

Appendix 1 - 25/2168/OUT- Land Adjacent to Woodlands Cottage Consultee Comments

Wafford Rural Parish Council	1.1.1	Objection
Three Rivers Development Plans Officer	1.1.2	Comment
Herts County Council Archaeology Officer	1.1.3	No objection
London Underground	1.1.4	No objection
British Pipeline Agency	1.1.5	No objection
National Highways	1.1.6	No objection
Herts County Council Fire and Rescue	1.1.7	No objection
Three Rivers Leisure Officer	1.1.8	No objection
Herts County Council Highways Authority	1.1.9	No objection
Conservation Officer	1.1.10	Heritage harm identified
Herts County Council Minerals and Waste	1.1.11	No objection
East of England Ambulance Service	1.1.12	Comment
Three Rivers Housing Officer	1.1.13	No objection
Herts County Council Growth and Infrastructure	1.1.14	No objection
Affinity Water	1.1.15	No objection
Thames Water	1.1.16	No objection
Watford Environmental Health Officer	1.1.17	No objection
Herts and West Sussex Integrated Care Board	1.1.18	No objection
Cadent Gas	1.1.19	No objection
Watford Borough Council	1.1.20	No objection
Herts County Council Ecology	1.1.21	No objection
Three Rivers Landscape Officer (Arboricultural)	1.1.22	No objection
Herts Lead Local Flood Authority	1.1.23	No objection
Hertsmere Borough Council	1.1.24	Comment
Natural England	1.1.25	No comments received
Network Rail	1.1.26	No comments received
Designing Out Crime Officer	1.1.27	No comments received
Three Rivers Waste and Environmental Protection	1.1.28	No comments received
Environmental Health Officer	1.1.29	No comments received
Three Rivers Transport and Parking Officer	1.1.30	No comments received

1.1.1 Watford Rural Parish Council: [Objection]

Watford Rural Parish Council formally objects to the above planning application.

The Parish Council recognises the volume of technical documentation submitted in support of the proposal. However, our objection is founded on the principle of development and its incompatibility with national and local planning policy, in particular due to the site's location within the Metropolitan Green Belt and the harm that would arise to Green Belt openness, spatial integrity and the plan-led planning system.

1. Inappropriate Development in the Green Belt

The application site lies wholly within the Metropolitan Green Belt. The proposed development therefore constitutes inappropriate development, which is harmful by definition and should not be approved except in very limited circumstances.

By reason of the scale, extent and form of the development proposed, including residential buildings, access roads, parking areas, lighting, boundary treatments and associated domestic activity across the majority of the site, the proposal would result in harm to the

openness of the Green Belt, both spatially and perceptually. Approximately two-thirds of the site is proposed for built development, representing a fundamental change from open countryside to an urban residential form.

Substantial weight must be given to this harm. The Parish Council is not satisfied that the harm to the Green Belt is clearly outweighed by the benefits advanced in support of the proposal.

The development is therefore contrary to Section 13 of the National Planning Policy Framework (December 2024, as amended February 2025) and to Policies CP1 and DM2 of the Three Rivers Development Plan.

2. Rejection of “Grey Belt” Classification and Misapplication of the Golden Rules

The Parish Council does not accept that the site can reasonably be categorised as “grey belt” land.

The site:

- is not previously developed land;
- is not derelict, degraded or functionally redundant;
- forms a coherent parcel of open countryside; and
- continues to perform Green Belt purposes, including safeguarding the countryside from encroachment and preventing urban sprawl.

That the site is bounded by development on some sides does not negate its Green Belt function. Edge-of-settlement Green Belt sites frequently play a critical role in maintaining settlement boundaries and preventing incremental outward expansion.

The Parish Council further considers that reliance on the “Golden Rules” is misplaced. Affordable housing provision, design quality and sustainability measures are policy expectations and cannot be treated as exceptional circumstances capable of justifying inappropriate development in the Green Belt. The Golden Rules are intended to guide development where Green Belt release has already been justified through plan-making, not to justify speculative release through individual applications.

The proposal therefore represents an unjustified release of Green Belt land outside the Local Plan process.

3. Harm to Openness Is Not Mitigated by Landscaping or SuDS

While the application proposes areas of green infrastructure, SuDS features and landscape buffers, these are engineered and managed interventions which do not preserve the site’s existing openness. They should not be regarded as neutral in Green Belt terms or as mitigation for the loss of open land.

The change from open countryside to a developed residential environment would be permanent and irreversible.

4. Cumulative Impact and Undermining the Plan-Led System

This application must be considered in its wider context. The Oxhey Lane and Watford Heath area has experienced sustained development pressure, with multiple sites promoted or rejected through previous Local Plan processes.

Approval of this scheme would:

- materially weaken the Green Belt boundary in this location;
- set a harmful precedent for further development; and
- contribute to the incremental erosion of the Green Belt through a “salami-slicing” effect.

Such an outcome would undermine confidence in the plan-led system and prejudice the emerging Local Plan by effectively delivering strategic growth through ad-hoc decisions rather than through coordinated and democratically examined planning.

5. Additional Policy Concerns

Without prejudice to the above, the Parish Council also considers that the proposal raises further conflicts with both the National Planning Policy Framework and the Three Rivers Development Plan:

- The application is premature and conflicts with the plan-led approach required by the NPPF and Policy CP1. The release of Green Belt land is a strategic matter that should be determined through the Local Plan process, not through individual planning applications.
- The scheme relies excessively on matters being resolved at Reserved Matters stage, including biodiversity net gain delivery, detailed SuDS design, ecological mitigation, lighting impacts and layout effects on openness. The NPPF requires that outline applications demonstrate acceptability in principle, and too many core policy impacts are deferred.
- The proposal conflicts with Policy DM7 and NPPF paragraph 180 in respect of landscape and countryside protection. The development would fundamentally change the character of open countryside into suburban form, which cannot reasonably be described as conserving or enhancing landscape character.
- The site performs poorly in sustainability terms when assessed against NPPF paragraphs 108–116. The location is heavily car-dependent, accessed from a busy road, and not well related to everyday services by walking or cycling.
- The benefits relied upon by the applicant, including affordable housing provision, design quality and biodiversity enhancements, represent policy compliance rather than exceptional benefits capable of outweighing Green Belt harm.

6. Planning Balance and Conclusion

While the Parish Council notes that many technical matters have been addressed through supporting reports, the absence of technical “showstoppers” does not overcome the fundamental policy objection to inappropriate development in the Green Belt.

The Parish Council therefore considers that:

- the proposal constitutes inappropriate development in the Metropolitan Green Belt;
- it would result in unacceptable harm to Green Belt openness;

- the site has been incorrectly characterised as “grey belt” land;
- the Golden Rules have been misapplied;
- the proposal would undermine the plan-led planning system; and
- it would set a harmful precedent for further Green Belt erosion.

Watford Rural Parish Council strongly urges Three Rivers District Council to refuse planning permission for this application.

1.1.2 Three Rivers Development Plans Officer: [Comments]

Representation: The proposal relates to the development of up to 70 residential dwellings, associated access and infrastructure. The application site is located wholly within the Metropolitan Green Belt.

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

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

The site is not within a defined settlement and is not previously developed land. The development would result in the net gain of up to 70 new 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 70 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:

i. mineral extraction;

ii. engineering operations;

iii. local transport infrastructure which can demonstrate a requirement for a Green Belt location;

iv. the re-use of buildings provided that the buildings are of permanent and substantial construction;

v. material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and

vi. development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

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

a.) The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan;

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

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

d.) Where applicable the development proposed meets the 'Golden Rules' requirements set out in paragraphs 156-157

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

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”.

Whilst not located within a conservation area, the site is located in close proximity to two Listed Buildings (to the south of Oxhey Lane). Paragraph 215 of the NPPF sets out 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 including, where appropriate, securing its optimum viable use”. Policy DM3 of the Development Management Policies Local Development Document sets out that “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”.

1.1.3 Herts County Council Archaeology Officer: [No objection; conditions requested]

Please note we provided commented on the proposed development at the pre-application stage (ref. 25/0410/PREAPP) and our advice remains the same at this time: The proposed

development site lies immediately northwest of the site of the post-medieval The Clays Brickworks [Historic Environment Record no. 12734], a clay mill and brick kiln at Brickfield Farm. Immediately south is the post-medieval Grade II listed country house and gate lodge, Oxhey Grange [HER no. 13653, Listing 1101593] originally built by W. Young for W.T. Eley in the 1870s and altered throughout the 20th century. Farther afield is the site of the post-medieval Oxhey Place country house to the west [HER no. 13224] and the site of the post-medieval Carpenders Park country house and park to the south, which is believed to have replaced an early one [HER no. 13308]. To note, a Mesolithic to Neolithic flint tool findspot was identified on the northern edge of Oxhey Place [HER no. 23766].

The 1844 tithe map for Watford indicates that the location of the proposed development was at that point and through several later iterations of historic mapping was not occupied by buildings, and lies predominately within a single parcels of open land (1981). There remains the potential for some below-ground remains to survive relating brickworks or surrounding country houses, which have otherwise gone unidentified through lack of investigation on the site or the surrounding area.

Therefore, I believe that given the size and scope of the proposed development, it 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. the archaeological field evaluation of the proposed development area, via trial trenching, prior to development commencing;

such appropriate mitigation measures indicated as necessary by that evaluation. These may include: the preservation of any remains *in situ*, if warranted, appropriate archaeological excavation of any remains before any development commences on the site, with provisions for subsequent analysis and publication of results, archaeological monitoring of the groundworks of the development (also including a contingency for the preservation or further investigation of any remains then encountered), such other provisions as may be necessary to protect the archaeological interests of the site;

1. 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;

1. 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.

1.1.4 London Underground: [No objection]

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application.

1.1.5 British Pipeline Agency: [No objection]

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

Having reviewed the information provided, the BPA pipeline(s) is not affected by these proposals, and therefore BPA does not wish to make any comments on this application.

However, if any details of the works or location should change, please advise us of the amendments and we will again review this application.

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

1.1.6 National Highways: [No objection]

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 M1 Junction 5 which is 2.32 miles away from the site. The site does not share a common boundary with the SRN.

