25/2197/OUT APPENDIX A – CONSULTEE COMMENTS

1.1.1 Abbots Langley Parish Council – Objection

Members refer the Planning Officer to the comments submitted by this Council on 20th August 2021 as part of the Local Plan Regulation 18 Preferred Policy Options and Sites for Potential Allocation Consultation. Specifically for site CFS6, Members still feel development of this land contravenes basic greenbelt principles because it leads to unrestricted open sprawl. For this reason, Members cannot support this application as it stands.

1.1.2 HCC - Minerals and Waste Policy Team – No objection subject to conditions

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

British Geological Survey Data does identify that there could potentially be some sand/gravel deposits beneath the proposed development site.

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

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

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

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

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

- *the likely impact of proposed, non- waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;*
- *new, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is*

sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service;

- *the handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.'*

The supporting documents to this application 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). Section 8.10 of the Energy and Sustainability Statement notes that a SWMP will be prepared prior to commencement of the project. The county council welcomes this commitment.

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

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

As a minimum, the SWMP should include the following:

Project and People

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

Estimating Waste

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

Space for Later Recordings

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

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

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

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

1.1.3 HCC: Highway Authority – No objection, subject to conditions

Notice is given under article 22 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 that Hertfordshire County Council (HCC) as Highway Authority (HA) 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 up to 25 dwellings;
b. Visibility splays of 2.4m by 25m illustrated on a scaled plan at any junctions / vehicles accesses within the site.
c. The link between the site and public footpath Abbots Langley 029 to be provided at a width of a minimum of 2m.
d. Layout and dimensions of all parking spaces and associated manoeuvring areas designed in accordance with HCC's Place & Movement Planning and Design Guidance (PMPDG), Part 4, Chapter 6.

e. Turning areas and swept path analysis to illustrate that the largest anticipated vehicles to use 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.
f. Provision for an on-site refuse/recycling store(s) within 30m of each dwelling and 25m of any collection point;
g. Turning areas and swept path analysis to illustrate that a fire tender (at least 8.1m in length/ 2.9m in width for a standard fire tender and 10.4m 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 / community buildings 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 necessary offsite highway improvement works, have been submitted to, and approved in writing by, the Local Planning Authority. These works shall include:

- Widening of the footway as indicated on drawing 1140-TA10A and resurfacing of this length of footway. New pedestrian dropped kerbs and tactile / blister paving on the footway on either side of Dairy Way and relocation of the bollards as necessary to facilitate safe access.
- Easy access kassel kerbing and Real Time Information (RTI) screen for the northbound stop /west side of Bedmond Road;

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

a. Construction vehicle numbers, type, routing;
b. Access arrangements to the site;
c. Traffic management requirements
d. Construction and storage compounds (including areas designated for car parking, loading / unloading and turning areas);
e. Siting and details of wheel washing facilities;

f. Cleaning of site entrances, site tracks and the adjacent public highway;
g. Timing of construction activities (including delivery times and removal of waste);
h. Provision of sufficient on-site parking prior to commencement of construction activities;
i. 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:

A Travel Plan in accordance with the provisions as laid out in Hertfordshire County Council's Travel Plan Guidance, would be required to be in place from the first occupation/use until 5 years post full occupation. A £1,200 per annum (overall sum of £6000 and index-linked RPI March 2014) Evaluation and Support Fee would need to be secured via a Section 106 agreement towards supporting the implementation, processing and monitoring of the full travel plan including any engagement that may be needed along with the provision of Residential Travel Vouchers to each dwelling on site of £100 per house and £50 per flat.

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.

TO NOTE:
A draft 106 agreement has been submitted as part of the application which makes some general reference to sustainable transport contributions. The draft makes reference to contributions that are out of date and superseded by a new toolkit used by HCC for obligations sought, a copy of which can be viewed at:

https://www.hertfordshire.gov.uk/about-the-council/freedom-of-information-and-council-data/open-data-statistics-about-hertfordshire/who-we-are-and-what-we-do/property/planning-obligations-guidance.aspx

Comments
The planning application is an outline application for 93 dwellings with associated works on land at Bedmond Road, Abbots Langley.

The site is included in Three Rivers District Council's (TRDC) draft local plan as housing allocation CF56. A Transport Statement (TS) has been submitted as part of the outline planning application. The site is located on the east side of Bedmond Road on the northern edge of Abbots Langley and just south of the M25. The site is accessed via Notley Court. Bedmond Road is designated as a classified C secondary distributor road, subject to a speed of 30mph and is highway maintainable at public expense. On HCC's Place and Movement Network, Bedmond Road is classed as P1/M2 (Inter-urban road). Notley Court is a private road and not highway maintainable at public expense.

