

## PLANNING COMMITTEE – Thursday 18 June 2026

### 25/1691/FUL – Replacement of The Glade Bridge at THE GLADE BRIDGE OVER THE RIVER COLNE, ADJACENT GRAND UNION CANAL OFF CHURCH STREET, RICKMANSWORTH

Parish: Batchworth Community Council.

Ward: Rickmansworth Town

Expiry of Statutory Period: 05.12.2025

Case Officer: Lauren Edwards

Extension of time agreed: 19.06.2026

Recommendation: That Planning Permission be approved subject to conditions.

Reason for consideration by the Committee: The application has been submitted by the Three Rivers District Council leisure department and TRDC are land owners.

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=T3FU3AQFI9L00>

#### **1 Relevant planning history**

1.1 None.

#### **2 Site description**

2.1 The application site is located on the southern side of Riverside Drive, Rickmansworth. The site has an irregular shape and relates to the existing pedestrian access from Riverside Drive to the Glade Bridge. The existing bridge provides access over the Rivers Chess onto the towpath of the Grand Union canal. This provide access along the towpath to the east toward Watford or west toward the south entrance to the Aquadrome and further toward Hillingdon.

2.2 The existing Glade Bridge is a wooden structure with steps and ramps linking the towpath to the pedestrian access from Riverside Drive over the River Chess and is built of timber.

2.3 The application site falls within the Metropolitan Green Belt.

#### **3 Description of proposed development and background**

3.1 This application seeks planning permission for the replacement of The Glade Bridge.

3.2 The existing bridge would be replaced with a new bridge in the same location. The layout of the bridge would remain the same except for the removal of the steps and would be ramp only access. It would be higher in the centre than existing with a base of 600mm. It is also proposed to change the materials from a wooden structure to recycled plastics/composite structure. The bridge would have a maximum height of 2.3m above ground level.

3.3 Three low quality trees are proposed for removal to facilitate the works.

3.4 Amended plans were received during the course of the application to increase the base of the bridge and to include a mammal ledge.

#### **4 Consultation**

##### **4.1 Statutory Consultation**

4.1.1 National Grid: [No response received]

4.1.2 Landscape Officer: Made the following comments:

This application is acceptable in principle subject to the following conditions:

Prior approval of a tree protection plan, including ground protection along the full length of the construction access route and beneath the materials storage area. The Landscape Officer also requests tree protection fencing along the full line of the construction access route.

5 replacement trees are requested for T3, T7, G12, T13 and T16. These could be willow, elder, swamp cypress, dawn redwood, alder or poplar, ideally a mix for diversity. These could be planted as standards, within the area of nettles that will be covered by the storage area.

4.1.3 Environment Agency: [Objection overcome initial objection at Appendix A]

Thank you for re-consulting us on the above application on 9 April 2026. Environment Agency position based on a review of the submitted information, we are now in a position to remove our previous objection to the proposed development.

This is because the applicant has demonstrated a 300mm freeboard above the 1 in 100 year plus an allowance for climate change modelled flood height at 46.11 mAOD, with the soffit height proposed a 46.41mAOD. Please include the below informative for any permission granted.

*Informative - Environmental permit – Flood risk activities - advice to applicant*

The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:

- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
- altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
- building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river
- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
- any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
- any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit Flood risk activities: environmental permits - GOV.UK or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing [enquiries@environmentagency.gov.uk](mailto:enquiries@environmentagency.gov.uk) .

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity.

#### *Advice to applicant Signing up for flood warnings*

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning or visit Sign up for flood warnings - GOV.UK. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email, or text message. Anyone can sign up. Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families, and precious items to safety.

Flood warnings can also save lives and enable the emergency services to prepare and help communities. For practical advice on preparing for a flood, visit Prepare for flooding: Protect yourself from future flooding - GOV.UK To get help during a flood, visit What to do before or during a flood - GOV.UK For advice on what do after a flood, visit What to do after a flood - GOV.UK

Pre-Application Advice Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at [HNLsustainableplaces@environment-agency.gov.uk](mailto:HNLsustainableplaces@environment-agency.gov.uk). Further information on our charged planning advice service is available at: Planning and marine licence advice: standard terms for our charges - GOV.UK

#### *Final comments*

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

#### 4.1.4 Herts Ecology: [No objection]

##### *Comments*

We are broadly in agreement with the conclusions of the BNG Metric, Biodiversity Checklist and Ecology Report. Therefore, the application can be determined. Further comments are set out below and planning conditions have been put forward for inclusion.

##### *Biodiversity Net Gain (BNG)*

The BNG Metric has been correctly completed. A BNG Assessment is detailed within Appendix 4 of the accompanying Ecology Report, and the information provided is deemed to be sufficient.

The Ecology Report also includes a UKHab map (Figure 2) and Habitat Conditions (Page 3).

The total net % change is predicted as being a +277.52% net gain in Habitat Units. However, to meet the 10% mandatory BNG requirement for watercourses, the Applicant must secure off-site Biodiversity Units via a third-party provider.

## *Ecology Reporting*

The Biodiversity Checklist and Ecology Report are considered adequate for the determination of the planning application. The Ecology Report was undertaken by a suitably qualified ecologist with the correct methodology applied. Surveys are in-date and the UKHab baseline has been included. Survey limitations are addressed, and no identified constraints are deemed to be significant. The impacts are assessed correctly, and appropriate mitigation measures are clearly outlined.

### *Conditions and Informatives*

#### 1. Biodiversity Net Gain (BNG)

##### 1.1 Overall Biodiversity Gain Plan (Pre-Commencement)

*No development shall commence until an overall Biodiversity Gain Plan (BGP) has been submitted to and approved in writing by the Local Planning Authority (LPA). The plan should be completed using the government template and shall include the following minimum information either within the body of the plan or as supporting information:*

- *Completed metric tool calculation that demonstrates:*
  - *A minimum 10% net gain achieved within the trading rules and consistent with the figures quoted within the BGP.*
  - *A fully completed start page including project details and the date 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 offsite gain site summary should be completed.*
  - *Where relevant a fully completed irreplaceable habitats tab.*
- *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 the Applicant buys statutory biodiversity credits.*
- *A description of how they will manage and monitor significant on-site gains (Habitat Management and Monitoring Plan).*
- *Evidence of a legally secured delivery mechanism (s106 Agreement or Conservation Covenant).*

*Development shall be carried out in accordance with the approved plan.*

*Reason: The BNG Metric and Report identify the requirement to secure a minimum 10% biodiversity net gain. A condition is required to ensure the approved metric is translated into a deliverable, enforceable plan covering habitat creation, enhancement, monitoring and reporting.*

##### 1.2 Biodiversity Net Gain 30-Year Habitat Management & Monitoring Plan (HMMP)

*The development shall not commence until a detailed 30-year Habitat Management and Monitoring Plan (HMMP) has been submitted and approved in writing by the LPA. It must align with the HMMP template produced by DEFRA, be prepared in accordance with the approved Biodiversity Gain Plan, and include the following:*

- *A non-technical summary.*
- *The roles and responsibilities of the people or organisation(s) delivering the HMMP.*

- *The planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved BGP.*
- *The management measures to maintain habitat in accordance with the approved BGP for a period of 30 years from the completion of development.*
- *The monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the LPA.*

*Thereafter, the approved plan will be implemented in accordance with the approved details for the duration of 30 years.*

*Reason: To comply with the Environment Act 2021 and BS42020 clauses 8.5 and 11.1–11.2, ensuring BNG is deliverable, measurable and legally secured for 30 years.*

We further advise that the Applicant takes account of the cost to the LPA for reviewing the reports sent to them over the 30-year period and detail the report frequency in the s106 agreement. We refer the Applicant to use this information in the metric Monitoring Cost Calculator previously supplied By the Ecology Service (LEADS) HCC to the LPA.