This outline application is for the construction of up to 70 residential dwellings (Use Class C3) with associated access onto Oxhey Lane and infrastructure (Appearance, Layout, Landscaping and Scale as reserved matters).

We have reviewed the Transport Statement prepared by ADC Infrastructure in November 2025 which forms a part of the planning submission.

The traffic generation assessment is based on TRICS and is considered appropriate.

The proposed development is likely to generate a total of 39 two-way vehicular trips in the AM peak (08:00 – 09:00) and 36 in the PM peak (17:00 – 18:00). We also note the location of this site and its sustainable travel connectivity.

Considering the scale of the proposed development, as well as the potential routing, we anticipate any additional vehicular trips onto the SRN during the traditional AM and PM peak hours are likely to be insignificant.

Offer No Objection – Reasons

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 2023) 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 National Highways Planning Response (NHPR 25-01) January 2025 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.

1.1.7 Herts County Council Fire and Rescue: [No objections; condition requested]

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.

1.1.8 Three Rivers Leisure Officer: [No objections; conditions requested]

After full consideration of all of the documents and information relating to the above planning application, Leisure Development Officers would recommend the following, in the submission of the planning application to Three Rivers DC.

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. Natural play features, such as those constructed from timber, are designed and built to high-quality specifications to ensure the longevity and durability of the materials used. This should include proper treatment of any timber that is installed in the ground.
 2. Consideration of play provision that incorporates all ages.
- 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.
- A RoSPA report or 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 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 grass and sports turf establishment, RoSPA assessment, ongoing maintenance and a programme of implementation.**
- (a) **The approved scheme shall be carried out in full and in accordance with the approved programme of implementation. The land shall thereafter be maintained in accordance with the scheme and made available for use in accordance with the scheme.**

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.

1.1.9 Herts County Council Highways Authority [No objection; conditions requested]

1.1.9.1 Comments dated 5 January 2026 – recommending amendments:

The site is proposed to be accessed via one new access from Oxhey Lane (A4008) in the form of a priority junction. Oxhey Lane is designated as a classified A main distributor roads, subject to a speed limit of subject 30mph and is highway maintainable at public expense. Oxhey Lane is classed as P2/M2 (multi-function road) on HCC's Place & Movement Network.

A Transport Statement (TS) has been submitted as part of the current application.

In order for Herfordshire County Council (HCC) as Highway Authority to consider the proposals acceptable from a highway and transport perspective, it is recommended that amendments and further details are provided taking into account the following points:

1. Raised Table

Whilst the intention behind the proposed raised table arrangement is acknowledged as being to match a similar arrangement at the junction of Sherwoods Road with Oxhey Lane, the design as proposed is not in accordance with the current design guidance for continuous crossovers as laid out in HCC's Place & Movement Planning and Design Guidance (PMPDG). Furthermore the proposed development of 96 dwellings to the south-east (pursuant to planning application 25/1055/FUL) is proposing a bellmouth access with no raised table nor continuous crossover. Therefore following consideration of this and the nature of the access onto a busy A road, it is recommended that the Proposed Site Access Layout plan is amended to remove the proposed raised table.

Facilities such as raised tables and continuous crossovers would however be supported within the internal layout of the site, ultimately to be submitted as part any reserved matters applications.

2. Bus Stop Improvements

An appropriate level of improvement would be expected to the two nearest bus stops (on Oxhey Lane and Pinner Road) to ensure that the proposals are in accordance with paragraphs 117a of the NPPF and policy 1 and 5 of Hertfordshire's Local Transport Plan (LTP4). The improvements required include:

- ☐ At the south bound bus stop on the northeast side of Oxhey Lane (approximately south-east of the junction with Sherwoods Road)
 - o Kassel / easy access kerbs (4 full and 2 transition kerbs)
 - o Replacement bus stop pole with a Real Time Information (RTI) pole
 - o RTI screen attached to new pole
- ☐ At the north bound bus stop on the west side of Pinner Road (close to the junction of Pinner Road with Watford Heath)
 - o Kassel / easy access kerbs (2 full and 2 transition kerbs due to limited space)
 - o RTI screen to be installed within shelter.

In this respect it is recommended that the above works are included on the overall off-site highway works / site access plan. The overall works, include the necessary bus stop improvements can then be included as part of any overall section 278 highway works, following the granting of planning permission if approved.

3. Double yellow lines indicated on the site access plan to ensure that the proposed junction is protected from any potential parked cars which could impact the safe use of the junction, required visibility splays and surrounding footways. The double yellow lines would need to be illustrated (and ultimately implemented) for at least the length of the necessary visibility splays to either side of the proposed junction.

Conclusion

Following consideration of the above points, the above details and amendments are being recommended to be provided. This is to ensure that the access proposals are acceptable and in accordance with the NPPF and LTP4.

1.1.9.2 Comments dated 4 February 2026 removing objection:

Proposal

Outline application: Construction of up to 70 residential dwellings (Use Class C3) with associated access onto Oxhey Lane and infrastructure (Appearance, Layout, Landscaping and Scale as reserved matters).

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

1. Outline Condition

No development shall commence until full details have been submitted to and approved in writing by the Local Planning Authority to illustrate the following:

a. Main internal access roads with a carriageway width of 5.5m and 2m wide pedestrian footways and designed to support a maximum 20mph speed limit and necessary visibility splays at all junctions. Any shared surface areas within the site would only be acceptable to serve upto 25 dwellings;

b. Layout and dimensions of all parking spaces and associated manoeuvring areas designed in accordance with the Place & Movement Planning and Design Guidance, Part 4, Chapter 6.

c. Turning areas and swept path analysis to illustrate that the largest anticipated vehicles to use the site (e.g. refuse vehicle) would be able to safely access the site, turn around on site and egress to the highway network in forward gear.

d. Provision for an on-site refuse/recycling store(s) within 30m of each dwelling and 25m of any collection point;

e. Turning areas and swept path analysis to illustrate that a fire tender (minimum 8.4m in length/2.9m in width for a standard fire tender and 10.1m in length / 2.9m in width for an aerial ladder appliance) would be able to safely access the site, turn around on site and egress to the highway network in forward gear. The swept path would need to illustrate that a fire tender would be able to get to within 45m of all parts of the footprint of any dwellings and be able to turn around and egress the site in forward gear, whilst also not having to reverse more than 20m. This is to ensure that the proposals are in accordance with MfS and Building Regulations 2010: Fire Safety Approved

Document B Vol 1 – Dwellinghouses (and subsequent updates).

Reason: To ensure suitable, safe and satisfactory planning and development of the site in accordance with Policy 5 of Hertfordshire's Local Transport Plan (adopted 2018).

2. A: Highway Improvements – Offsite (Design Approval)

Notwithstanding the details indicated on the submitted drawings no on-site works above slab level shall commence until a detailed scheme for the offsite highway improvement works as indicated on submitted drawing number 1632-ADC-HGN-XX-DR-CH-0100 S106 have been submitted to and approved in writing by the Local Planning Authority. The works shall include:

- Priority junction with a right hand turn lane and any associated necessary works including signage, drainage and lighting.*
- Double yellow lines on either side of the proposed junction.*
- At the south bound bus stop on the northeast side of Oxhey Lane (approximately south-east of the junction with Sherwoods Road)*
 - o Kassel / easy access kerbs (4 full and 2 transition kerbs)*
 - o Replacement bus stop pole with a Real Time Information (RTI) screen attached*
- At the north bound bus stop on the west side of Pinner Road (close to the junction of Pinner Road with Watford Heath)*
 - o Kassel / easy access kerbs (2 full and 2 transition kerbs due to limited space)*
 - o RTI screen to be installed within shelter.*
- ☐ *Construction vehicle access point*

B: Highway Improvements – Offsite (Implementation / Construction)

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

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

3. Travel Plan

Prior to the first use of the approved development an updated Travel Plan for the site shall be submitted to and approved in writing by the Local Planning Authority in consultation with the Highways Authority. The updated plan shall include:

- Interim contact to be provided until a the Travel Plan Coordinator (TPC) is appointed.*
- A secondary contact to the TPC provided along with TPC contact details.*
- Details of time allocated to the TPC role and details of where they will be based and frequency will on site.*
- Specify whether the TPC will be an employee of the developer or will the role be filled by a separate management company.*
- More measures to encourage cycling. The TP must consider Dr Bike events held on site, promotion of / incentives towards cycle training and cycle parking provision.*

- *More measures for the promotion of public transport are required.*
- *Residential track pack contribution at the value of £100 per house and / or £50 per flat in the form of bus incentives must be included. This can be organised via HCC.*
- *Once baseline data is collected, targets must be updated in an amended travel plan, and they must reflect annual targets by each mode of travel*
- *Monitoring surveys must take place on an annual basis..*
- *In a full travel plan, traffic data collection is required to (multi-modal counts) to support survey data.*
- *Amend text to state that the travel plan will be reviewed annually.*

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

4. Construction Management Plan

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

- Construction vehicle numbers, type, routing;*
- Access arrangements to the site;*
- Traffic management requirements*
- Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);*
- Siting and details of wheel washing facilities;*
- Cleaning of site entrances, site tracks and the adjacent public highway;*
- Timing of construction activities (including delivery times and removal of waste);*
- Provision of sufficient on-site parking prior to commencement of construction activities;*
- Post construction restoration/reinstatement of the working areas and any temporary access to the public highway;*

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

Informatives

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

Construction standards for works within the highway (s278 works) The applicant is advised that in order to comply with this permission it will be necessary for the developer of the site to enter into an agreement with Hertfordshire County Council as Highway Authority under Section 278 of the Highways Act 1980 to ensure the satisfactory completion of the access and associated road improvements. The construction of such works must be undertaken to the satisfaction and specification of the Highway Authority, and by a contractor who is authorised to work in the public highway. Before works commence the applicant will need to apply to the Highway Authority to obtain their permission and requirements. Further information is available via the website <https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>

AN) Roads that are to remain private: At the entrance of any new roads to remain private, the road name plate should indicate that it is a private road and the developer should put in place permanent arrangements for long-term maintenance.