1. Access

a. Highway Works

The proposals utilise the existing simple priority junction between Bedmond Road and Notley Court, which was constructed to support planning application 18/0223/FUL. The junction is made up of a 5.5m carriage width with 2m footways on either side. The provision is considered to be acceptable to support access to the existing and proposed dwellings and is in accordance with HCC's Place & Movement Planning and Design Guidance (PMPDG).

The off-site highway works included at this stage are shown on drawing number 1140-TA10 A (appendix F of the TS) - widening of the existing footway on the west side of Bedmond Road to 2m from opposite the site access junction to the junction of Bedmond Road with Dairy Way. HCC as HA would be supportive of the proposed widening as parts of the footway along this stretch are only 1.3m, less the necessary 2m with as laid out in PMPDG. In order for the overall proposals to be acceptable

from a highways perspective, a number of highway works would be necessary to be provided including:

- Widening of the footway as indicated on drawing 1140-TA10A and resurfacing of the this length of footway.

- New pedestrian dropped kerbs and tactile / blister paving on the footway on either side of Dairy Way and relocation of the bollards as necessary to facilitate safe access.

- Easy access kassel kerbing and Real Time Information (RTI) screen for the northbound stop /west side of Bedmond Road;

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. It would be recommended that a Stage One Road Safety Audit and Designer's Response (RSA1) is included as part of the original 278 application.

Please see the above conditions and informatives for more information in relation to applying for the 278.A footway is not currently proposed to the south of the site entrance on the east side of Bedmond Road (where there isn't currently a footway). Following consideration of the improvements proposed (and required) to the footway on the west side of Bedmond Road in addition to the pedestrian link to public footpath Abbots Langley 029, the provision for pedestrian accessibility to and from the site is considered to be sufficient.

b. Internal Site Road Layout Considerations
The TS states that the "geometry of the internal highway arrangement has been fixed so that it will comprise a 5.5m wide carriageway with 2m wide footways on either side of the carriageway", which is in accordance with HCC's PMPDG. HCC as HA would be supportive of the connection point onto the public footpath Abbots Langley 029, which would provide pedestrian access between the site and the existing footway and bus stop on the east side of Bedmond Road. The footpath link has currently proposed appears to be less than 2m. It would be recommended than the width be increased to a minimum of 2m to ensure accordance with the PMPDG.

Any pedestrians and cycling provisions within the site would need to be designed in accordance with 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 is 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.

The reserved matters details should also take into consideration than 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.

HCC as HA does not have any specific concerns in respect to access for service or emergency vehicles at this outline stage. As part of the reserved matters and once the detailed internal layout of the site has been finalised, swept path analysis for a refuse vehicle (12m in length) and 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 to illustrate that such vehicles can safely access the site and turn around in forward gear. The analysis would also need to illustrate that a fire tender would be able to get to within 45m of all parts of the footprint of any dwellings, 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).

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 refuse collection authority.

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. 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. Consideration in this respect would also need to be given that Notley Court is a private road and therefore any adoption of the new road would be dependent on this also being dedicated as highway (which would require dedication by the relevant landowner and any necessary upgrades that may be necessary to ensure that it has been constructed to an adoptable standard).

Notwithstanding the above points, the overall works would still 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. The proposed development would also need to make adequate provision for drainage on site to ensure that surface water is disposed of on site and does not discharge onto the highway network.

2. Parking Level and Design

The layout and dimensions of all vehicle and cycle parking spaces and associated manoeuvring areas of 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.

The TS (4.3.1) states that "parking within the development will be provided in line with local standards". TRDC as the planning authority for the district would ultimately need to be satisfied with the overall proposed parking levels on site taking into account the use class, accessibility zone and the local area. Therefore it is recommended that TRDC are consulted separately in this respect.

HCC as HA would support an appropriate level and type of electric vehicle charging provision to ensure that the proposals are in accordance with LTP4, Policy 5h, which

states that “Ensure that any new parking provision in new developments provides facilities for electric charging of vehicles” and building regulations.

3. Trip Generation
A trip generation assessment has been included in section 4.4 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 54 two-way vehicle movements in the AM peak (0800-0900) and 53 two-way vehicle movements in the PM peak (1700-1800).

TO NOTE: the TS refers to “78 residential dwellings” in paragraph 4.4.3 of the TS, which presumably is an error. Nevertheless the trip rates themselves appear to have been calculated using the correct number of dwellings of 93.