## 2. Construction Environmental Management Plan (CEMP) (Pre-Construction)

*No development (including demolition) shall take place until a CEMP has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include:*

- *Best practice measures to avoid pollution to the River Glade and to ensure that the works do not impact on water quality within the river.*
- *Timing restrictions for construction works including preferred timings for vegetation clearance and for construction works to minimise impacts on birds, bats and hedgehogs.*
- *All mitigation measures listed within the Ecology Report (Table 4) to prevent impacts on designated sites, habitats and species.*
- *Toolbox talk briefing on ecological sensitivities.*
- *Procedures for unexpected wildlife encounters.*

*The development shall proceed in accordance with the approved CEMP.*

*Reason: To avoid harm to biodiversity during construction, in accordance with BS42020 Clause 10 and the Wildlife and Countryside Act 1981. To ensure contamination and pollution control in accordance with Policy DM9 of the Development Management Policies Local Development Documents (Three Rivers District Council, 2013).*

## 3. Species-Specific Conditions (Pre-Commencement)

### 3.1 Updated Surveys

*A badger walkover survey and a bat GLTA will be required prior to the start of works. The findings of the updated surveys and any changes and new mitigation strategies must be submitted to the LPA for approval before works commence.*

*Reason: To ensure baseline conditions have not changed since the ecology assessment was undertaken and ensure no unlawful disturbance occurs to protected species.*

### 3.2 Licencing

*Should evidence of a protected species be found on site, works will be stopped immediately and advice sought from a qualified ecologist. A licence from Natural England may be required prior to works commencing.*

*Reason: To ensure no unlawful disturbance to protected species.*

#### 4. Enhancement (Pre-Operation)

*Prior to the operation of the development, details of bird and bat boxes as well as hibernacula, as outlined in the Ecology Report (Page 5), shall be submitted to the LPA and approved in writing and thereafter the development should be implemented in accordance with the approved details.*

*Reason: To maximise opportunities for biodiversity.*

#### 4.1.5 Canal and River Trust: No objection

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The main issues relevant to the Trust as statutory consultee on this application are:

- a. Impact on structural integrity and users of the waterway
- b. Impact on the character and appearance of the waterway corridor
- c. Contamination
- d. Biodiversity Net Gain (BNG)

Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) is to advise that suitably worded conditions are necessary to address these matters. Our advice and comments follow:

##### *Impact on structural integrity and users of the waterway*

With any development close to the waterway there is the potential for adverse impacts on the infrastructure of the canal in terms of stability, drainage, pollution etc. It is important that development does not adversely affect the stability of the towpath and bank, as this could significantly increase the risk of damage to the adjacent canal and waterway.

As you are aware, land stability is a material planning consideration and is referred to in paragraphs 187 & 196 -197 of the NPPF, as well as being the subject of more detailed discussion in the current National Planning Practice guidance. We consider therefore that this advice and guidance clearly identifies that the planning system has a role to play in minimising the risk and effects of land stability on property, infrastructure and the public.

We appreciate that the issue of land stability can be complex and often also involves other regimes such as Building Regulations, however the NPPF is clear that planning decisions should ensure that new development is appropriate for its location in the context of avoiding unacceptable risks from land instability, and being satisfied that a site is suitable for its new use, taking account of ground conditions and land instability.

Further details on construction methodology will be required, and it will need to be ensured that the replacement bridge does not encroach further or adversely impact on the Trust's operational requirements, users of the towpath or boaters/moorers in the vicinity. This would include any impacts to navigational safety.

Accordingly, we ask that a Risk Assessment and Construction Method Statement are provided in order that the extent of the risk of such works to the stability of the waterways can be properly quantified and assessed. This detail could be secured by condition, and the Trust wish to be consulted on this detail when available.

The applicant/developer is advised that there are services and fibre optic cables within the vicinity of the site along the towpath and necessary measures should be taken to ensure that these are not adversely affected during development. Any works would also need to comply with the Canal & River Trust "Code of Practice for works affecting the Canal & River Trust." Further details on the Code can be found via our website:

<https://canalrivertrust.org.uk/businessandtrade/undertaking-works-on-our-property-and-our-code-of-practice>.

The applicant is advised to continue to liaise with Ross Fogden, Infrastructure Services Engineer ([ross.fogden@canalrivertrust.org.uk](mailto:ross.fogden@canalrivertrust.org.uk)) with regards to this and any licences, commercial agreements that may be required for oversailing, or works on, over or under Trust owned land or waterspace (during both construction and operation).

#### *Impact on the character and appearance of the waterway corridor*

This stretch of the canal corridor, whilst it passes through an urban area, does retain a landscaped character and appearance. The information submitted indicates that the proposed bridge would be the same size and in the same position as the existing and so the impacts on the waterway corridor are likely to be limited.

However, the proposed colour of the composite material to be used is not clear, with each of the drawings seeming to show a different colour. The colour choice for the proposed material could have a significant impact on the appearance of the bridge and its prominence within the landscape setting of the canal corridor. It appears that the current bridge has weathered over time, and this end result colour should be considered in the selection, rather than matching the more vibrant colour of new wood. Further information on the proposed colour finish should therefore be provided for consideration. This matter could be addressed by condition, and the Trust wish to be consulted on this detail when available.

The proposals also include the removal of the existing steps from the bridge to the towpath and the removal of 3 no. trees to facilitate the new bridge construction. The proposals to reinstate the land where the steps are to be removed are not clear, and no information has been provided regarding the replacement of the trees.

Further details on any proposed surfacing, remedial works and replacement landscaping following the removal of the steps or replacement of the bridge should be submitted for consideration. This matter could be addressed by condition, and the Trust wish to be consulted on this detail when available.

It is noted that tree protection fencing has not been specified as the harms and cost may outweigh the benefit. It will be important that those working on the bridge construction understand the potential impacts of plant and materials on the existing trees, including the risks of storing materials over Root Protection Areas.

#### *Contamination*

During our previous engagement on these plans, the applicant indicated that there may be contamination present on the site. Site investigations should be undertaken to determine the extent of this, and the outcome of these and any remediation ground reports submitted for consideration. Potential contamination of the waterway and ground water from wind blow, seepage or spillage at the site should also be avoided and details of pollution prevention measures provided. These matters could be addressed by the submission of a Construction and Environmental Management Plan (CEMP) which could be secured by condition.

The CEMP should include details as to how the safety of waterway users will be protected during any works, asbestos survey, demolition plan and dust suppression mitigation; pollution prevention and response plan; construction surface water management plan; waste management plan; construction noise management plan, etc.

This should include details as to how surface water run-off would be managed during any demolition or construction works. Works should also be carried out at appropriate times to avoid adverse impacts to nesting birds / bats etc.

#### *Biodiversity Net Gain (BNG)*

The Statutory Biodiversity Metric User Guide requires that if the site boundary of a proposed development includes land within 10m of a canal the adjacent lengths of watercourse should be included within the watercourse baseline assessment in the Metric.

Unless an exemption applies, the developer will need to deliver a minimum 10% net gain in watercourse biodiversity units. Development may also affect other habitat types on land owned by the Trust, including, but not limited to, grassland, woodland, scrubland, and hedgerows.