AN) Estate road adoption (section 38): The applicant is advised that if it is the intention to request that Hertfordshire County Council as Highway Authority adopt any of the highways included as part of this (and subsequent reserved matters) applications as maintainable at the public expense then details of the specification, layout and alignment, width and levels of the said highways, together with all the necessary highway and drainage arrangements, including run off calculations must be submitted to the Highway Authority. No development shall commence until the details have been approved in writing and an Agreement made under Section 38 of the Highways Act 1980 is in place.

The applicant is further advised that the County Council will only consider roads for adoption where a wider public benefit can be demonstrated. The extent of adoption as public highway must be clearly illustrated on a plan. Further information is available via the County Council's website at:

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

Planning Obligations / S106 Contributions

The following 106 contributions are sought

Bus Service Contributions

106 contributions of £63,000 per annum for 5 years, which is therefore a total of £315,000 (index linked by CPI to Feb 2026). This would facilitate the funding for an improved 346 bus service, specifically to support extending the services include evenings and Sundays.

TRDC has adopted the Community Infrastructure Levy (CIL). Therefore contributions towards strategic and local transport schemes / strand 2 contributions as outlined in HCC's South West Hertfordshire Growth & Transport Plan (2019) would be sought via CIL as appropriate.

Comments / Highway Response

The site is proposed to be accessed via one new access from Oxhey Lane (A4008) in the form of a priority junction. Oxhey Lane is designated as a classified A main distributor roads, subject

to a speed limit of subject 30mph and is highway maintainable at public expense. Oxhey Lane is classed as P2/M2 (multi-function road) on HCC's Place & Movement Network.

A Transport Statement (TS), Stage 1 Road Safety Audit and Designers Response (RSA1) and Travel Plan (TP) have been submitted as part of the current application.

HCC as HA provided an initial response dated requesting amendments and additional details in respect to the proposed access / highway works. An updated plan has subsequently been submitted and will be reviewed as part of this response.

1. Access

a. Highway Works

The proposals include a new priority junction with ghost island / right hand turn lane with kerbed bellmouth access to provide vehicular and pedestrian access into the site. The access has been designed with a 5.5m wide carriageway, 6m junction radii and 2m wide footways on either side (drawing no. 1632-ADC-HGN-XX-DR-CH-0100 S1 06), which is considered to be acceptable and in accordance with HCC's Place & Movement Planning and Design Guidance (PMPDG). The levels of vehicle to vehicle visibility as shown are acceptable and sufficient when taking into account the speed limit and recorded 85th percentile speeds on the adjacent highway in Feb/Mar 2025 (34.1mph northbound and 35.6mph southbound). The illustrated visibility splays of 2.4m by 59m to either side of the junction are sufficient when taking into the recorded speeds and available through the extent of existing highway.

A swept path analysis for a refuse collection vehicle (drawing number 1632 ADC HGN XX DR CH0101) have been submitted as part of the TS to illustrate that such vehicles would be able to use the new access to enter and the exit the site safely. The details in this respect are considered to be sufficient and acceptable at this stage.

Following a previous recommendation from HCC as HA, the proposals now include double yellow lines fronting the site on Oxhey Lane running the length of the necessary visibility splays / sight lines to either side of the proposed junction. These are indicatively shown on the off-site highway works / access plan. These are deemed to be necessary to ensure that there is no adhoc vehicle parking linked to the new residential use in the interest of highway safety and capacity of the A road and footway.

A number of off-site highway works are therefore included and deemed necessary as part of the outline application. The works are indicated on drawing number 1632-ADC-HGN-XX-DR-CH-0100 S106 include:

- Priority junction with a right hand turn lane and any associated necessary works including signage, drainage and lighting.
- Double yellow lines on either side of the proposed junction.
- At the south bound bus stop on the northeast side of Oxhey Lane (approximately south-east of the junction with Sherwoods Road)
 - o Kassel / easy access kerbs (4 full and 2 transition kerbs)
 - o Replacement bus stop pole with a Real Time Information (RTI) screen attached

- At the north bound bus stop on the west side of Pinner Road (close to the junction of Pinner Road with Watford Heath)
 - o Kassel / easy access kerbs (2 full and 2 transition kerbs due to limited space)
 - o RTI screen to be installed within shelter.
- Construction vehicle access point

The proposed highways works are considered to be acceptable at this planning application stage of the proposals. The applicant would ultimately need to enter into a Section 278 Agreement with HCC as Highway Authority in relation to the technical approval of the design and implementation of the necessary works that would be needed on highway land.

Prior to applying to enter into a Section 278 Agreement with the Highway Authority, the applicant would need to submit the RSA1, albeit it is acknowledged that the highway arrangements have been amended since the initial RSA1. Please see the above conditions and informatives for more information in relation to applying for the 278.

The double yellow lines can be included as part of the 278 application and processed as part of that application, albeit the double yellow lines themselves would be secured via a separate Traffic Regulation Order.

b. Internal Site Road Layout

All matters (except the accesses from Chipperfield Road and Love Lane) have been reserved. In order to be acceptable, the necessary provisions have therefore been laid out in the suggested outline condition in this respect. It is acknowledged that section 3.18 of the TS states:

“The internal layout of the development would be subject to a reserved matters application and would be designed to the adoptable standards. Service vehicles will be able to enter, manoeuvre and exit the development in a forward gear, with the provision of appropriate turning heads. A network of footways would be provided to connect with the surrounding areas.”

It has been suggested, and indicatively shown on the masterplan, that the site would provide additional pedestrian access points onto Oxhey Lane, which would be supported by HCC as Highway Authority.

Any pedestrians and cycling provisions within the site would need to be designed in accordance with the PMPDG, Cycle Infrastructure Design: Local Transport Note 1/20 (LTN1/20) and DfT's Inclusive Mobility: A Guide to Best Practice on Access to Pedestrian and Transport Infrastructure (IM), 2021. It would be necessary for all pedestrian crossing points within the site (including when crossing any side road entrances) to provide at least pedestrian dropped kerbs or raised tables or continuous crossings where appropriate. This would also assist in encouraging lower vehicle speeds and adhere to the necessary 20mph design. Any detailed design should also avoid overlong vehicle crossovers – this is to ensure that pedestrians using any proposed footways do not have to cross in front of excessively long crossovers / dropped kerbs in the interest of pedestrian safety and accessibility. All pedestrian footways or footpaths within the site would need to be a minimum 2m wide.

The reserved matters details should also take into consideration that any shared surface areas are not currently considered acceptable for any developments (or part of developments) accessing more than 25 dwellings. Appropriate lighting and surfacing within shared surfaced areas would need to be provided to ensure that vehicles are clear that other users would also be using the space.

Swept path analysis/ tracking plans would be required to be submitted for refuse, emergency and delivery vehicles as part of the reserved matters application once the detailed internal layout has been finalised.

Any access and turning areas would need to be kept free of obstruction to ensure permanent availability and therefore consideration would need to be given to preventing vehicles parking on any turning areas and access routes. The collection method for waste collection would also need to be confirmed as acceptable by TRDC as the refuse collection authority.

The Highway Authority does not have any specific concerns in respect to access for emergency vehicles at this outline stage. As part of the reserved matters, a swept path analysis for a fire tender (8.4m in length/ 2.9m in width for a standard fire tender and 10.1m in length / 2.9m in width for an aerial ladder appliance) would need to be provided illustrate that a fire tender would be able to get to within 45m of all parts of the footprint of any dwellings and be able to turn around and egress the site in forward gear, whilst also not having to reverse more than 20m. This is to ensure that the proposals are in accordance with MfS and Building Regulations 2010: Fire Safety Approved Document B Vol 1 – Dwellinghouses (and subsequent updates).

The Highway Authority would only agree to adopt any proposed internal vehicular access routes if they are considered or demonstrated to be of utility to the wider public (which is not clear at this stage). Active travel route(s) through the site may be considered for adoption but this would be dependent on the final detailed design of the site and how such a route would link with the surrounding highway network. Nevertheless the overall works would need to be built to a design speed of 20mph and to adoptable standards to be in accordance with guidelines as documented in the P&MPDG. The developer would need to put in place a permanent arrangement for long term maintenance. At the entrance of the development, the road name plate would need to indicate that it is a private road to inform purchasers of their future maintenance liabilities.

2. Parking Level and Design

The submitted TS, 3.16 states that the level of vehicle and cycle parking would be provided in accordance with the relevant local standards. In this respect TRDC as the local planning authority for the district would ultimately need to be satisfied with the overall proposed parking levels on site taking into account their adopted standards, use class, accessibility zone and the local area.

Therefore it is recommended that TRDC are consulted separately in this respect.

The layout and dimensions of all vehicle and cycle parking spaces and associated manoeuvring areas for the development should be designed in accordance with HCC's PMPDG, Part 4, Chapter 6. The width of the parking spaces should be 2.5m by 5m for a standard space and increased to 2.7m if there is any obstruction on one side or to 2.9m if

there is an obstruction on both sides. Any proposed perpendicular parking spaces would need to be provided at a size of 6m by 2.5m to be in accordance with PMPDG.

3. Trip Generation, Distribution and Traffic Impact Assessments

a. Trip Generation & Distribution

A trip generation and distribution assessment has been included in section 4 and 5 the TS, the details of which have been based on trip rate information from the TRICS database and census data. This approach and criteria used is considered to be acceptable by HCC as Highway Authority.

Based on the TRICS database, the number of vehicular trips associated with the proposed development are estimated to be 39 two-way vehicle movements in the AM peak (0800-0900) and 36 two-way vehicle movements in the PM peak (1700-1800).

b. Junction Modelling

A junction modelling assessments has been completed for the proposed site access onto Oxhey Lane. The baseline data (trip generation and distribution) used have been taken from aforementioned TRICS and census data. A Junctions 9 assessment has then subsequently been carried out on the proposed junction to a future year of 2030 with the development, using baseline traffic data + committed developments (including traffic flows associated with those developments under consideration for planning applications 25/1055/FUL and 25/1020/OUT) and TEMPRO growth factors to 2030. The results of the modelling show that the Ratio of Flow to Capacity (RFC) at all arms of the junction are well within the generally agreed practical capacity of 0.85.

From a highways and transport perspective, HCC as HA has assessed and reviewed the capacity and modelling results from the proposals in the context of paragraph 116, National Planning Policy Framework (NPPF) (update 2024), which 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.”