HCC as HA has assessed and reviewed the generation 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.” The above trip levels would not be deemed to be severe or have a highway safety issue when taking into account the location and surrounding road network.

4. Bus Services
The nearest northbound bus stop to the site is located approximately 240m from the site access with the nearest southbound bus stop approximately 340m away and therefore within the necessary walking distance of 400m.

The bus stops are currently served by services 20 and 320. Service 20 runs between the Holywell Estate in Watford and Hemel Hempstead and includes stops at Hemel Hempstead Railway Station and Watford Junction Railway Station. Service 20 provides a service with a frequency of between 3 per hour (Mon to Fri), 2 per hour (Sat) and hourly (Sun). The service is therefore considered to be sufficient to support the bus as a feasible form of sustainable travel for residents of the new site. A number of other more infrequent services also stop at the nearest bus stops, with H19 serving Love Lane (the northbound stop) and 329, KL80 and R9 serving Summerhouse Way (the southbound stop).

5. Travel Plan (TP) Planning Obligations
For a development of this size a full TP would need to be provided and secured via a Section 106 planning obligation 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 (NPPF). Developer contributions of £6000 (index-linked RPI March 2014) are sought via a Section 106 Agreement towards supporting the implementation, processing and monitoring of a full travel plan including any engagement that may be needed along with the provision of Residential Travel Vouchers to each dwelling on site of £100 per house and £50 per flat. For further information please see the following link https://www.hertfordshire.gov.uk/services/highways-roads-and-pavements/business-and-developer-

information/developmentmanagement/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 outline planning application, subject to the inclusion of the above planning conditions, obligations and informatives.

1.1.4 Community Safety Intervention Officer – Comments received

The layout should promote natural surveillance, with active frontages overlooking streets, parking areas, footpaths and communal spaces.

Avoid blank elevations, rear fencing onto public areas, and poorly overlooked alleyways which can facilitate ASB.

Communal amenity spaces should be clearly defined, well overlooked by surrounding dwellings, and designed to discourage loitering and nuisance behaviour.

Consider management arrangements for shared spaces to prevent misuse and long-term ASB issues.

Adequate, well-designed lighting should be provided throughout the site, particularly along pedestrian routes, parking areas, and communal spaces.

Parking areas should be well overlooked by nearby properties to reduce the risk of vehicle-related ASB and crime.

Landscaping should not create hiding places or obscure sightlines (e.g. overly dense shrubs or tall planting near paths and entrances).

Refuse and recycling areas should be secure, well located, and overlooked to prevent misuse and fly-tipping.

1.1.5 East of England Ambulance Service – Comments received

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

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

Impact of the Development on Ambulance Services
*The proposed 93 dwelling development is expected to generate an additional **218 residents**, based on the local authority average of **2.4 persons per dwelling**. Using EEAST's established and standardised population-based activity model, this population uplift is forecast to generate **50 additional emergency calls per year**.*

*This represents an **4.3% increase in annual activity** arising from this development when compared to current incident levels in the WD50 area (1,185 incidents between 1 April 2024 – 31 March 2025).*

This level of additional activity directly increases:

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

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

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

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

Watford Hub provision needs to support approximately 40 Dual-Staffed Ambulances and 4 Rapid Response Vehicles, yet it currently accommodates only 16 vehicles. Increased population growth in the catchment area will further intensify this shortfall.

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

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

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

The requested contribution meets all three tests.

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

No of dwellings	*Infrastructure Cost**	*Total*
93	*£371*	*£88,353*

**calculation of £340 is based on 2.2 persons per dwelling and adjusted pro-rata depending on the expect number of persons per dwelling (2.4 for Three Rivers).*

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 ***£88,353*** *and are for the impact of this development only and will be used to support:*

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

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

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

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

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

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

Health and Wellbeing Scheme Design Measures
EEAST would request the developer which should consider the impact all health organisations including primary care, acute, mental health, community and emergency ambulance services.

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

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

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

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

Flood Assessments
EEAST notes the site is within Flood Zone 1.

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

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

Transport, Design and Access
Cycle parking should allow for different types of cycles (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.

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

1.1.6 Local Plans – Comments received

The proposal relates to the development of up to 93 residential dwellings, associated access and landscaping. The majority of the application site is located within the Metropolitan Green Belt (with the exception of the access road off Bedmond Road).