The River Condition Assessment (RCA) mapping does not show that the canal has been included in the assessment, but from the text, it appears that it has been included in the bank top assessment of 2 of the modules. However, as the red line extends into the riparian zone of the canal, it would be expected that it is assessed as an independent watercourse. This should be clarified with the applicant and if the ecologist has determined that the impact would not be sufficient to warrant an assessment, this should be made clear. It should be noted that no works to habitat on Trust land should take place without the Trust's prior consent.

Ecologists working on behalf of developers should obtain, and comply with, consents from the Trust to undertake any necessary habitat condition assessments and ecological surveys on our land, consistent with our Code of Practice.

The Trust may be able to assist in meeting Biodiversity Net Gain requirements (if required) by providing off-site biodiversity units. This would be subject to operational, management and commercial considerations. Should the applicant / developer wish to discuss any opportunities to secure biodiversity units on Trust land please contact [bngenquiries@canalrivertrust.org.uk](mailto:bngenquiries@canalrivertrust.org.uk)

#### *Summary*

For clarity the Trust recommend conditions are required to address the matters listed below:

##### 1) Risk Assessment and Construction Method Statement

*No development shall take place until a Risk Assessment and Construction Method Statement detailing all proposed construction works (including foundation details) has first been submitted to and agreed in writing by the Local Planning Authority. The development shall thereafter only be carried out in accordance with the agreed Method Statement and the mitigations measures identified therein.*

*Reason: In the interests of minimising the risk of any adverse impacts upon the structural integrity of the adjacent Grand Union canal, this needs to be required prior to commencement of development, and to comply with the guidance contained in Paragraphs 187 & 196-197 of the National Planning Policy Framework.*

##### 2) Materials – Council's own wording

##### 3) Landscaping –

*The development hereby approved shall proceed only in accordance with detailed landscaping plans which have been submitted to and approved in writing by the Local Planning Authority. This should include details on proposals for the reinstatement of the land*

*following removal of the existing steps to the Grand Union canal towpath and proposed / replacement trees and landscaping.*

*Reason: In the interests of the visual amenities of the Grand Union canal and biodiversity of the waterway corridor.*

#### 4) Construction and Environmental Management Plan (CEMP)

*The development (including any works of demolition / remediation) shall proceed only in strict accordance with a Construction and Environmental Management Plan which has been submitted to and approved in writing by the local planning authority and thereafter the development shall be carried out in accordance with the approved details.*

*The CEMP should include details as to how the safety of waterway users will be protected during any works, asbestos survey, demolition plan and dust suppression mitigation; pollution prevention and response plan; construction surface water management plan; waste management plan; construction noise management plan and phasing of construction activities to avoid periods of the year when sensitive wildlife could be harmed (such as when badgers, reptiles and amphibians are active and during bird nesting seasons.*

*Reason: To safeguard the environment and in the interests of the structural integrity of the waterway and to ensure the proposed works do not have any adverse impact on the safety of waterway users and the integrity of the Grand Union canal.*

Should planning permission be granted we also request that the following /informatives are appended to the decision notice:

*1) The applicant/developer is advised that there are fibre optic cables within the vicinity of the site along the footpath/towpath and necessary measures should be taken to ensure that these are not adversely affected during development. The applicant/developer is advised to continue to liaise with Ross Fogden, Infrastructure Services Engineer (ross.fogden@canalrivertrust.org.uk) on this matter and to ensure that any necessary consents are obtained and that the works comply with the Canal & River Trust "Code of Practice for Works affecting the Canal & River Trust .*

*2) The applicant is advised to contact Bernadette McNicholas of the Canal & River Trust's Estates Team (Bernadette.mcnicholas@canalrivertrust.org.uk) in order to ensure that the necessary licences or commercial agreements are obtained prior to any works being carried out on, over or under Trust owned land, including water space.*

The Trust will also need it documented that the Council would maintain the new structure.

For us to monitor effectively our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.

#### *Comments as landowner*

Part of the application site is owned by the Trust. However, we advise that no Notice appears to have been served on us by the Applicant

The applicant is advised to contact Bernadette McNicholas of the Canal & River Trust's Estates Team (Bernadette.mcnicholas@canalrivertrust.org.uk) to discuss this further and in order to ensure that the necessary licences or commercial agreements are obtained prior to any works being carried out on, over or under Trust owned land, including waterspace.

Please do not hesitate to contact me with any queries you may have.

#### 4.1.6 Batchworth Parish Council: No objection.

*BCC has no objections to the construction of the bridge provided that the agreement paperwork with the Canal and River Trust is in place prior to work starting and that a Construction Management Plan is in place as required by HCC Highways.*

## **4.2 Public/Neighbour Consultation**

- 4.2.1 Neighbours consulted: 3
- 4.2.2 Responses received: 0
- 4.2.3 Site Notice: Expired 07.11.2025.
- 4.2.4 Press Notice: Not required

## **5 Reason for Delay**

- 5.1 To allow for the technical objection raised by the EA to be addressed..

## **6 Relevant Planning Policy, Guidance and Legislation**

- 6.1 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).

### **6.2 National Planning Policy Framework and National Planning Practice Guidance**

In 2024 the new National Planning Policy Framework was published. This is read alongside the National Planning Practice Guidance (NPPG). The determination of planning applications is made mindful of Central Government advice and the Local Plan for the area. It is recognised that Local Planning Authorities must determine applications in accordance with the statutory Development Plan, unless material considerations indicate otherwise, and that the planning system does not exist to protect the private interests of one person against another. The NPPF is clear that “existing 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”.

The NPPF states that 'good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'. The NPPF retains a presumption in favour of sustainable development. This applies unless any adverse impacts of a development would 'significantly and demonstrably' outweigh the benefits.

### **6.3 The Three Rivers Local Plan**

The application has been considered against the policies of the Local Plan, including the Core Strategy (adopted October 2011), the Development Management Policies Local Development Document (adopted July 2013) and the Site Allocations Local Development Document (adopted November 2014) 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 CP1, CP9, CP10, CP11 and CP12.

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 DM2, DM6, DM8, DM9, DM13 and Appendices 2 and 5.

The Batchworth Neighbourhood Plan 2023-2038 (adopted May 2025). Relevant policies include Policies BW GB1 and BW DE1.

## 6.4 Other

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

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 2010, the Natural Environment and Rural Communities Act 2006 and the Habitat Regulations 1994 may also be relevant.

Environment Act 2021.

## 7 **Planning Analysis**

### 7.1 Impact on Green Belt

7.1.1 The application site is located within the Metropolitan Green Belt.

7.1.2 The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open and the essential characteristics of Green Belts are their openness and their permanence.

7.1.3 Paragraph 142 of the NPPF states that the Government attaches great importance to Green Belts. The essential characteristics of Green Belts are their openness and permanence.

7.1.4 Policy CP11 of the Core Strategy (adopted October 2011) sets out that there is a general presumption against inappropriate development that would not preserve the openness of the Green Belt, or which would conflict with the purposes of including land within it. Policy DM2, which relates to the construction of new buildings in the Green Belt, states approval will not be given for new buildings except in very special circumstances, or as specified in national policy and guidance.