4. Bus Services

The location of the two nearest bus stops to the site are within the normally required 400m walking distance from the site. Following the initial response from HCC as HA, a number of improvements are proposed to the two stops (on Oxhey Lane and Pinner Road) and considered necessary to ensure that the proposals are in accordance with paragraphs 117a of the NPPF and policy 1 and 5 of Hertfordshire's Local Transport Plan (LTP4). The improvements include:

- At the south bound bus stop on the northeast side of Oxhey Lane (approximately south-east of the junction with Sherwoods Road)
 - o Kassel / easy access kerbs (4 full and 2 transition kerbs)
 - o Replacement bus stop pole with a Real Time Information (RTI) screen attached

- At the north bound bus stop on the west side of Pinner Road (close to the junction of Pinner Road with Watford Heath)

o Kassel / easy access kerbs (2 full and 2 transition kerbs due to limited space)

o RTI screen to be installed within shelter.

The bus stops are served by service 346, which currently runs an hourly service in the day time from Monday to Saturday between Watford and Northwood, including stops at Bushey Railway Station, Carpenders Park Railway Station and close to Northwood Underground stations. There are no services in the evening or on Sundays. Following consideration of the above, an appropriate level of 106 contributions is to be sought towards improving the service. This is to ensure that the service can be provided to a level that would mean that the bus is a realistic sustainable alternative to the motor vehicle for any future residents of the site at all times and for all people.

HCC as HA would be seeking 106 contributions of £63,000 per annum for 5 years, which is therefore a total of £315,000 (index linked by CPI to Feb 2026). This would facilitate the funding for an improved 346 bus service, specifically to support extending the services including evenings and Sundays. The contributions sought are considered to be acceptable and meet the tests as outlined in the NPPF, paragraph 58 of being necessary, directly related and fair.

5. Travel Plan

A Travel Plan (TP) has been submitted as part of the application to support the promotion and maximisation of sustainable travel options to and from the site and to ensure that the proposals are

in accordance with Hertfordshire's Local Transport Plan and the National Planning Policy Framework The TP is considered to be generally acceptable for this stage of the application, subject to being updated to take into accounts the points below. taking into account the following:

- Interim contact to be provided until a the Travel Plan Coordinator (TPC) is appointed.
- A secondary contact to the TPC must be provided along with TPC contact details.
- Details of time allocated to the TPC role and details of where they will be based must be specified In the TP (how frequently will they be on site?).
- Specify whether the TPC will be an employee of the developer or will the role be filled by a separate management company.
- More measures to encourage cycling. The TP must consider Dr Bike events held on site, promotion of / incentives towards cycle training and cycle parking provision.
- More measures for the promotion of public transport are required.
- Residential track pack contribution at the value of £100 per house and / or £50 per flat in the form of bus incentives must be included. This can be organised via HCC.
- Once baseline data is collected, targets must be updated in an amended travel plan, and they must reflect annual targets by each mode of travel

- Monitoring surveys must take place on an annual basis..
- In a full travel plan, traffic data collection is required to (multi-modal counts) to support survey data.
- Amend text to state that the travel plan will be reviewed annually.

For further information or advice please see the following link

<https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-information/development-management/highways-development-management.aspx>
OR by emailing travelplan@hertfordshire.gov.uk

6. Conclusion

The acceptability of the overall proposals would be subject to the necessary additional details as outlined in the recommended conditions, planning obligations and above response - full details of which would need to be submitted and approved as part of subsequent reserved matters applications for the outline application. The applicant would also ultimately need to enter into a Section 278 Agreement with HCC to cover the technical approval of the design, construction and implementation of the necessary highway and access works. Therefore HCC as Highway Authority would not wish to object to the granting of the outline planning application, subject to the inclusion of the above planning conditions, obligations and informatives.

1.1.9.3 **Additional comments received 2 June 2026 confirming bus service contributions following questions raised by agent regarding reasonableness of this provision:**

As referred to in the full Highway Authority response dated 04/02/2026, HCC as Highway Authority would be seeking 106 contributions of £315,000 (index linked to Feb 2026). This is identified as funding an improved 346 bus service, more specifically to support extending the services to include evenings and Sundays.

The figure requested has been calculated using data from the bus service team at HCC as to the level of funding that would be required to improve the aforementioned bus service (£63,000 per annum for 5 years). The figure is also checked against the “contribution per dwelling” figure from HCC's Guide to using HCC's Guide to Developer Contributions, specifically appendix Technical Appendix 1: Transport in respect to an appropriate level of contributions per dwelling. The headline figure is £9,861 per dwelling (index linked to March 2024) and therefore it is noted the potential figure that could be sought for this site (if deemed necessary to improve the bus service to a sufficient level) would be £690,270 (index linked to Mar 2024). It is noted that the figure formally requested for this application is substantially less than this figure and therefore the figure requested is deemed to meet the fair and reasonableness test in this respect.

Reference is made to the modal split of trips with 2.6% of trips being made by bus as being a reason to argue against bus service contributions (calculated using 2011 census data).

Paragraph 109 of the National Planning Policy Framework (NPPF), 2024 states that transport issues should be considered using a vision-led approach to identify transport solutions and that should involve “identifying and pursuing opportunities to promote walking, cycling and public transport use”. The improved bus service provision would therefore be in accordance with such a vision led approach by promoting the use of public transport (e.g. bus or combination bus/train journeys) and reducing the reliance on the private motor vehicle (and

accordingly reducing the proportion of car trips, which aligns with Hertfordshire's Local Transport Plan and the NPPF).

Paragraph 115b of the NPPF states that application for developments should ensure that "safe and suitable access to the site can be achieved for all users". Not all future residents or visitors of the proposed site would be able to walk or cycle the necessary distances to the nearest railway station or other amenities and therefore would be reliant on such a bus service. Even with the 2.6% of trips figure, such users would still need access to a bus service that is convenient and frequent (including in evenings and on all days). Indeed this would also link to paragraph 117 of the NPPF, which states that application for development should facilitate access to "high quality public transport....., and appropriate facilities that encourage public transport".

Therefore following consideration of the aforementioned points, the type and level of contribution that is being sought is deemed to be acceptable and in accordance with the necessary tests as laid out in the CIL regulations and paragraph 58 of the NPPF as being:

1. necessary to make the development acceptable in planning terms;
2. directly related to the development; and
3. fairly and reasonably related in scale and kind to the development.

Every planning application has to be assessed on its own merits. I note that reference is made to application 25/1055/FUL - the proposals subject to that application include a significant amount of off-site sustainable travel infrastructure, which would therefore be deemed as essentially being strand 1 / necessary infrastructure works. In this context any level of off-site highway works has to be considered taking into account whether or not an additional 106 contribution would meet the CIL test 3 of being fair and reasonable. It should also be noted that application 25/2168/OUT would also benefit from the aforementioned infrastructure if that site comes forward and completed.

1.1.10 Three Rivers Conservation Officer: [Heritage harm identified]

The application is for Outline application: Construction of up to 70 residential dwellings (Use Class C3) with associated access onto Oxhey Lane and infrastructure (Appearance, Layout, Landscaping and Scale as reserved matters).

This application follows previous pre-application discussions.

There are no heritage assets, either designated or non-designated on the application site (the Site) and the Heritage Statement has identified three heritage assets for assessment:

- Oxhey Grange (Grade II, List Entry Number 1101593)
- Oxhey Grange Lodge (Grade II, List Entry Number 1174337)
- Watford Heath Conservation Area

Oxhey Grange was built in the late nineteenth century and extended in 1908. The grounds of the house were to the western side of the A4008 road, and it is screened on all sides by mature woodland and is set well away from the A4008. The Heritage Statement states that due to the lack of physical, visual and historical connection with the Site, that the Site does not contribute to the significance of Oxhey Grange. It is agreed that the Site only makes a limited contribution to Oxhey Grange itself in terms of setting, due to the physical separation of the two, and the main open setting of Oxhey Grange being woodland to the south and west.

Oxhey Grange Lodge was built in 1908 along with the extension to the house and is set approximately 100m to the northeast of the Grange, close to the A4008. The Heritage Statement states that the main setting of the Lodge is Oxhey Grange itself, that there is no historic or functional connection with the Site and that the Site does not contribute to the significance of the Lodge. However, while acknowledging these points, the Site still makes an important contribution to the understanding of the Lodge as a building set in open countryside historically, particularly as the Site is now the only visible area of open space visible in shared public views. On this basis, development at the Site has the potential to impact the significance of the Lodge and Oxhey Grange itself to a lesser extent due to its historic connection to the Lodge.

In relation to Watford Heath Conservation Area, this is outside the Three Rivers DC boundary and is located within Watford BC. The submitted Heritage Statement notes that the Site makes a limited contribution to the character and once rural setting of the Conservation Area.

The outline application has been submitted with a detailed Design Code. This has provided several key measures which would limit impact on heritage assets. The access point would be towards the north of the Site, away from the Lodge. Built footprint would be set well back from the road, particularly adjacent to the Lodge, with appropriate building heights and sensitive design, influenced by the local vernacular for the zone nearest to the road. In addition, there is a green corridor to the front/west with appropriate boundary treatments including native hedgerows, timber bollards and chain or estate railings with no timber fencing to be used on rear boundaries facing the public realm.

The design and mitigation points are all acknowledged and based on the quantum of development provided, the scheme appears to have proposed a high level of mitigation. If officers are minded to grant permission, the Design Code should be secured as an approved document if appropriate in planning terms.

However, due to the visual openness of the Site, it is unlikely that the harm to the Lodge caused by this quantum of development could be fully mitigated. Overall, the proposal would result in a lower degree of less than substantial harm to the significance of the Lodge but would have a neutral impact on Oxhey Grange itself.

This response has been made with regard to Sections 66 (1) and 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act and Chapter 16 of the National Planning Policy Framework (NPPF). It is noted that in the NPPF para 215, less than substantial harm should be weighed against public benefits which may in this instance include the housing provision.

1.1.11 Herts County Council Minerals and Waste Department: [no objection: conditions requested]

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

Minerals

In relation to minerals, the site falls entirely within the 'Sand and Gravel Belt' as identified in Hertfordshire County Council's adopted Minerals Local Plan 2002 – 2016. The Sand and Gravel Belt is a geological area that spans across the southern part of the county and contains the most concentrated deposits of sand and gravel throughout Hertfordshire.