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 majority of the site is not within a defined settlement, although the access road to the north of Notley Court is located within the settlement boundary of Abbots Langley. Similarly, the majority of the site is not previously developed land, with the exception of the access to the north of Notley Court. The development would result in the net gain of up to 93 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 93 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, 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 Housing 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 relatively close to Listed Buildings (to the south and west of the site). 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".

It must be noted that on 27th January 2026, Full Council agreed to publish the emerging Local Plan for Regulation 19 Consultation. At the time of writing, the emerging Plan has not been published for the Regulation 19 consultation, with this scheduled to take place in February 2026. The site is allocated for housing (housing allocation policy H8) within the Regulation 19 version of the emerging Plan. Once published, weight should be given to this housing allocation within the emerging Local Plan.

1.1.7 Thames Water – Comments received

Waste Comments:
With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission.

"No development shall be occupied until confirmation has been provided that either:-
1. Foul water Capacity exists off site to serve the development, or

2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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, or

3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at www.thameswater.co.uk/preplanning. 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.

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 online via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

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

Water Comments:
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.

Supplementary Comments:
For Thames Water to determine whether the existing sewer network has sufficient spare capacity to receive the increased flows from the proposed development, a drainage strategy must be submitted detailing the foul water strategy. Details of any proposed connection points or alterations to the public system, including calculated discharge rates (pre and post development) must be included in the drainage strategy.

1.1.8 Environmental Health Officer – No objection, subject to conditions

The Air Quality report, AQ14971 2025/11/07 as submitted demonstrated that the residents/occupants are not expected to be exposed to any pollutants in excess of the National Air Quality Objectives and as such we would have no objections. The report does highlight that during the construction phase of the Proposed Development there is the potential for air quality impacts as a result of fugitive dust emissions from the site. These were assessed in accordance with the IAQM methodology. Assuming good practice dust control measures are implemented, the residual potential air quality impacts from dust generated by earthworks and construction and trackout activities was predicted to be not significant. I would advise

consultation with TRDC Env Health to consider adding conditions if suitable to mitigate construction phase emissions and potential nuisance.

Based on the scale of the development, the standard contaminated land condition is recommended on this and ***any subsequent applications*** *for the site.*

1. Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

i) A preliminary risk assessment which has identified:

- *all previous uses*
- *potential contaminants associated with those uses*
- *a conceptual model of the site indicating sources, pathways and receptors*
- *potentially unacceptable risks arising from contamination at the site.*

ii) A site investigation scheme, based on (i) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.

iii) The site investigation results and the detailed risk assessment (ii) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.

iv) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in (iii) are complete and identifying any requirements for longer term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

2. Following completion of measures identified in the approved remediation scheme and prior to the first use or occupation of the development, a verification report that demonstrates the effectiveness of the remediation carried out must be produced together with any necessary monitoring and maintenance programme and copies of any waste transfer notes relating to exported and imported soils shall be submitted to the Local Planning Authority for approval. The approved monitoring and maintenance programme shall be implemented.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

The above must be undertaken in accordance with the Environment Agency's 'Land contamination risk management (LCRM)' guidance, available online at

https://www.gov.uk/government/publications/land-contamination-risk-management-lcrm.

3. Reporting of Unexpected Contamination: In the event that contamination is found at any time when carrying out the approved development that was not previously identified it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 1, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 1, which is subject to the approval in writing of the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared, which is subject to the approval in writing of the Local Planning Authority in accordance with condition 1.

Reason: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors.

1.1.9 HCC – Growth and Infrastructure Unit – Comments received

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

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

Secondary Education Contribution *towards the delivery of a new secondary school and/or provision serving the development (£751,198 (which includes land costs of £14,835) index linked to BCIS 1Q2024 and BCIS Regional Factor)*

Special Educational Needs and Disabilities (SEND) *Contribution towards new Severe Learning Difficulty (SLD) special school places (WEST) and/or provision serving the development (£137,722 index linked to BCIS 1Q2024 and BCIS Regional Factor)*

Waste Service Transfer Station Contribution *towards the increasing capacity at Waterdale Transfer Station and/or provision serving the development (£9,920 index linked to BCIS 1Q2024)*

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

The CIL Regulations discourage the use of formulae to calculate contributions; however, the County Council is not able to adopt a CIL charge itself. Accordingly, in areas where a CIL charge has not been introduced to date, planning obligations in their restricted form are the only route to address the impact of a development. In instances where a development is not large enough to require on site provision but is large enough to generate an impact on a particular service, an evidenced mechanism is needed to form the basis of any planning obligation sought. HCC views

the calculations and figures set out within the Guide to Developer Infrastructure Contributions as an appropriate methodology for the obligations sought in this instance.