7.1.5 For the purposes of Green Belt policy the proposed bridge is considered to be a 'building'. The NPPF does allow for exceptions to inappropriate development which includes paragraph 154 (d):

*the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*

7.1.6 Whilst the bridge would be slightly higher at its base to allow for greater clearance above the watercourse it would remain in a similar position and would be comparative in the size of the sides. Overall, it is not considered that the proposed bridge (or building for the purposes of the NPPF) would be materially larger than the one it replaces. Thus, it would be appropriate development and would not harm the openness of the Green Belt as a result. The development would therefore comply with Policy CP11 of the Core Strategy, DM2 of the Development Management Policies LDD and the NPPF.

### 7.2 Impact on the character and appearance of the host dwelling and the locality

7.2.1 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 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.

7.2.2 Policy BW DE1 sets out that new development in the Batchworth Neighbourhood Plan area shall be based upon a design-led approach to development underpinned by good practice

principles and reflecting a thorough site appraisal. Respond positively to guidance and principles established in the Batchworth Neighbourhood Design Code, including but not limited to prevailing building heights, materials, development frontages, plot widths, boundary treatments and street enclosure.

7.2.3 The proposed replacement bridge would be in a similar location and not of a discernibly increased scale to what currently exists on site. The existing bridge has been in situ a number of years and the new bridge would be of an upgraded and improved appearance. Overall, would enhance the visual amenity of this part of the locality. Notwithstanding this the proposed bridge would be made of composite/recycled plastic as opposed to plastic. The colour of the material is not overtly clear from the plans submitted and as such further details would be required by condition to ensure this is appropriate.

7.2.4 In summary it is not considered that the proposed development would result in any adverse impact on the character or appearance of the streetscene or area and the development would be acceptable in this regard in accordance with Policies CP1 and CP12 of the Core Strategy, Appendix 2 of the DMP LDD and the Batchworth Neighbourhood Plan.

### 7.3 Impact on amenity of neighbours

7.3.1 Policy CP12 of the Core Strategy states that development should 'protect residential amenities by taking into account the need for adequate levels and disposition of privacy, prospect, amenity and garden space'.

7.3.2 There are no residential neighbours within the immediate vicinity of the replacement bridge which could be adversely impacted. Therefore, the proposed development would therefore be acceptable in this regard in accordance with Policies CP1 and CP12 of the Core Strategy (adopted October 2011) and the Batchworth Neighbourhood Plan.

### 7.4 Highways & Parking

7.4.1 Core Strategy Policy CP10 requires development to provide a safe and adequate means of access and to make adequate provision for all users, including car parking. Policy DM13 and Appendix 5 of the Development Management Policies document set out parking standards.

7.4.2 The development does not impact the requirement for or the provision of parking.

7.4.3 A Construction Management Plan will be required by condition to ascertain require further details of construction access and arrangements.

7.4.4 Overall, subject to condition, it is not considered that the proposed development would result in any unacceptable harm to highway safety or parking requirements.

### 7.5 Trees & Landscape

7.5.1 Policy DM6 of the Development Management Policies LDD sets out that development proposals should seek to retain trees and other landscape and nature conservation features, and that proposals should demonstrate that trees will be safeguarded and managed during and after development in accordance with the relevant British Standards.

7.5.2 The application site is not located within a Conservation Area however in order to access the bridge for replacement and installation access would be required in close proximity to mature trees. Three trees would also be removed in order to facilitate the proposal which are set out to be low quality. A full tree protection plan would be required by condition.

### 7.6 Biodiversity

- 7.6.1 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. The Habitats Directive places a legal duty on all public bodies to have regard to the habitats directive when carrying out their functions.
- 7.6.2 The protection of biodiversity and protected species is a material planning consideration in the assessment of this application in accordance with Policy CP9 of the Core Strategy and Policy DM6 of the Development Management Policies document. National Planning Policy requires Local Authorities to ensure that a protected species survey is undertaken for applications where biodiversity may be affected prior to the determination of a planning application. A Biodiversity Checklist was submitted with the application and states that no protected species or biodiversity interests will be affected as a result of the application.

Herts Ecology have reviewed the ecology reports which have been submitted with the application. It is considered necessary for a construction environmental management plan to be secured by condition together with further bat and badger surveys. Additional details on the recommended migration measures would also be required by condition which relate to bat and bird boxes. However overall, subject to these conditions, Herts Ecology raised no objection and in turn the development would be acceptable in accordance with Policies CP1, CP9 and CP12 of the Core Strategy (adopted October 2011) and Policy DM6 of the Development Management Policies LDD (adopted July 2013).

## 7.7 Biodiversity Net Gain

- 7.7.1 Paragraph 13 of Schedule 7A of the Town and Country Planning Act 1990 sets out that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the 'biodiversity gain condition' requiring development to achieve a net gain of 10% of biodiversity value. This is subject to exemptions as set out in The Biodiversity Gain Requirements (Exemptions) Regulations 2024.
- 7.7.2 In this case a biodiversity net gain plan would be required. The application has been supported by a BNG metric and accompanying report. These have been reviewed by Herts Ecology. A Biodiversity Gain Plan (BGP) would be a post determination matter however the LPA needs to be satisfied that the gain could be achieved. In this case the mandatory gain can be achieved however the 10% gain for watercourses would require off site credits. Herts Ecology considered that the information submitted with the application is sufficient for this stage and that a BGP can be submitted post determination (prior to commencement).

## 7.8 Flood Risk

- 7.8.1 Policy DM8 of the DMP LDD sets out that development will only be permitted where it would not be subject to unacceptable risk of flooding; and would not unacceptably exacerbate risk of flooding elsewhere. Where practicable existing flood risks should be reduced.
- 7.8.2 The application site is located in Flood Zone 3b (highest risk of flooding).
- 7.8.3 The Environment Agency initially raised an objection to the proposal on the basis that the modelling data used was not clear and in any event the base height of the bridge was not considered to be high enough to account for climate change flood events. The base height of the bridge has now been raised to account for the 'worst case' flood event taking into account climate change. A mammal ledge has also been introduced. On this basis the Environment Agency have withdrawn their objections and overall the development would comply with Policy DM8 of the DMP LDD.

## 7.9 Contamination

- 7.9.1 Policy DM9 of the DMP LDD sets out the Council's expectations in respect to contamination.
- 7.9.2 The canal and river trust have also commented that further site investigations should be undertaken to determine the extent of any contamination and any remediation required as a result of the findings. A condition will be added to require further details, to this effect, be submitted.

## 8 Recommendation

8.1 That **PLANNING PERMISSION BE GRANTED** subject to conditions:

C1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In pursuance of Section 91(1) of the Town and Country Planning Act 1990 and as amended by the Planning and Compulsory Purchase Act 2004.

C2 The development hereby permitted shall be carried out and maintained in accordance with the following approved plans: QM-3339-001, QM-3339-002, QM-3339-003, QM-3339-101, QM-3339-102, QM-3339-103, QM-3339-104 and QM-3339-105

Reason: For the avoidance of doubt, in the proper interests of planning and in accordance with Policies CP1, CP9, CP10, CP11 and CP12 of the Core Strategy (adopted October 2011), Policies DM2, DM6, DM8, DM9, DM13 and Appendix 5 of the Development Management Policies LDD (adopted July 2013) and the Batchworth Neighbourhood Plan (2025).

C3 No development shall commence until a Construction Method Statement has been submitted to and approved in writing by the Local Planning Authority. Thereafter the construction of the development shall only be carried out in accordance with the approved Plan.