Whilst the site falls within the Sand and Gravel Belt, British Geological Survey (BGS) data does not identify any potential superficial sand/gravel deposits beneath the application site. Given the lack of deposits beneath the site, the Minerals Planning Authority does not have any mineral sterilisation concerns.

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

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

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

- the likely impact of proposed, non- waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;*
- new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service;*
- the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.'*

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

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

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

As a minimum, the SWMP should include the following:

Project and People

- Identification of the client
- Identification of the Principal Contractor
- Identification of the person who drafted the SWMP
- Location of the site
- An estimated cost of the project
- Declaration that the client and contractor will comply with the requirements of Duty of care that materials will be handled efficiently and waste managed appropriately (Section 34 of Environmental Protection Act 1990 and Environmental Protection (Duty of Care) Regs 1991)

Estimating Waste

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

Space for Later Recordings

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

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

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

development shall be carried out in accordance with the approved SWMP. **County of opportunity**

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

1.1.12 East of England Ambulance Service NHS Trust: [No objection: monetary contribution requested]

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

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

Impact of the Development on Ambulance Services

The proposed 70 dwelling development is expected to generate an additional **154 residents**, based on the local authority average of **2.2 persons per dwelling**. Using EEAST's established and standardised population-based activity model, this population uplift is forecast to generate **35 additional emergency calls per year**.

This represents an **5.1% increase in annual activity** arising from this development when compared to current incident levels in the WD195 area (1,185 incidents between 1 April 2024 – 31 March 2025).

This level of additional activity directly increases:

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

Existing Capacity Constraints

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

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

- **Existing GIA:** 793m²
- **Modern Hub requirement:** 2,200m²
- **GIA Deficit:** 1,407m²

Harlow Hub provision needs to support approximately 40 Dual-Staffed Ambulances and 4 Rapid Response Vehicles, yet it currently accommodates only 30 vehicles. Increased population growth in the catchment area will further intensify this shortfall.

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

Legal and Policy Basis for Mitigation

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

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

The requested contribution meets all three tests.

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

No Dwellings	Infrastructure Cost*	Total
70	£340	£23,800

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

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

$6.1m/1.4m = 0.23$ incidents per person per annum

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

Estates build per m² (£213.50)

Cost of emergency ambulance vehicles (£126.50)

The capital required to create additional ambulance services to support the population arising from the proposed development is calculated to be **£23,800** and are for the impact of this development only and will be used to support:

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

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

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

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

Defibrillators

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

Comments on Development Proposal

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

Health and Wellbeing Scheme Design Measures

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

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

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

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

Ideally EEAST recommends Passivhaus/BREEAM Excellent standard is used for all housing and where appropriate, commercial buildings. This would also support the council in delivering their sustainability/green plans. As a minimum EEAST recommends the proposed 40% affordable/social housing are built to Passivhaus or BREEAM Excellent standards, as this

would provide significantly long-term environmental savings for residents who are more likely to be from the most deprived backgrounds or have limited disposable income.

Flood Assessments

EEAST notes the site is within Flood Zone 1 with a small section of Flood Zone 2 & 3 is shown encroaching slightly into the north-eastern corner of the site.

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

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

In Flood Zones 2 and 3 EEAST request the appropriate the use of swales and other drainage measures to absorb any flood waters and would urge developers ensure measures are taken to minimise the risk of flooding in surrounding areas as well as flood proofing homes, garages and other infrastructure.

Transport, Design and Access

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

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

1.1.13 Three Rivers Housing Officer: [No objection]

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

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.

Whilst it is positive that the supporting statement indicates that up to 50% of this development is to be affordable and a tenure split of 70% social rent and 30% shared ownership, the application does not provide a detailed affordable housing schedule. In particular, there is no breakdown by unit size and tenure, nor confirmation of the proportion of family-sized homes to be delivered within each tenure. In the absence of this information, it is not possible to fully assess compliance with Policy CP4 or to determine whether the scheme would adequately address identified local housing needs.

- 1.1.14 Herts County Council Growth and Infrastructure: [No objection; Monetary contribution required]

Response by HCC's Growth & Infrastructure Unit to 25/2168/OUT

Land Adjacent Woodlands Cottages Oxhey Lane Carpenders Park

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 **70 dwellings** we would seek financial contributions towards the following projects:

HOUSES		
Number of Bedrooms	A) Open Market & Shared Ownership	B) Affordable Rent
1	0	0
2	3	6
3	16	8
4+	11	1
Total	30	15

FLATS		
Number of Bedrooms	A) Open Market & Shared Ownership	B) Affordable Rent
1	8	5
2	7	5
3	0	0
4+	0	0
Total	15	10

Trajectory						
Year	2025	2026	2027	2028	2029	2030
Units	0	0	35	35	0	0

Secondary Education Contribution towards the delivery of a new secondary school at Carpenter's Park and/or provision serving the development (£620,243 (which includes land costs of £12,553) index linked to BCIS 1Q2024 and BCIS Regional Factor)

Special Educational Needs and Disabilities (SEND) Contribution towards the delivery of new Severe Learning Difficulty (SLD) special school places (WEST) and/or provision serving the development (£104,419 index linked to BCIS 1Q2024 and BCIS Regional Factor)

Waste Service Transfer Station Contribution towards increasing capacity at Waterdale Transfer Station and/or provision serving the development (£7,614 index linked to BCIS 1Q2024)

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

The CIL Regulations discourage the use of formulae to calculate contributions however, the County Council is not able to adopt a CIL charge itself. Accordingly, in areas where a CIL charge has not been introduced to date, planning obligations in their restricted form are the only route to address the impact of a development. In instances where a development is not

large enough to require on site provision but is large enough to generate an impact on a particular service, an evidenced mechanism is needed to form the basis of any planning obligation sought. HCC views the calculations and figures set out within the Guide to Developer Infrastructure Contributions as an appropriate methodology for the obligations

sought in this instance.

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

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

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

Justification

The above figures have been calculated using the amounts and approach set out within the Guide to Developer Infrastructure Contributions Hertfordshire County Council's requirements) document, which was approved by Hertfordshire County Council's Cabinet 12 July 2021 and is available via the following link: [Planning obligations and developer infrastructure contributions | Hertfordshire County Council](#) In respect of Regulation 122 of the CIL Regulations 2010 (amended 2019), the planning obligations sought from this proposal are:

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

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

The development plan background supports the provision of planning contributions.

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

(ii) Directly related to the development.

The occupiers of new residential developments will have an additional impact upon local services. The financial contributions sought towards the above services are based on the size, type and tenure of the individual dwellings comprising this development following consultation

with the Service providers and will only be used towards services and facilities serving the locality of the proposed development and therefore, for the benefit of the development's occupants.

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

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

PLEASE NOTE THE FOLLOWING:

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

I would be grateful if you would keep me informed about the progress of this application so that either instruction for a planning obligation can be given promptly if your authority is minded to grant consent or, in the event of an appeal, information can be submitted in support of the requested financial contributions and provisions.

Should you require any further information please contact the Growth & Infrastructure Unit.

1.1.15 Affinity Water: [No objection; Conditions requested]

Thank you for your notification of this planning application. These are referred to our team where our input on issues relating to groundwater impact may be required. For water supply, infrastructure protection and mains diversions please get in contact with our Developer Services Team via the "My Developments Portal" <https://affinitywater.custhelp.com/> or aw_developerservices@custhelp.com at the earliest opportunity to avoid delays.

You should be aware that the proposed development site is located within an Environment Agency defined groundwater Source Protection Zone (SPZ) which corresponds to our abstraction boreholes (EAST) 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 plan prior to the intrusive ground investigation, agreed with Affinity Water to ensure all concerns will be covered.

- 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.

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

Contamination during construction:

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

Condition 2

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

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

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

Contamination through Surface Water Drainage:

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

Condition 3

Prior to the commencement of development, 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 final 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.

1.1.16 Thames Water: [No objection; conditions requested]

Waste Comments:

Waste Comments: Following initial investigations, Thames Water has identified an inability of the existing SEWAGE TREATMENT WORKS infrastructure to accommodate the needs of this development proposal. As such Thames Water request the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- all sewage works upgrades required to accommodate the additional flows from the development have been completed; or - a development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason – Sewage Treatment Upgrades are likely to be required to accommodate the proposed development. Any upgrade works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. Should the

Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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: "A 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.

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

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

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. For your information the address to write to is - Affinity Water Company The Hub, Tamblin Way, Hatfield, Herts, AL10 9EZ - Tel - 0845 782 3333.

1.1.17 Watford Environmental Health Officer: [No objection; conditions requested]

I have reviewed the air quality report (Report Ref 2407460-ACE-XX-00-RP-C-0801_B (November 2025) and accept the findings that the development should have negligible impact on air quality and would not require any further information. I have only considered this for long term exposure post development. The construction phase, dust etc should be considered by TRDC Environmental Health Team.

The Contaminated Land Report (PRELIMINARY RISK ASSESSMENT OXHEY LANE THREE RIVERS KEBBELL DEVELOPMENT LTD PRA-25030-24-459 NOVEMBER 2025)

States:

The identified potential contaminant linkages will require intrusive site investigation to obtain more information and to undertake a Tier 2 generic quantitative risk assessment. The investigation should include:

- 1) Exploratory holes targeted to the former structure to determine whether any made ground is present and the chemical quality of soils;
- 2) Ground gas monitoring is recommended along the southeastern boundary to confirm the cohesive nature of the geology and whether there is any evidence for ground gas from the off-site source
- 3) Basic confirmatory testing of site soils is recommended;

4) Investigation will also be required for geotechnical design purposes.

Having reviewed the submitted report we would agree that it is appropriate for the intrusive investigation to be carried out following granting of planning consent and would require a completed assessment as detailed above to be secured by a suitable planning condition if permission is to be granted.