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

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

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

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

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

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

(ii) Directly related to the development.
The occupiers of new residential developments will have an additional impact upon local services. The financial contributions sought towards the above services are based on the size, type and tenure of the individual dwellings comprising this development following consultation with the Service providers and will only be used

towards services and facilities serving the locality of the proposed development and therefore, for the benefit of the development's occupants.

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

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

1.1.10 Conservation Officer – Objection

Outline application: Erection of up to 93 dwellings with associated access, parking, amenity space and landscaping (Appearance, Layout, Landscaping and Scale as reserved matters)

The Site consists of open fields, most recently used in connection with an equestrian centre on Bedmond Road. There is a gated vehicular access to the Site via Notley Court.

The proposal has the potential to impact the following heritage assets:

The Grade II listed Mansion Farmhouse (List Entry Number 1348213) built in the middle to late seventeenth century, with extensions in the eighteenth and nineteenth centuries. It is finished in red brick with some timber framing. The farmhouse was converted into several separate residential units in the 1980's, as were the outbuildings, which are considered curtilage listed and are just north of the farmhouse.

The Grade II listed Tithe Barn (List Entry Number: 1100908) is an aisled barn with a timber frame with origins in the fifteenth century, with seventeenth century alterations to the west of the Site. It was formerly part of Parsonage Farm which occupied a land holding to the west.*

Former Ovaltine Dairy Farm buildings are included on the Three Rivers list of Locally Important Buildings. They date from the 1920/1930's and were used to supply goods to the Ovaltine Factory. They are built in a mock Tudor style with characteristics designed to imitate the farm King Louis XVI bought for Marie Antoinette. They have local historic and architectural interest.

The proposal comprises an outline application for a major residential scheme, to be accessed from Bedmond Road. The indicative layout shows housing along a single street with three apartment blocks at a height of three storeys including one to the rear of Notley Court.

The Site would be a short distance to the northeast of the farm complex at Mansion Farm, with part of the red line abutting houses in the converted barn. The character of the barn and farm buildings have been altered to some extent due to sub-division and extensions. However, they are still recognisable as a historic farm complex. 1841 Tithe apportionments indicate the Site was part of Mansion Farm at that time. While the use has been altered, it was subsequently an open field in a rural use, located to the rear of the listed farm buildings. The Site makes a positive contribution as part of the historic semi-rural setting of the farm buildings. The setting of the farm buildings has been diminished by the new houses to the north at Notley Court, which increased the importance of the Site as part of its setting. In addition, it is acknowledged that

land immediately to the rear/west of the farm is part of a covered reservoir and will remain as an open field.

However, the proposal would further erode this semi-rural setting and result in less than substantial harm to the farm buildings in principle due to the fundamental change in land use. This is exacerbated by the indicative layout, which shows an apartment building near the southwestern edge of the development close to the historic farm outbuildings. This layout does not respond to the listed buildings or the rural edge location. On this basis, the proposal would result in less than substantial harm to the significance of the listed Mansion Farmhouse and curtilage listed outbuildings and would not be supported.

In relation to the Locally Important Buildings at Ovaltine Dairy Farm, they are across the road and there is no known functional association with the Site. However, the Site makes a positive contribution as part of their immediate rural setting. The proposal would be partly screened by Notley Court, but there is likely to be intervisibility with the Site, particularly with the taller buildings and would erode their rural setting. This would result in less than substantial harm to the non-designated heritage assets.

In relation to the Grade II listed Tithe Barn, due to its siting further south and set back from the road, and the screening from Notley Court, its setting does not extend to the Site, and the proposal is unlikely to result in harm to its significance.*

The proposal would not preserve the special interest of Mansion Farmhouse and outbuildings, contrary to Section 66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. Regarding the NPPF, the proposal would result in less than substantial harm as per paragraph 215 and this harm should be weighed against the public benefits of the proposal. Great weight should be given to the asset's conservation, as per paragraph 212.

The proposal would result in less than substantial harm to the setting of the Locally Important Buildings at Ovaltine Dairy Farm which are non-designated heritage assets. This harm should be considered in determining the application and a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset as per NPPF paragraph 216.

1.1.11 HCC Lead Local Flood Authority (LLFA) – No objection

Thank you for consulting the Lead Local Flood Authority (LLFA) on the above application. We have reviewed the submitted Flood Risk Assessment (Martin Andrews Consulting Ltd, Ref: 1140-FRA-01-A, 2025) together with the application form and supporting documentation.

