews**

Stage 1 Green Belt Review: Site is within Parcel SW9
(blue line indicates approximate extent of the site)



Stage 2 Green Belt Review: Site is within Parcel CH3
(blue line indicates approximate extent of the site)