1.1.18 Hertfordshire and West Essex Integrated Care Board: [No objection; Contribution requested]

Location: Land Adjacent Woodlands Cottages Oxhey Lane Carpenders Park

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

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

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

The HWE ICB works in partnership with health providers, local authorities, and other organisations to: Dr Jane Halpin, Chief Executive Rt. Hon. Paul Burstow, Chair

- 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 Carpenders Park and South Oxhey. This scheme is expected to deliver 70 homes, which based on an average occupancy of 2.4 will create circa **168 new patients**.

These new residents will impact on several practices and PCNs. It is difficult to analyse capacity on PCN level because there is no geographical alignment as most practices belong to different PCNs. Therefore, capacity analysis on surgery and settlement level is more appropriate:

				Settlement level		
Surgery Name	Settlement/ Area	PCN	Number of patients capacity/ constraint relative to 18 per m2	Number of patients capacity/ constraint	Total NIA capacity/ shortfall	Capital impact of existing capacity/ shortfall
South Oxhey Surgery	South Oxhey/ Carpenders Park	MVPS	-1,840	-5,397	-300	£2,098,697
Pathfinder		MVPS	-1,487			
The Consulting Rooms		Alliance	-974			
Attenborough Surgery (Carpenders Park)		Attenborough	-1,095			

*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 all surgeries are at capacity and their ability to accept additional patients is limited. The closest practice to the proposed development is Attenborough Surgery branch in Carpenders Park. Even though a small extension was built in 2019, they are still high in terms of patients per m2. The nearby Pathfinder and South Oxhey Surgery are based in the NHS Property Services owned South Oxhey Clinic, which is a 1970s single storey building. Both practices are operating at capacity as can be seen from the table above. There have been several initiatives in the past 15-20 years to incorporate South Oxhey Clinic in the wider South Oxhey regeneration plan, in partnership with HCC and TRDC. Unfortunately, these initiatives have not been fruitful. Notwithstanding recent internal refurbishment, a need for a contemporary health facility in South Oxhey, medium to long term, remains.

In light of the above, it is evident that the existing provision would not be able to accommodate the additional patient numbers arising from this development, and indeed potential future housing growth in and around the vicinity of Carpenders Park and South Oxhey.

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 take into account any existing deficiencies or shortfalls in Carpenders Park and South Oxhey, or other development proposals in the area.

The proposed development would deliver 70 dwellings, which based on an average occupancy of 2.4 occupants per dwelling will create circa **168 new patient registrations**.

168 new patient registrations/2000 = 0.084 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"

$0.084 \times 199 \text{ m}^2 = 16.716\text{m}^2$ of additional space required

$16.716\text{m}^2 \times £7,000^* \text{ per m}^2 = £117,012$ (*Build cost; includes fit out and fees)

$£117,012 / 70 = £1,671.60$ per dwelling (rounded up to £1,672 per dwelling)

Total GMS monies requested: 70 x dwellings x £1,672 per dwelling = £117,040 (indexed from the date of the planning permission)

The HWE ICB requests that the financial contribution that the HWE ICB is seeking, to mitigate the health impacts from this development is 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. Please note, the developer contribution figure referred to in this response is a calculation only and that the final payment will be based on the actual dwelling unit mix and the inclusion of indexation.

If planning permission is granted, the HWE ICB propose to focus Section 106 monies on additional primary care premises capacity in South Oxhey and/or Carpenders Park or any other provision serving the development.

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

i ***Necessary to make the development acceptable in planning terms.*** The provision of community facilities including health is a material planning consideration. As explained above, a financial contribution has been sought to mitigate the primary health service impacts arising from this development, by creating additional primary care premises capacity

ii ***Directly related to the development.*** The new residents of the development will have an additional impact upon local health services. The financial contribution will be used towards additional facilities in the vicinity of the development. As such the contribution will be used for the benefit of the new residents.

iii ***Fairly and reasonably related in scale and kind to the development.*** The above financial contribution has been calculated based on 70 new dwellings and 168 new patients, to mitigate the primary health service impacts arising from this development.

With regards to the HWE ICB's own governance and scrutiny processes, please note:

All projects are subject to Full Business Case approval by the HWE ICB and NHS England.

A project identified and costed in response to the planning application may not meet the objectives of 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.

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

1.1.19 Cadent Gas: [No objection]

After receiving the details of your planning application, we have completed our assessment. We have **no objection in principle** to your proposal from a planning perspective.

Cadent will need to be contacted prior to any works taking place, to trace and markup the HP asset.

Easement and BPD distances will be set out and must be adhered to.

Trial holes will be required to pinpoint the pipeline position and depth.

We have a 762 mm ST HP high pressure pipeline in the works area, which will need to be protected at all times this has an easement in place with BPD distance that must not be encroached upon, nothing to be built on or placed/stored on or over the pipeline or in the easement for any assets in the works area.

No excavation within 3m of the HP pipeline as per SSW22.

No plant to cross the pipeline without crossing points being agreed on with Cadent

Please be aware that access to the Pipelines will be always required in the event of an emergency or operational maintenance needs.

Any damage or any action that puts the pipeline at risk will be reportable to the HSE.

Please refer to MAHP and the BPD noted below.

Please review our attached plans, which detail the Cadent gas asset/s in the area. If your application affects one of our high- pressure pipelines, it is a statutory requirement that you input the details into the HSE's Planning Advice Web App. For further details, visit www.hse.gov.uk/landuseplanning/planning-advice-web-app.htm

The HSE may wish to apply more stringent criteria for building proximity after assessment. Please ensure that you formally consult with them before you proceed.

In order to help prevent damage to our asset/s, 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. Prior to carrying out works, please register on www.linesearchbeforeudig.co.uk to submit details of the planned works for review, ensuring requirements are adhered to.

The original holding objection was triggered due to the presence of a High-Pressure Major Accident Hazard Pipeline (MAHP) and/or an Intermediate Pressure Pipeline and/or an Above Ground Installation.

The minimum building proximity distance (BPD) for the pipelines and associated installations is as follows:

- Specific MAHP BPD (15.3 METERS MIN) this only a guide and the exact BPD can be larger.
- Specific IP BPD (3 METERS MIN)
- Specific AGI BPD (based upon the hazardous area zoning) 10 METERS MIN

The building proximity distance taken from The Institution of Gas Engineers and Managers publication IGEM/TD/1 Edition 5 which is the standard applicable to steel pipelines and associated installations for high pressure gas transmission and IGEM/TD/3 Edition 5 Steel and PE pipelines for gas distribution

Your responsibilities and obligations

This letter does not constitute any formal agreement or consent for any proposed development work either generally or related to Cadent easements or other rights, or any planning or building regulations applications.

Cadent Gas Ltd or their agents, servants or contractors do not accept any liability for any losses arising under or in connection with this information. This limit on liability applies to all and any claims in contract, tort (including negligence), misrepresentation (excluding fraudulent misrepresentation), breach of statutory duty or otherwise. This limit on liability does not exclude or restrict liability were prohibited by the law nor does it supersede the express terms of any related agreements.

If you need any further information or have any questions about the outcome, please contact us at box.eaplantprotectionops@cadentgas.com / quoting your reference at the top of this letter.

1.1.20 Watford Borough Council: [Comment]

Thank you for the opportunity to comment on this application. The site is adjacent to Watford's borough boundary to the North and West and it is located within land designated as Green Belt.

The site was assessed within the Watford and Three Rivers Stage 2 Green Belt Assessment (2019) as part of parcel 'WE7' which includes the proposal site and the area to the east of the A4008.

This Green Belt Assessment concluded that a 'moderate high' overall harm to Green Belt Purposes would result from the release of this land. Specifically, the release of land would have a 'relatively significant' impact in relation to purpose 2 (preventing neighbouring towns from merging into each other) and purpose 3 (assist in safeguarding the countryside from encroachment). There would also be a 'moderate' impact on purpose 1 (check the unrestricted sprawl of large built up areas).

In response to the potential allocation of this site within the emerging Three Rivers Local Plan, Watford Borough Council raised concerns in 2018 and 2019 and did not support the sites allocation. It is noted that the site has been subsequently excluded from proposed allocation in the latest 2023 Reg 18 version of the Three Rivers Local Plan due to its moderate high impact on Green Belt purposes; a decision that was supported by Watford Borough Council in its representation dated 4/10/2023.

The Council continues to consider that the loss of green belt in this area, either individually or collectively would compromise the separation of Watford (Watford Heath area) and Carpenders Park.

It is acknowledged however, that the policy landscape has changed in relation to Green Belt over the past 12 months, especially through the introduction of Grey Belt. Grey Belt is land within the Green Belt that does not strongly contribute to purposes a, b or d of the Green Belt purposes as set out in para 143 of the NPPF¹. In considering this application, a detailed and robust analysis should be done to determine whether this site would be Grey Belt. If it was considered to be Grey Belt then the scheme would need to be determined in accordance with Paragraphs 155 and 156 of the NPPF.

The Council hope that these comments are useful. Please do not hesitate to contact us if there are any questions regarding this response.

1.1.21 Herts County Council Ecology: [No Objection]

1.1.21.1 **Comments and recommended Conditions and Informatives:**

Having reviewed the documents associated with this application, the following information is required in order for the Hertfordshire LEADS Ecology team to reach an informed judgement on the impact of the proposed works:

Great Crested Newts - The Ecological Impact Assessment (EIA) report (November 2025) states that there are 5 ponds within 250m of the site, two of which could not be surveyed (Ponds 2 and 5) to assess their suitability as Great Crested Newt (GCN) habitat. Although the

location of these ponds is stated as being shown in Figure 6, this figure has not been provided and so it is not possible to advise the LPA as to the significance of their location. However, it is noted that the report stated that all but one pond to the southwest of the site have good connectivity to the site. No account seems to have been made in the impact assessment for the potential for GCN being present in the ponds that could not be accessed.