The FRA confirms that the site lies within Flood Zone 1, at low probability of flooding from rivers and the sea. The assessment also indicates the site is at very low risk of surface water flooding and not at significant risk from reservoirs, groundwater or sewer flooding.

The FRA sets out a drainage strategy based on infiltration, including the use of permeable paving, rain gardens and an infiltration basin discharging to deep borehole soakaways within the underlying chalk strata. Infiltration testing presented in the FRA indicates that deep infiltration is feasible and is the preferred drainage solution in accordance with the drainage hierarchy.

As this is an outline application and detailed drainage design has not yet been provided, the LLFA have no objection in principle, subject to the following planning

conditions to secure the detailed design, implementation and long-term management of the surface water drainage system. If the following conditions are not included, the development would be contrary to NPPF and Local Plan policies and we would object until such time that the details below are submitted for review.

Condition 1

All development shall be constructed in accordance with the submitted and approved Flood Risk Assessment (Ref: 1140-FRA-01, November 2025), this includes all new residential dwellings to have a finished floor level raised a minimum of 300mm above any design flood level and 150mm above the surrounding proposed ground level unless otherwise first approved in writing by the Local Planning Authority.

Reason: To ensure the flood risk is adequately addressed and not increased in accordance with NPPF and Policies of Three Rivers District Council.

Condition 2

Prior to or in conjunction with the submission of each reserved matters application, in accordance with the submitted FRA and Drainage Strategy (Flood Risk Assessment, Ref: 1140-FRA-01, November 2025) and drawing number 1140-FRA03 (Proposed Drainage Strategy, REV D), 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.
II. Provision of surface water attenuation storage, sized and designed to accommodate the volume of water generated in all rainfall events up to and including the critical storm duration for the 3.33% AEP (1 in 30 year) and 1% AEP (1 in 100) rainfall events (both including allowances for climate change).
III. Detailed designs, modelling calculations and plans of the of the drainage conveyance network in the:

- 3.33% AEP (1 in 30 year) critical rainfall event plus climate change to show no flooding outside the drainage features on any part of the site.
- 1% AEP (1 in 100 year) critical rainfall plus climate change event to show, if any, the depth, volume and storage location of any flooding outside the drainage features, ensuring that flooding does not occur in any part of a building or any utility plant susceptible to water (e.g. pumping station or electricity substation) within the development. It will also show that no runoff during this event will leave the site uncontrolled.

IV. The design of the infiltration basin will incorporate an emergency spillway and any drainage structures include appropriate freeboard allowances. Plans to be submitted showing the routes for the management of exceedance surface water flow routes that minimise the risk to people and property during rainfall events in excess of 1% AEP (1 in 100) rainfall event plus climate change allowance.
V. Finished ground floor levels of properties are a minimum of 300mm above expected flood levels of all sources of flooding (including the ordinary watercourses, SuDS features and within any proposed drainage scheme) or 150mm above ground level, whichever is the more precautionary.

VI. Details of how all surface water management features to be designed in accordance with The SuDS Manual (CIRIA C753, 2015), including appropriate treatment stages for water quality prior to discharge.
VII. A maintenance and management plan detailing the activities required and details of who will adopt and maintain the all the surface water drainage features for the lifetime of the development.

Reason: To prevent flooding in accordance with National Planning Policy Framework paragraphs 173,175 and 180 by ensuring the satisfactory management of local sources of flooding surface water flow paths, storage and disposal of surface water from the site in a range of rainfall events and ensuring the SuDS proposed operates as designed for the lifetime of the development.

Condition 3
Development shall not commence until details and a method statement for interim and temporary drainage measures during the demolition and construction phases have been submitted to and approved in writing by the Local Planning Authority. This information shall provide full details of who will be responsible for maintaining such temporary systems and demonstrate how the site will be drained to ensure there is no increase in the off-site flows, nor any pollution, debris and sediment to any receiving watercourse or sewer system. The site works and construction phase shall thereafter be carried out in accordance with approved method statement, unless alternative measures have been subsequently approved by the Planning Authority.

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

Condition 4
The development hereby approved shall not be occupied until details of the maintenance and management of the sustainable drainage scheme have been submitted to and approved in writing by the Local Planning Authority. The drainage scheme shall be implemented prior to the first occupation of the development hereby approved and thereafter managed and maintained in accordance with the approved details in perpetuity. The Local Planning Authority shall be granted access to inspect the sustainable drainage scheme for the lifetime of the development. The details of the scheme to be submitted for approval shall include:

I. a timetable for its implementation.
II. details of SuDS feature and connecting drainage structures and maintenance requirement for each aspect including a drawing showing where they are located.
III. a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public body or statutory undertaker, or any other arrangements to secure the operation of the sustainable drainage scheme throughout its lifetime. This will include the name and contact details of any appointed management company.