The Construction Management Statement shall include details of:

- a. Construction vehicle numbers, type, routing;
- b. Access arrangements to the site;
- c. Traffic management requirements
- d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);
- e. Siting and details of wheel washing facilities;
- f. Cleaning of site entrances, site tracks and the adjacent public highway;
- g. Timing of construction activities (including delivery times and removal of waste) and to avoid school pick up/drop off times;
- h. Provision of sufficient on-site parking prior to commencement of construction activities;
- i. Post construction restoration/reinstatement of the working areas and temporary access to the public highway;
- j. where works cannot be contained wholly within the site a plan should be submitted showing the site layout on the highway including extent of hoarding, pedestrian routes and remaining road width for vehicle movements;
- k. Phasing Plan.

Reason: This condition is a pre commencement condition in the interests of highway safety and convenience when considering the width of the access and Public Right of Way in accordance with Policies CP1 and CP10 of the Core Strategy (adopted October 2011) and Policy DM10 of the Development Management Policies LDD (adopted July 2013).

C4 Before any building operations above ground level hereby permitted are commenced, samples and details of the proposed external materials shall be submitted to and approved

in writing by the Local Planning Authority and no external materials shall be used other than those approved.

Reason: To prevent the structure being constructed in inappropriate materials in accordance with Policies CP1 and CP12 of the Core Strategy (adopted October 2011) and Policy DM1 and Appendix 2 of the Development Management Policies LDD (adopted July 2013).

C5 No development (including demolition) shall take place until a CEMP has been submitted to and approved in writing by the Local Planning Authority. The CEMP shall include:

- Best practice measures to avoid pollution to the River Glade and to ensure that the works do not impact on water quality within the river.
- Timing restrictions for construction works including preferred timings for vegetation clearance and for construction works to minimise impacts on birds, bats and hedgehogs.
- All mitigation measures listed within the Ecology Report (Table 4) to prevent impacts on designated sites, habitats and species.
- Toolbox talk briefing on ecological sensitivities.
- Procedures for unexpected wildlife encounters.

The development shall proceed in accordance with the approved CEMP.

Reason: To maintain wildlife habitat and to meet the requirements of Policies CP1, CP9 and CP12 of the Core Strategy (adopted October 2011) and Policy DM6 of the Development Management Policies LDD (adopted July 2013).

C6 Prior to the commencement of the development hereby permitted A badger walkover survey and a bat GLTA shall be submitted to and approved in writing by the Local Planning Authority. The findings of the updated surveys and any changes and new mitigation strategies must be submitted to the LPA for approval before works commence.

Reason: To maintain wildlife habitat and to meet the requirements of Policies CP1, CP9 and CP12 of the Core Strategy (adopted October 2011) and Policy DM6 of the Development Management Policies LDD (adopted July 2013).

C7 Prior to the commencement of the development hereby permitted further details of the Ecological Enhancements proposed within the submitted reports shall be submitted to and approved in writing by the Local Planning Authority. The measures shall be installed/provided on site prior to the first use of the bridge.

Reason: To maintain wildlife habitat and to meet the requirements of Policies CP1, CP9 and CP12 of the Core Strategy (adopted October 2011) and Policy DM6 of the Development Management Policies LDD (adopted July 2013).

C8 No operations (including tree felling, pruning, demolition works, soil moving, temporary access construction, or any other operation involving the use of motorised vehicles or construction machinery) whatsoever shall commence on site in connection with the development hereby approved until the branch structure and trunks of all trees shown to be retained and all other trees not indicated as to be removed and their root systems have been protected from any damage during site works, in accordance with a scheme designed in accordance with BS5837:2012, to be submitted to and approved in writing by the Local Planning Authority.

This shall include tree protection fencing along the full line of the construction access route.

The protective measures, including fencing, shall be undertaken in full accordance with the approved scheme before any equipment, machinery or materials are brought on to the site for the purposes of development, and shall be maintained as approved until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed within any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made. No fires shall be lit or liquids disposed of within 10.0m of an area designated as being fenced off or otherwise protected in the approved scheme.

Reason: This condition is a pre commencement condition to ensure that no development takes place until appropriate measures are taken to prevent damage being caused to trees during construction and to meet the requirements of Policies CP1 and CP12 of the Core Strategy (adopted October 2011) and Policy DM6 of the Development Management Policies LDD (adopted July 2013).

- C9 Prior to works above ground level a replacement planting scheme shall be submitted to and approved in writing by the Local Planning Authority. This shall include 5 trees to be planted as standards in close proximity to those proposed to be removed.

The replacement tree planting shall be carried out before the end of the first planting and seeding season following first occupation of any part of the buildings or completion of the development, whichever is sooner.

If any existing tree shown to be retained, or the proposed soft landscaping, are removed, die, become severely damaged or diseased within five years of the completion of development they shall be replaced with trees or shrubs of appropriate size and species in the next planting season (ie November to March inclusive).

Reasons: To meet the requirements of Policies CP1 and CP12 of the Core Strategy (adopted October 2011) and Policy DM6 of the Development Management Policies LDD (adopted July 2013).

- C10 Prior to the commencement of the development hereby permitted site investigations shall be undertaken by the relevant professional to determine the extent of any contamination, and the outcome including any required remediation reports submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved details.

Reason: To ensure that the proposed development will not cause pollution of the environment or harm to human health, in accordance with Policy CP1 of the Core Strategy (adopted October 2011) and Policy DM9 of the Development Management Policies LDD (adopted July 2013).

## 8.2 Informatives

- I1 With regard to implementing this permission, the applicant is advised as follows:

All relevant planning conditions must be discharged prior to the commencement of work. Requests to discharge conditions must be made by formal application. Fees are £145 per request (or £43 where the related permission is for extending or altering a dwellinghouse or other development in the curtilage of a dwellinghouse). Please note that requests made without the appropriate fee will be returned unanswered.

There may be a requirement for the approved development to comply with the Building Regulations. Please contact Hertfordshire Building Control (HBC) on 01438 879990 or at

buildingcontrol@hertfordshirebc.co.uk who will be happy to advise you on building control matters and will protect your interests throughout your build project by leading the compliance process. Further information is available at [www.hertfordshirebc.co.uk](http://www.hertfordshirebc.co.uk).

Community Infrastructure Levy (CIL) - Your development may be liable for CIL payments and you are advised to contact the CIL Officer for clarification with regard to this ([cil@threerivers.gov.uk](mailto:cil@threerivers.gov.uk)). If your development is CIL liable, even if you have been granted exemption from the levy, please be advised that before commencement of any works it is a requirement under Regulation 67 of The Community Infrastructure Levy Regulations 2010 (As Amended) that CIL form 6 (Commencement Notice) must be completed, returned and acknowledged by Three Rivers District Council before building works start. Failure to do so will mean you lose the right to payment by instalments (where applicable), and a surcharge will be imposed. However, please note that a Commencement Notice is not required for residential extensions IF relief has been granted.

Following the grant of planning permission by the Local Planning Authority it is accepted that new issues may arise post determination, which require modification of the approved plans. Please note that regardless of the reason for these changes, where these modifications are fundamental or substantial, a new planning application will need to be submitted. Where less substantial changes are proposed, the following options are available to applicants:

{\b (a)} Making a Non-Material Amendment

{\b (b)} Amending the conditions attached to the planning permission, including seeking to make minor material amendments (otherwise known as a section 73 application).