A Habitat Suitability Index assessment was carried out on the three accessible ponds - Ponds 1, 3, and 4, which were found to be below Poor, Average and Below Average suitability for GCN respectively. Further, an eDNA survey to determine GCN presence was carried out on Pond 1 only as Ponds 3 and 4 were dry at time of surveying. The report states that this survey returned a negative result; However, the full results are referenced as being in Appendix 5, which has not been included in the report. As a protected species, the LPA must be satisfied over the likely presence/absence of GCN at the site, particularly considering that there are 16 records of GCN which overlap the site boundary, as stated in the EIA report. Therefore, I would recommend that the LPA request the missing results for the eDNA survey carried out and, unless exceptional circumstances mean that access to Ponds 2 and 5 cannot be gained, for Ponds 2 and 5 to be surveyed to ascertain their suitability for GCN and subsequently any eDNA surveys to determine GCN presence/absence to be carried out if required. In the event that access to Ponds 2 and 5 is not possible, given the proximity of records of GCN, then the precautionary principle should be applied. In this case this might be by the application for a DLL licence, in which case the applicant will need to submit a completed impact assessment and **conservation payment certificate (an IACPC) signed by Natural England** confirming the suitability of the site for the scheme to the LPA prior to determination.

1. **Bats (Ground Level Tree Assessment)** - The EIA report states that a Ground Level Tree Assessment (GLTA) was carried out on 16th September 2024 to assess the potential of the trees on-site for bat roosting. However, the results of the GLTA have not been provided in either the main body of the report or the appendices. The Arboricultural Implications Report (November 2025) makes clear that several of the trees on-site are planned for removal, including a number of which that are stated to have features such as dieback (e.g. Tree 12, Tree 13), which may render them more likely to have the potential to support roosting bats. Furthermore, the results of the Night-time Bat Walkovers undertaken in October 2024, April 2025 and June 2025 indicated that the site is being used by at least three species or groups of bats, as stated in the EIA. Whilst we acknowledge that the Arboricultural Implications Report states that none of the trees to be removed are mature specimens (which are more likely to have the potential to support roosting bats), without the results of the GLTA, the potential of the trees on-site to support roosting bats is unclear and the LPA cannot scrutinise these results against the trees to be removed nor be forewarned of any possible impact on bats should the plans regarding the removal of trees on-site be changed. As such, I would recommend that the LPA request the results of the GLTA from the applicant.

1. **Tree Preservation Order** - The Arboricultural Implications Report states that there are three trees on-site covered by a Tree Preservation Order (TPO), but that "two trees within the site shown to be protected under this TPO were not present at the time of the survey", implying that two trees under a TPO on the site have been removed. Considering the protections granted by a TPO, I would recommend that the LPA make enquires with the applicant to ascertain 1) whether the two trees in question were removed subject to a planning application, and if so, 2) whether this application was granted prior to 25th August 2023. If these trees

were removed in connection with planning approval granted after 25th August 2023, this loss needs to be accounted for in the BNG metric calculations for this application.

Without the above information, we are unable to reach an informed judgement on the application and would therefore request re-consultation following the submission of the above information.

1.1.21.2 Comments received 22 May 2026 sustaining objection:

Comments and recommended Conditions and Informatives:

Protected species

In our previous response to this application, the Hertfordshire LEADS Ecology team raised queries regarding the below concerns which have since been addressed through additional information provided by the applicant as follows:

1. **Great Crested Newts (GCN)** – In our previous response, the Ecology team raised concern regarding the two of the five ponds within 250m of the site that the Ecological Impact Assessment (EIA) report stated could not be surveyed during the assessment. The applicant has since shared the results of a previous surveys carried out as part of another application which indicate that these ponds are unsuitable for GCN. Ecology also noted in our previous response that the full results of the eDNA survey carried to determine GCN presence/absence in Pond 1 which the EIA report referenced as being within Appendix 5 of the EIA report, which was missing from the original report. Since, an updated EIA report has been submitted which includes Appendix 5 with the full results of the eDNA survey, confirming the result as Negative for GCN presence.

Having reviewed this additional information submitted, I would consider sufficient evidence to have been provided to determine that GCN are unlikely to be present on-site and impacted by the proposed works, and thus I would advise that no further surveys are required with regards to GCN.

2. **Bats** – We previously requested for the results of the Ground Level Tree Assessment (GLTA) to determine the potential of the trees on-site for roosting bats, notably those planned for removal, as the GLTA was mentioned in the EIA report yet the results were absent. The EIA report has since been updated to clarify the results of the GLTA, stating that “(n)o trees within the Site or along the boundaries have the potential to support roosting bats”. Whilst no photos of the trees on-site have been provided, considering that the Arboricultural Implications Report states that none of the trees to be removed are mature specimens, I see no reason to doubt this assessment.
3. **TPO** – Ecology queried whether, as suggested by the Arboricultural Implications Report, two trees protected under a TPO on the site had been removed. We acknowledge that the applicant notes that they are currently liaising to confirm whether these two trees protected under TPOs were removed from the site. However, this issue still stands, as confirmation is required on whether these trees have been removed under planning permission granted after 25th August 2023 - if this is shown to be the case, this loss needs to be accounted for in the BNG metric calculations for this application (see comments regarding BNG [below](#)).

Given how the above concerns regarding protected species have been addressed, I would therefore agree that no further surveys are required with regards to protected species. The EIA report recommends a number of mitigation and enhancement measures (pg. 14-18), including a **Construction Environmental Management Plan (CEMP)**, a **Biodiversity Enhancement Plan**, a **lighting strategy**, and a Landscape and Ecology Management Plan (LEMP) are produced. Considering the EIA results and the site context, I would consider these suggestions to be appropriate and would recommend that these are secured by **Condition** (see suggested wordings [below](#)), however, given the proposed enhancements to achieve BNG on-site, I would advise that a Habitat Management and Monitoring Plan (HMMP) would be appropriate instead of a LEMP (see comments regarding BNG [below](#)). These plans should be informed by the EIA report. Finally, I note that the EIA report mentions the presence of Montbretia, an invasive species listed on **Schedule 9** of the Wildlife and Countryside Act (1981). As such, appropriate measures should be included within the CEMP as to the handling of this species to ensure adherence to best practise guidance in order to avoid an offense being committed (see suggested wording in CEMP Condition [below](#)).

BNG – Pre-determination

Insufficient minimum information for determination: As mentioned above, confirmation on whether the two trees under TPOs were removed and when is required in order to determine whether this loss must be accounted for in the BNG metric. The start page for the currently submitted BNG metric has also not been completed – the name of the person who completed the BNG metric, which must be a suitably competent person(s), and the date upon which the BNG metric was completed, must be filled out. **Until these points are addressed, in line with government guidance, I must advise that there is currently insufficient minimum information regarding BNG for determination.**

However, should an updated metric be submitted with a completed start page which confirms that the BNG metric was completed by a suitably competent person(s), further information is submitted which confirms that the two trees were removed under a planning application granted prior to 25th August 2023, I would not consider there to be any other issues with regards to ecology that must be addressed prior to determination. In this case, re-consulting the LEADS Ecology team may be unnecessary; Hence, please see the below further comments regarding the BNG for this application.

1. **Habitat Assessment:** Sufficient information has been provided to allow the LPA to consider the UK habitat assessments provided i.e. the species for the areas of Other Neutral Grassland has been submitted and supports the assessment. The condition assessments for the areas of Other Neutral Grassland do not appear to have been submitted, however, given the current use of these areas as regularly-grazed pasture, I see no reason to doubt the assessment of Poor/Moderate condition for these areas. Based on this information, I advise that the LPA can be confident that the habitat assessment is sufficient to populate the biodiversity metric.
2. **Strategic Significance:** The values for the baseline habitats have been set as low in line with government LNRS guidance.

BNG – Determination

1. **Significant Onsite Enhancement (S106):** The proposed BNG includes large areas of medium /high distinctiveness habitats. As a result, I advise that the On-Site enhancements should be considered Significant Enhancement and in this case, this is **secured by aS106, or a conservation covenant**, for at least 30 years after the development is complete.

I advise that account is taken in any such agreement of the cost to the LPA of reviewing any required monitoring reports, this should reflect the small (1- 5 ha) site size and medium difficulty of creating and managing the habitats. Based on this I advise that, in line with the Ecology service (LEADS) monitoring cost calculator, a cost of £3,750 would be appropriate.

2. **Habitat Management and Maintenance Plan (HMMP):** I advise that the means by which the proposed on-site habitats will be created and enhanced (the capital works) and then managed for 30 years should be shown within a Habitat Management and Maintenance Plan (HMMP). The approved HMMP should be secured by **Condition**. I would also advise that the approved HMMP uses the template published by Natural England.
3. **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

1. **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.
2. **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.
3. **LNRS & Post Determination Strategic significance:** Areas of the application site are covered by mapped measures within the strategy (i.e. “Manage existing grassland and heathland to maintain the biodiversity of existing good quality habitats and enhance poor quality sites” (Grassland 1 action) and “Restore Swift Populations” (Species with Targeted Actions - Swift action). 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 measures for that area. Any post-development habitat interventions that meet both of these criteria will achieve a biodiversity unit uplift. For example, the areas of this application site where existing ‘Poor’ condition Other Neutral Grassland is improved to ‘Medium’ Condition may be eligible for uplift.

4. **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.
 - 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.
 - 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

Conditions and Informatives

1. **Biodiversity Enhancement Plan – Condition:** *“Prior to the commencement of development, a Biodiversity Enhancement Plan for protected and priority species shall be submitted to and approved in writing by the Local Planning Authority. The Plan should be informed by the Ecological Impact Assessment Report by Ecological Planning & Research Ltd (updated March 2026). Bat roosting features and Swift Bricks should be Integrated (built “into” rather than “onto” buildings), and features should be installed in a ratio of one for every two buildings and located according to ecological best practice. The plan shall include, but not be limited to, the following details:*
- a) *Purpose and conservation objectives for the proposed enhancement measures.*
 - b) *Description, design or specification of the type of feature(s) or measure(s) to be undertaken.*
 - c) *Detailed designs to achieve stated objectives.*
 - d) *Materials and construction to ensure long lifespan of the feature/measure.*
 - e) *Proposed locations shown by suitable maps and plans and where appropriate the elevations of the features or measures to be installed or undertaken.*

- f) *When the features or measures will be installed within the construction, occupation, or phase of the development.*
- g) *Persons responsible for implementing the enhancement measures.*
- h) *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."