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

Condition 5
Prior to first use of each phase of the development a detailed verification report, (appended with substantiating evidence demonstrating the approved construction details and specifications have been implemented in accordance with the surface

water drainage scheme), has been submitted to and approved (in writing) by the Local

Planning Authority. The verification report shall include a full set of "as built" drawings plus photographs of excavations (including soil profiles/horizons), any installation of any surface water drainage structures and control mechanisms.

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

Informative:

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.

1.1.12 Herts Ecology – Comment received, further information and/or amendments are required before the application can be determined.

Summary of advice:

- A copy of the IACPC countersigned by Natural England demonstrating agreement to join the GCN District Level Licensing Scheme must be submitted to the LPA prior to determination.
- The following elements to be secured by condition:
    - A CEMP: Biodiversity
    - Badger walkover
    - Vegetation Clearance Plan with particular reference to Reptiles
    - Pre-felling endoscope survey of the ash tree with a PRF-I
    - Lighting Strategy including dark corridors.
    - A Species Enhancement Plan.
- The submitted BNG report & Metric calculation shows that the proposed development will lead to a net loss in biodiversity and the BNG trading rules will not be met. In order to achieve the mandatory minimum of 10% net gain in biodiversity it is proposed to use a combination of on-site enhancements/habitat creation and off-site measures.
- The proposed enhancements are 'significant' and therefore will need to be secured by legal agreement for 30 years. An S106 agreement and HMMP will be required. This should ideally be settled prior to determination to avoid the possibility that the Biodiversity Gain Condition cannot subsequently be discharged.
- The off-site measures can be settled at the Biodiversity Gain Plan Stage.

Supporting documents:

I have made use of the following documents in providing this advice:

- Ecological Impact Assessment (ACD Environmental, 18/09/2025
- Biodiversity Net Gain Assessment (ACD Environmental, 07/11/2025)
- Statutory Metric Calculation (Prue Hilditch, ACD Environmental, 07.11.25)
- Planning Statement (Directive Planning and Developments, March 2025)

Comments:

An Ecological Impact Assessment has been submitted in support of the application (ACD Environmental, 18/09/2025).

Protected Species

Sufficient surveys have been carried out to determine the outline application in regards of protected species. The EcIA includes specific recommendations that should be followed for protected species that I advise are secured by Condition.

To this effect, I advise method statements based on the mitigation within the ecology reports including its appendix for but not limited to badgers, reptiles, nesting birds, non-licensable mitigation for bats and great crested newts as well as standard best practice measures to protect commuting and foraging mammals such as badgers and hedgehogs should be submitted for approval to the LPA. These are best demonstrated within an ecological section of a Construction Environmental Management Plan, such as below or similar.

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

1. A review of any ecological impacts and should be informed by the submitted ecological report (Ecological Impact Assessment (EcIA) by ACD Environment Ltd (report date 18/09/2025).
2. Risk assessment of potentially damaging construction activities.
3. Identification of 'biodiversity protection zones'.
4. A set of method statements outlining practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction.
5. 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).
6. Use of protective fences, exclusion barriers and warning signs, including advanced installation and maintenance during the construction period;
7. The times during construction when specialist ecologists need to be present on site to oversee works.
8. Responsible persons and lines of communication.
9. 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.

In addition, I have the following comments:

Great Crested Newts (GCN): The site contains habitat suitable to dispersing/sheltering GCN in their terrestrial phase, which will be impacted by the development. Five ponds were identified with 500m of the site. Of the 3 surveyed, the closest pond had confirmed presence of GCN. It can be reasonably assumed that the 2 non-surveyed ponds (which are both ~20m from the site boundary) may also support GCN.

The Planning Statement states that *"A District Level Licence for great crested newts will be obtained before clearance activities may begin."*

To join the District Level Licensing Scheme the applicant will be required to apply for an Impact Assessment and Conservation Payment Certificate (an IACPC) from Natural England. **A copy of the IACPC countersigned by Natural England must be submitted to the LPA prior to determination** to demonstrate agreement to join the scheme. If planning permission is not granted, reapplication to join the scheme is required with any subsequent revised development proposal.