It is important that any modifications to a planning permission are formalised before works commence otherwise your planning permission may be unlawful and therefore could be subject to enforcement action. In addition, please be aware that changes to a development previously granted by the LPA may affect any previous Community Infrastructure Levy (CIL) owed or exemption granted by the Council. If you are in any doubt whether the new/amended development is now liable for CIL you are advised to contact the Community Infrastructure Levy Officer (01923 776611) for clarification. Information regarding CIL can be found on the Three Rivers website (<https://www.threerivers.gov.uk/services/planning/community-infrastructure-levy>).

Care should be taken during the building works hereby approved to ensure no damage occurs to the verge or footpaths during construction. Vehicles delivering materials to this development shall not override or cause damage to the public footway. Any damage will require to be made good to the satisfaction of the Council and at the applicant's expense.

Where possible, energy saving and water harvesting measures should be incorporated. Any external changes to the building which may be subsequently required should be discussed with the Council's Development Management Section prior to the commencement of work. Further information on how to incorporate changes to reduce your energy and water use is available at: <https://www.threerivers.gov.uk/services/environment-climate-emergency/home-energy-efficiency-sustainable-living#Greening%20your%20home>.

- 12 The applicant is reminded that the Control of Pollution Act 1974 stipulates that construction activity (where work is audible at the site boundary) should be restricted to 0800 to 1800 Monday to Friday, 0900 to 1300 on Saturdays and not at all on Sundays and Bank Holidays.
- 13 The Local Planning Authority has been positive and proactive in its consideration of this planning application, in line with the requirements of the National Planning Policy Framework and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015. The development maintains/improves the economic, social and environmental conditions of the District.

- 14 The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition "(the biodiversity gain condition)" that development may not begin unless:
- a) a Biodiversity Gain Plan has been submitted to the planning authority, and
  - b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be Three Rivers District Council.

Based on the information available, this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

Where the local planning authority considers that the permission falls within paragraph 19 of Schedule 7A to the Town and Country Planning Act 1990, the permission which has been granted has the effect of requiring or permitting the development to proceed in phases. The modifications in respect of the biodiversity gain condition which are set out in Part 2 of the Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations 2024 apply.

Biodiversity gain plans are required to be submitted to, and approved by, the planning authority before development may be begun, and, if subject to phased development, before each phase of development may be begun (Phase Plans).

If the onsite habitat includes irreplaceable habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans. The Biodiversity Gain Plan must include, in addition to information about steps taken or to be taken to minimise any adverse effect of the development on the habitat, information on arrangements for compensation for any impact the development has on the biodiversity of the irreplaceable habitat.

The planning authority can only approve a Biodiversity Gain Plan if satisfied that the adverse effect of the development on the biodiversity of the irreplaceable habitat is minimised and appropriate arrangements have been made for the purpose of compensating for any impact which do not include the use of biodiversity credits.

More information can be found in the Planning Practice Guidance online at <https://www.gov.uk/guidance/biodiversity-net-gain>.

- 15 The Environmental Permitting (England and Wales) Regulations 2016 require a permit or exemption to be obtained for any of the following activities:
- erecting any temporary or permanent structure in, over or under a main river, such as a culvert, outfall, weir, dam, pipe crossing, erosion protection, scaffolding or bridge
  - altering, repairing or maintaining any temporary or permanent structure in, over or under a main river, where the work could affect the flow of water in the river or affect any drainage work
  - building or altering any permanent or temporary structure designed to contain or divert flood waters from a main river

- dredging, raising or removing any material from a main river, including when you are intending to improve flow in the river or use the materials removed
- diverting or impounding the flow of water or changing the level of water in a main river
- quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- any activity within 8 metres of the bank of a main river, or 16 metres if it is a tidal main river
  - any activity within 8 metres of any flood defence structure or culvert on a main river, or 16 metres on a tidal river
  - any activity within 16 metres of a sea defence structure
- activities carried out on the floodplain of a main river, more than 8 metres from the river bank, culvert or flood defence structure (or 16 metres if it is a tidal main river), if you do not have planning permission (you do not need permission to build agricultural hay stacks, straw stacks or manure clamps in these places)

For further guidance please visit Flood risk activities: environmental permits - GOV.UK or contact our National Customer Contact Centre on 03708 506 506 (Monday to Friday, 8am to 6pm) or by emailing [enquiries@environment.agency.gov.uk](mailto:enquiries@environment.agency.gov.uk).

The applicant should not assume that a permit will automatically be forthcoming once planning permission has been granted, and we advise them to consult with us at the earliest opportunity. Advice to applicant Signing up for flood warnings

The applicant/occupants should phone Floodline on 0345 988 1188 to register for a flood warning or visit Sign up for flood warnings - GOV.UK. It's a free service that provides warnings of flooding from rivers, the sea and groundwater, direct by telephone, email, or text message. Anyone can sign up. Flood warnings can give people valuable time to prepare for flooding – time that allows them to move themselves, their families, and precious items to safety.

Flood warnings can also save lives and enable the emergency services to prepare and help communities. For practical advice on preparing for a flood, visit Prepare for flooding: Protect yourself from future flooding - GOV.UK To get help during a flood, visit What to do before or during a flood - GOV.UK For advice on what do after a flood, visit What to do after a flood - GOV.UK

16 1) The applicant/developer is advised that there are fibre optic cables within the vicinity of the site along the footpath/towpath and necessary measures should be taken to ensure that these are not adversely affected during development. The applicant/developer is advised to continue to liaise with Ross Fogden, Infrastructure Services Engineer ([ross.fogden@canalrivertrust.org.uk](mailto:ross.fogden@canalrivertrust.org.uk)) on this matter and to ensure that any necessary consents are obtained and that the works comply with the Canal & River Trust "Code of Practice for Works affecting the Canal & River Trust".

2) The applicant is advised to contact Bernadette McNicholas of the Canal & River Trust's Estates Team ([Bernadette.mcnicholas@canalrivertrust.org.uk](mailto:Bernadette.mcnicholas@canalrivertrust.org.uk)) in order to ensure that the necessary licences or commercial agreements are obtained prior to any works being carried out on, over or under Trust owned land, including waterspace.

The Trust will also need it documented that the Council would maintain the new structure.

For us to monitor effectively our role as a statutory consultee, please send me a copy of the decision notice and the requirements of any planning obligation.

Comments as landowner

Part of the Application Site is owned by the Trust. However, we advise that no Notice appears to have been served on us by the Applicant

The applicant is advised to contact Bernadette McNicholas of the Canal & River Trust's Estates Team ([Bernadette.mcnicholas@canalrivertrust.org.uk](mailto:Bernadette.mcnicholas@canalrivertrust.org.uk)) to discuss this further and in order to ensure that the necessary licences or commercial agreements are obtained prior to any works being carried out on, over or under Trust owned land, including waterspace.