2. **Lighting Plan – Condition:** *"A lighting design strategy for bats shall be submitted to and approved in writing by the LPA. This should be informed by the information and guidance regarding bats in the Ecological Impact Assessment Report by Ecological Planning & Research Ltd (updated March 2026) 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."*
3. **Construction and Environmental Management Plan (CEMP) – Condition: 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) *A review of any ecological impacts and should be informed by the submitted ecological report (Ecological Impact Assessment Report by Ecological Planning & Research Ltd (updated March 2026)).*
 - b) *Risk assessment of potentially damaging construction activities.*
 - c) *Identification of 'biodiversity protection zones'.*
 - d) *A set of method statements outlining practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction.*
 - e) *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).*
 - f) *Use of protective fences, exclusion barriers and warning signs, including advanced installation and maintenance during the construction period.*
 - g) *A non-native invasive species protocol (i.e. for Montbretia).*
 - h) *The times during construction when specialist ecologists need to be present on site to oversee works.*
 - i) *Responsible persons and lines of communication.*

- j) *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.

Reason: To ensure sensible working practices which protect ecology on and adjacent to this site."

4. Habitat Management and Monitoring Plan (HMMP) – Condition: *"The development shall not commence until a Habitat Management and Monitoring Plan (HMMP) aligning with the HMMP template produced by DEFRA and prepared in accordance with the approved Biodiversity Gain Plan, including:*

- a) a non-technical summary;*
 - b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;*
 - c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*
 - d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*
 - e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority;*
- has been submitted to, and approved in writing by, the Local Planning Authority. Thereafter, the approved plan will be implemented in accordance with the approved details for the duration of 30 years."*

1.1.21.3 Comments received 26 June 2026 removing objections subject to conditions:

BNG

In our previous response to this application, the Hertfordshire LEADS Ecology team advised that the LPA seek clarification on whether, as suggested by the submitted Arboricultural Implications Report, two trees protected under a TPO on the site had been removed and if so, whether this loss had been accounted for in the BNG metric baseline for this application. We also noted that the 'Start' page of the submitted BNG metric had not been completed as is required by government guidance.

The agent has since shared a response to our comments stating that, with regards to the removal of the two trees, "Streetview imagery appears to suggest any removal may have occurred on a date prior to January 2020". Government guidance indicates that when habitat

degradation has taken place between 30th January 2020 and the date of 'relevant date' e.g. the date of the application, the biodiversity pre-development value of the onsite habitat should be calculated as the biodiversity value of the habitat on the date immediately before the carrying out of these degradation activities. Therefore, taking at face value the comment that any removal of these two trees is thought to have taken place prior to 30th January 2020, the agent is correct that there is not currently an allowance for capturing the value of these trees within the BNG baseline should they have been removed prior to January 2020. An updated BNG metric has also been submitted in which the name of the person who completed the BNG metric and the date upon which the BNG metric was completed has been filled out. The rest of this updated metric appears to be consistent with the previously submitted metric, and I see no other reason to doubt the value of the habitat baseline previously submitted for this application.

Therefore, I would consider sufficient minimum BNG information for determination to have been provided and would advise that the application can be determined accordingly. Please do however refer back to our previous relevant comments on this application - I have copied our previously recommended conditions and informatives below for reference.

Conditions and Informatives

Biodiversity Enhancement Plan – Condition: *“Prior to the commencement of development, a Biodiversity Enhancement Plan for protected and priority species shall be submitted to and approved in writing by the Local Planning Authority. The Plan should be informed by the Ecological Impact Assessment Report by Ecological Planning & Research Ltd (updated March 2026). Bat roosting features and Swift Bricks should be Integrated (built “into” rather than “onto” buildings), and features should be installed in a ratio of one for every two buildings and located according to ecological best practice. The plan 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.”

1. **Lighting Plan – Condition:** *“A lighting design strategy for bats shall be submitted to and approved in writing by the LPA. This should be informed by the information and guidance regarding bats in the Ecological Impact Assessment Report by Ecological Planning &*

Research Ltd (updated March 2026) 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.”

3. Construction and Environmental Management Plan (CEMP) – Condition: 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) A review of any ecological impacts and should be informed by the submitted ecological report (Ecological Impact Assessment Report by Ecological Planning & Research Ltd (updated March 2026)).

b) Risk assessment of potentially damaging construction activities.

c) Identification of ‘biodiversity protection zones’.

d) A set of method statements outlining practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction.

e) 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).

f) Use of protective fences, exclusion barriers and warning signs, including advanced installation and maintenance during the construction period.

g) A non-native invasive species protocol (i.e. for Montbretia).

h) The times during construction when specialist ecologists need to be present on site to oversee works.

i) Responsible persons and lines of communication.

j) 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.

Reason: To ensure sensible working practices which protect ecology on and adjacent to this site.”

1 Habitat Management and Monitoring Plan (HMMP) – Condition: “The development shall not commence until a Habitat Management and Monitoring Plan (HMMP) aligning with the HMMP template produced by DEFRA and prepared in accordance with the approved Biodiversity Gain Plan, including:

2 a non-technical summary;

3 the roles and responsibilities of the people or organisation(s) delivering the HMMP;

4 *the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;*

5 *the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and*

6 *the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority;*

has been submitted to, and approved in writing by, the Local Planning Authority. Thereafter, the approved plan will be implemented in accordance with the approved details for the duration of 30 years."

I trust these comments are of assistance and kind regards.

1.1.22 Three Rivers Landscape Officer (Arboricultural): [No objection]

The site is within Metropolitan Green Belt and there are a small number of trees on the southern boundary that are protected by TPO 181. The site comprises of an area of heavily grazed horse pasture with scattered scrub and poor-quality trees and is bordered to the north and east by existing housing. The submitted plans indicate that a small number of poor-quality trees would be removed along the western boundary with the road, but a new area of tree planting and soft landscaping would be established along this boundary which would compensate for these losses. If the application is approved a tree protection method statement should be required and further details of proposed remedial landscaping.

1.1.23 Herts County Council Lead Local Flood Authority: [No objection]

RE: 25/2168/OUT - Outline application: Construction of up to 70 residential dwellings (Use Class C3) with associated access onto Oxhey Lane and infrastructure (Appearance, Layout, Landscaping and Scale as reserved matters) - Land Adjacent Woodlands Cottages, Oxhey Lane, Carpenders Park

Thank you for your consultation on the above site, received on 5 January 2026. We have reviewed the application as submitted and wish to make the following comments.

The site is greenfield in nature and is not currently served by an adopted sewerage network. The site is located in Flood Zone 1, and there is very low risk of surface water flooding. The applicant has provided an appropriate Flood Risk Assessment (FRA), Drainage Strategy and outline design plans (as listed in the Annex). These are to account for the local flood risk issues and surface water drainage at this location. Following a review of the submitted documents, the details are in accordance with NPPF and Local Plan policies 170, 176, 181 and 182.

The Drainage Strategy suggests that infiltration is not viable at the site, but no infiltration testing has yet taken place. Given that an alternative solution for surface water drainage has been provided, infiltration testing can be carried out at a later stage. If infiltration is shown to be unviable at the site, then the Drainage Strategy has shown that the site can be appropriately drained to the public surface water sewer. The LLFA is pleased to see that the Drainage Strategy utilises open and source control SuDS features. We would expect to see further SuDS features utilised throughout the development at detailed design stage. Given that this is an Outline application, the LLFA is happy with the level of detail provided at this stage and the applicant has demonstrated that the site can be safely drained at a reduced rate.

With this in mind, we have **no objection subject to conditions being attached to any consent** if this application is approved. We suggest the following wording. Hertfordshire County Council

Condition 1:

Prior to or in conjunction with the submission of each reserved matters application, in accordance with the submitted FRA and Drainage Strategy (dated 25 November 2025, Ref: ADC1632-RP-F), detailed designs of a surface water drainage scheme incorporating the following measures shall be submitted to and agreed with the Local Planning Authority. The approved scheme will be implemented prior to the first occupation of the development. The scheme shall address the following matters:

I Detailed infiltration testing in accordance with BRE Digest 365 (or equivalent) along the length and proposed depth of the proposed infiltration feature/s, (as stated within Chapter 2.15 of the FRA and Drainage Strategy).

Or

If infiltration is proven to be unfavourable, surface water runoff rates will be attenuated to 5.2l/s and discharged to the public surface water sewer, as stated within Chapter 6.14 of the FRA and Drainage Strategy.

I 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).

Detailed designs, modelling calculations and plans of the of the drainage conveyance network in the: 3.33% AEP (1 in 30 year) critical rainfall event plus climate change to show no flooding outside the drainage features on any part of the site.

1% AEP (1 in 100 year) critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any flooding outside the drainage features, ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development. It will also show that no runoff during this event will leave the site uncontrolled.

- The design of the infiltration / attenuation 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.
- 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.
- 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.

Reason:

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

Condition 2:

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 3:

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

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

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:

- a timetable for its implementation.
- details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located.
- 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

Please note if, you the Local Planning Authority review the application and decide to grant planning permission, notify the us (the Lead Local Flood Authority), by email at FRMConsultations@hertfordshire.gov.uk.

1.1.24 Hertsmere Borough Council: [Comment]

Hertsmere Borough Council (HBC) have undertaken a ‘Hertsmere Green Belt Assessment’ (Final Report dated April 2026) to inform the emerging Local Plan: - <https://www.hertsmere.gov.uk/asset-library/5.1-green-belt-assessment-report.pdf>

This sets out that land adjacent to, or in very close proximity, to the application site is considered to strongly contribute to both Purpose A and Purpose B of Paragraph 143 of the NPPF.

HBC would therefore raise questions in terms of whether the application site also performs strongly in terms of Purpose A and B, in which case the site would not fall to be ‘grey-belt and thus would be inappropriate development in the Green Belt. Inappropriate development is, by definition, harmful to the Green Belt and should 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.

The principle of development is a matter of key consideration for the determining LPA. Thus, Hertsmere Borough Council raises NO COMMENTS on the application. Three Rivers District Council should therefore proceed to assess the application against your development plan and the NPPF.

1.1.25 Natural England – No comments received.

1.1.26 Network Rail – No comments received.

1.1.27 Designing Out Crime Officer – No comments received.

1.1.28 Three Rivers Waste and Environmental Protection – No comments received.

1.1.29 Environmental Health Officer – No comments received.

1.1.30 Three Rivers Transport and Parking Officer – No comments received.