Lauren Edwards  
Three Rivers District Council  
Development Control  
Three Rivers House Northway  
Rickmansworth  
Hertfordshire  
WD3 1RL

**Our ref:** NE/2025/138667/01

**Your ref:** 25/1691/FUL

**Date:** 28 October 2025

Dear Lauren,

**The Glade Bridge, Over The River Colne, Adjacent Grand Union Canal, Off Church Street, Rickmansworth, Hertfordshire**

### **Replacement of The Glade Bridge**

Thank you for consulting us on the above application on 10 October. As part of the consultation, we have reviewed the following documents:

- 9m Span Bridge Detail, for Glade Bridge, Rickmansworth, prepared by Aquamaintain, drawing no. AQM-3339-001, revision 01, dated 4 July 2025.
- BNG Metric Assessment, for The Glade, reference BNG-Project Number 6370 (no date)
- Biodiversity Checklist, signed by J. Hodges, for The Glade Bridge, dated 09 October 2025.
- Ecology Report, for The Glade, prepared by Surrey Wildlife Trust, project number 6370-A, rev. 1.0, dated 29 September 2025.
- East Elevation, for Glade Bridge, prepared by Aquamaintain, drawing no. AQM-3339-104, version 01, dated 29 September 2025.
- Existing Block Plan, for Glade Bridge, prepared by Aquamaintain, drawing no. AQM-3339-002, revision 01, dated 4 July 2025.
- Existing Location Plan, for Glade Bridge, prepared by Aquamaintain, drawing no. AQM-3339-001, revision 01, dated 4 July 2025.
- Flood Risk Assessment, for Replacement Footbridge Over The River Colne, prepared by Aquamaintain, rev. 01, no date.
- Location Plans (1:500, 1:1000 & 1:1250), for The Glade Bridge, Rickmansworth.
- South Elevation, for Glade Bridge, prepared by Aquamaintain, drawing no. AQM-3339-103, revision 01, dated 29 September.
- West Elevation, for Glade Bridge, prepared by Aquamaintain, drawing no. AQM-3339-101, revision 01, dated 4 July 2025.

### **Environment Agency Position**

Based upon a review of the submitted information, **we object** to this development on

two grounds: firstly, the application does not sufficiently restore the ecological value of the river corridor in line with national and local biodiversity policies; and second, it does not demonstrate that the proposed bridge design meets the required flood modelling standards or soffit height clearance. We therefore recommend that planning permission be refused in accordance with paragraphs 41 of the Habitat Regulations 2017, paragraphs 187 and 193 of the National Planning Policy Framework, Section 40 of the NERC Act 2006 (as amended), and The Three Rivers Local Plan Policy DM6 & DM8.

### **Objection 1: Insufficient Restoration of Ecological Value in the River Corridor**

We object to the proposed development as submitted due to its insufficient restoration of the ecological value of the river corridor, which does not align with the objectives of the River Basin Management Plan. On this basis, we recommend that planning permission be refused.

#### **Reasons**

Engineered river channels are among the most damaging interventions to ecologically valuable habitats. As a public authority, we have a responsibility to promote the restoration and enhancement of watercourses to more natural conditions wherever possible. Paragraph 41 of the Habitat Regulations 2017 recognises rivers and their banks as essential corridors for the migration, dispersal, and genetic exchange of wild species. The current bridge design restricts this function by preventing mammal passage along the river corridor.

This objection is further supported by paragraphs 187 and 193 of the National Planning Policy Framework (NPPF), which emphasise the role of the planning system in conserving and enhancing the natural environment, minimising biodiversity impacts, and delivering net gains. The Three Rivers Local Plan policy DM6 Biodiversity, Trees, Woodlands, Watercourses and Landscaping, also reinforces this by requiring development to seek opportunities for habitat connectivity with the wider landscape, improve site biodiversity, and contribute to the riparian corridor's function for migrating species. It also identifies the River Chess Valley as a key biodiversity area within the Hertfordshire Biodiversity Action Plan.

Additionally, Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, as amended by Section 102 of the Environment Act 2021, places a general duty on public authorities to conserve and enhance biodiversity through the exercise of their functions. This means we must assess how proposals within our remit could contribute to biodiversity and reflect this in our decision-making. The current proposal represents a missed opportunity to enhance biodiversity by improving riparian habitat connectivity.

The ecological value of restoration in this location is particularly high due to the presence of water voles and otters, both of which are listed as species of principal importance under Section 41 of the NERC Act 2006.

#### **Overcoming Objection 1**

To address this objection, we recommend that the bridge design be revised to include a mammal ledge, such as vegetated berms, or that the bridge abutments be

set back to allow for unobstructed animal passage beneath the structure. These measures would help restore ecological connectivity and support the movement of species along the river corridor.

## **Objection 2: Inadequate Assessment of Flood Modelling and Bridge Soffit Height**

We object to this application on the grounds that the applicant has not used the appropriate flood modelling data and has failed to meet the required soffit height for the proposed bridge structure.

This approach is inconsistent with national policy, particularly paragraphs 170 to 175 of the NPPF, which requires development to be appropriately located and designed to avoid flood risk, incorporate suitable mitigation measures, and ensure safety for its lifetime. The proposal also fails to meet the requirements of the Planning Practice Guidance on Flood Risk and Coastal Change, which emphasises the use of accurate, up-to-date modelling and appropriate design standards for infrastructure in flood-prone areas, and is in line with Three Rivers Local Policy DM8, which requires development to be safe from flooding for its lifetime, incorporate appropriate mitigation measures including minimum soffit and finished floor levels, and ensure no loss of floodplain storage through a robust compensation scheme.

### **Reason for Objection**

The applicant has proposed a soffit height of 45.8 metres Above Ordnance Datum (mAOD), based on an interpolated 1 in 100-year plus climate change flood level of approximately 44.5 mAOD. However, our current modelling indicates that the actual flood level exceeds the proposed soffit height. This discrepancy raises concerns about the adequacy of the bridge design in relation to flood risk and resilience.

### **Overcoming Objection 2**

To ensure the proposed structure is safe and compliant, the applicant must obtain and apply the correct and most up-to-date flood modelling data. This can be requested by contacting [HNLenquiries@environment-agency.gov.uk](mailto:HNLenquiries@environment-agency.gov.uk). The soffit level must be revised to ensure it is set at least 600mm above the 1 in 100-year plus climate change modelled flood height. This clearance is essential to mitigate flood risk and ensure the long-term resilience of the structure.

Furthermore, any increase in ground level or footprint within the 1 in 100-year plus climate change flood extent must be offset by an appropriate floodplain compensation scheme. This is necessary to ensure that there is no net loss in flood storage capacity, which could otherwise exacerbate flood risk in the surrounding area. The compensation scheme must be robust and demonstrate that flood storage will be maintained or improved as part of the development.

### **Please Note: Floodplain Development and Mitigation Requirements**

Please be advised that any increase in built development or raising of ground levels within the floodplain (defined as the area with a 1% annual probability of flooding, plus an allowance for climate change) will only be considered acceptable where it can be clearly demonstrated that there will be no net loss of flood storage.

The preferred method of mitigation is level-for-level and volume-for-volume compensation. This approach requires suitable land to be available on the edge of the floodplain and above the 1% annual probability flood level, including an appropriate allowance for climate change.

If it is not feasible to provide level-for-level and volume-for-volume compensation, alternative mitigation measures may be considered, subject to agreement with the Local Planning Authority (LPA). In such cases, the Flood Risk Assessment (FRA) must:

- Demonstrate that level-for-level and volume-for-volume compensation was considered;
- Provide a clear justification for why it could not be implemented; and
- Detail how the proposed alternative mitigation will minimise any associated flood risk.

If the LPA is not satisfied that the proposed alternative mitigation is appropriate, the applicant will be expected to revise their development proposals to ensure there is no increase in built footprint within the floodplain.

### **Presumption in favour of sustainable development**

We are aware that your Local Planning Authority (LPA) may currently be subject to the 'presumption in favour of sustainable development'. Given our outstanding objection on flood risk grounds we would like to highlight that in this case, as set out in National Planning Policy Framework footnote 7, the 'presumption in favour of sustainable development' should not apply as our objection provides a clear reason for refusal.

### **Informative**

Please include the below informative for any permission granted.

### **Flood Risk Activity Permit**

The Environmental Permitting (England and Wales) Regulations 2016 require a permit to be obtained for any activities which will take place:

- on or within 8 metres of a main river (16 metres if tidal)
- on or within 8 metres of a flood defence structure or culvert **including any buried elements** (16 metres if tidal)
- on or within 16 metres of a sea defence
- involving quarrying or excavation within 16 metres of any main river, flood defence (including a remote defence) or culvert
- in a floodplain more than 8 metres from the river bank, culvert or flood defence structure (16 metres if it's a tidal main river) and you don't already have planning permission.

For further guidance please visit <https://www.gov.uk/guidance/flood-risk-activities-environmental-permits> or contact our National Customer Contact Centre on 03702 422 549 or by emailing [enquiries@environment-agency.gov.uk](mailto:enquiries@environment-agency.gov.uk). The applicant should not assume that a permit will automatically be forthcoming once planning permission

has been granted, and we advise them to consult with us at the earliest opportunity.

## Advice to Local Planning Authority

### Watercourse Biodiversity Net Gain (BNG) Assessment

The submitted BNG Metric indicates that the required biodiversity units for the watercourse habitat will not be delivered. In line with the mitigation hierarchy, BNG should be delivered onsite wherever feasible, with offsite delivery considered only if onsite options are demonstrably unachievable. BNG credits should be treated as a last resort. We strongly recommend this principle is taken into account during the determination of the application.

The River Condition Assessment (Ecology Report, Appendix 3: Habitat Survey, Section 1.1.7) confirms that 0% net gain will be achieved for the river habitat. It states:

“The baseline condition of the river was moderate condition, and to achieve a net gain it would have to be enhanced to good condition. This is not considered to be a feasible achievement of the development owing to the small extent of river reach that is within the survey area, and as to in order to enhance these areas of river, catchment wide improvements would be required which are far beyond the scope of the development proposals.”

However, it is important to note that uplift in watercourse condition does not require enhancement of the entire stretch. According to the [Statutory Biodiversity Metric User Guide \(page 40\)](#), the watercourse within the red line boundary should be divided into distinct sections based on riparian characteristics such as condition and encroachment levels. Each section should be recorded as a separate line in the watercourse metric. This approach allows for more targeted enhancements and increases the feasibility of achieving the required 10% net gain onsite.

In the submitted BNG Metric, the watercourse has been recorded as a single continuous stretch, which limits the opportunity for achieving onsite net gain. We recommend that the Watercourse Metric Module be reassessed to prioritise onsite delivery.

To support condition uplift, the River Condition Assessment suggests the following enhancement measures:

- Revert over-deepening by creating vegetation-based physical features such as berms. Incorporating gravel can provide valuable breeding and sheltering habitat for fish and invertebrates, while also reducing erosion.
- Selective and rotational management of mature trees to reduce overshadowing and improve channel bed vegetation richness and extent.
- Bridge daylighting techniques to reduce artificial impacts, such as:
  - Creating small gaps in bridge structures to improve light levels along the river margins.

### Flood resistance and resilience

We strongly recommend the use of flood resistance and resilience measures. Physical barriers, raised electrical fittings, and special construction materials are just some of the ways you can help reduce flood damage.

To find out which measures will be effective for this development, please contact your building control department. If you'd like to find out more about reducing flood damage, visit the Flood Risk and Coastal Change pages of the planning practice guidance. Further guidance on flood resistance and resilience measures can also be found in:

Government guidance on flood resilient construction

<https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings>

CIRIA Code of Practice for property flood resilience

[https://www.ciria.org/CIRIA/Resources/Free\\_publications/CoP\\_for\\_PFR\\_resource.aspx](https://www.ciria.org/CIRIA/Resources/Free_publications/CoP_for_PFR_resource.aspx)

British Standard 85500 – Flood resistant and resilient construction

<https://shop.bsigroup.com/ProductDetail/?pid=000000000030299686>

### **Flood risk issues not within our direct remit**

The following issues are not within our direct remit or expertise, but nevertheless are important considerations for managing flood risk for this development. Prior to deciding this application, we recommend that consideration is given to the issues below. Where necessary, the advice of relevant experts should be sought. Adequacy of rescue or evacuation arrangements.

- Details and adequacy of an emergency plan
- Details and adequacy of flood proofing and other building level resistance and resilience measures
- Whether insurance can be gained or not
- Provision of an adequate means of surface water disposal such that flood risk on and off-site isn't increased

### **Flood warning and emergency response**

We do not normally comment on or approve the adequacy of flood emergency response procedures accompanying development proposals, as we do not carry out these roles during a flood. Our involvement with this development during an emergency will be limited to delivering flood warnings to occupants/users covered by our flood warning network. Planning Practice Guidance (PPG) states that, in determining whether a development is safe, the ability of residents and users to safely access and exit a building during a design flood and to evacuate before an extreme flood needs to be considered. One of the key considerations to ensure that any new development is safe is whether adequate flood warnings would be available to people using the development.

In all circumstances where warning and emergency response is fundamental to managing flood risk, we advise local planning authorities to formally consider the emergency planning and rescue implications of new development in making their decisions. As such, we recommend you refer to ['Flood risk emergency plans for new](#)

development and undertake appropriate consultation with your emergency planners and the emergency services to determine whether the proposals are safe in accordance with paragraph 181 of the National Planning Policy Framework and the guiding principles of the PPG.

### **Use of Sustainable Drainage Systems (SuDS)**

Support for the use of SuDS to ensure development does not increase flood risk elsewhere is set out in paragraph 181 of the National Planning Policy Framework.

Surface water run-off should be controlled as near to its source as possible through a sustainable drainage approach to surface water management (SuDS). SuDS manage surface water run-off by simulating natural drainage systems. Whereas traditional drainage approaches pipe water off-site as quickly as possible, SuDS retain water on or near to the site. As well as reducing flood risk, this promotes groundwater recharge, helps absorb diffuse pollutants, and improves water quality. Ponds, reedbeds and seasonally flooded grasslands can also be particularly attractive features within public open spaces.

SuDS involve a range of techniques including soakaways, infiltration trenches, permeable pavements, grassed swales, green roofs, ponds and wetlands. As such, virtually any development should be able to include a scheme based around these principles. In doing so, they'll provide multiple benefits and will reduce costs and maintenance needs.

Further information on SuDS can be found in:

- the CIRIA C697 document SuDS manual
- HR Wallingford SR 666 Use of SuDS in high density developments
- CIRIA C635 Designing for exceedance in urban drainage – good practice
- the Interim Code of Practice for Sustainable Drainage Systems – the Interim Code of Practice provides advice on design, adoption and maintenance issues and a full overview of other technical guidance on SuDS

### **Advice to applicant**

#### **Pre-Application Advice**

We strongly encourage applicants to seek our pre-application advice to ensure environmental opportunities are maximised and to avoid any formal objections from us. If the applicant had come to us we could have worked with them to resolve these issues prior to submitting their planning application. The applicant is welcome to seek our advice now to help them overcome our objection via [HNLustainablePlaces@environment-agency.gov.uk](mailto:HNLustainablePlaces@environment-agency.gov.uk).

Further information on our charged planning advice service is available at; <https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions>.

#### **Final comments**

Thank you for contacting us regarding the above application. Our comments are

based on our available records and the information submitted to us. Please quote our reference number in any future correspondence.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations.

In accordance with the planning practice guidance (determining a planning application, paragraph 038), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

**Lauren Clayton-Spencer**  
**Planning Advisor**

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