Badger: I support the recommendation in the EcIA that prior to any vegetation clearance, a Badger walkover survey shall be carried out. I advise that details including an assessment of the impact of the proposed development and any appropriate mitigation measures to alleviate such impacts shall be submitted to and approved in writing by the Local Planning Authority. The location of any protective fencing (if required) around setts / commuting routes should be marked on a plan and also submitted to the Local Planning Authority for approval. All works shall then proceed in accordance with the approved scheme of mitigation.

Bats: The Planning Statement notes that *"a pre-felling endoscope will also be required on the ash tree identified as holding low bat roosting potential prior to removal."* Additionally, it is noted that *"a sensitive lighting scheme is to be followed during the construction and operational phases to reduce impacts of artificial lighting on potential commuting paths of bats and other nocturnal mammals."*

I advise that any lighting plans should be designed in consultation with a professional bat ecologist and developed at an early stage to ensure that the amenity, safety and ecological requirements of the lighting plan can be developed in conjunction. I advise that the lighting strategy is secured by condition.

Reptiles: Seven presence/absence survey visits for reptiles were undertaken between April and June 2025 which identified 1 juvenile and 1 sub-adult grass snake. This would suggest a breeding population on or adjacent the site. Whilst the surveys were carried out at an appropriate time of year, it is noted that the majority of the visits were carried out late morning after reptiles are likely to have dispersed and the latter two survey visits were undertaken in unsuitable temperatures of over 20oC, thus there is a likelihood that numbers have been underestimated. However, as the majority of the site comprises short sward grassland and most of the more suitable edge habitat is proposed to be retained, I consider the risk of negative impact is likely to be low. Nevertheless, I propose that an appropriate vegetation clearance strategy that will minimise the risk to reptiles, amphibians and small mammals is secured by condition.

Enhancements: The Ecological report includes recommendations for species enhancements I advise the installation of these will allow the application to be policy compliant with section187d of the NPPF and Local policy. I advise these are secured by the following Condition or similar:

"Prior to the commencement of development, a Biodiversity Species 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 section 8.2 of the ecology report by ACD Environmental, 18/09/2025*. With the exception that the sparrow or starling terraces are replaced by universal swift bricks. Bat roosting features and Swift Bricks should be Integrated (built "into" rather than "onto" buildings). Features should be installed*

in a ratio of one for every two buildings and located according to ecological best practice.

The scheme/ 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."

Biodiversity Net Gain

A Biodiversity Net Gain Assessment has been submitted which shows that the proposed development would result in a net loss of -10.66 Area Habitat Biodiversity Units (-42.19%) and a net gain of +0.4 Linear Biodiversity Units (+23.29%).

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 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.

However, the proposed enhancements on-site - the creation of 'good' condition Other Neutral Grassland and Mixed Scrub and the planting of 47 new trees - would be considered 'significant' and therefore would need to be legally secured for 30 years.

If the applicant submits a gain plan at the post determination stage which includes significant onsite enhancement which cannot be secured through the planning process at that stage, it will not be possible for the gain plan to be discharged. In this case a new biodiversity gain plan would need to be submitted demonstrating a net gain using either an offsite solution or the use of biodiversity credits.

It is recommended that a Habitat Management and Monitoring Plan is submitted prior to determination to demonstrate that this habitat creation is achievable.

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 by the use of an off-site location or by purchase of third-party biodiversity units from a habitat bank. As a last resort if an off-site location or suitable units to purchase cannot be found Statutory Biodiversity Credits would need to be purchased. In this latter case the applicant must demonstrate to the satisfaction of the LPA that all other options have been fully explored and that the BNG hierarchy has been followed.

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

LNRS & Post Determination Strategic significance: Areas of the application site are covered by mapped measures within the strategy. 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.

1.1.13 Affinity Water – Initial Objection

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 1 (SPZ1) which corresponds to our abstraction boreholes (BRIC) for public water supply.

We currently object to the application and require the submission of further information for our review, to allow us to assess the application in greater detail and, if we are able to remove our objection, provide informed condition requirements. This further information should include the following:

i. *A Ground Investigation to identify the current state of the site and appropriate techniques for any on site works to avoid displacing any contamination to a greater depth, including the generation of turbidity.*
ii. *A Risk Assessment identifying both the aquifer and the abstraction point as potential receptors of contamination, including turbidity generation from groundworks and the use of deep bore soakaways.*
iii. *Proposals for the likely depth and type of excavations (e.g. piling) including mitigation measures (e.g. appropriate piling design, etc.) to prevent and/or minimise any potential migration of pollutants to public water supply.*

This investigation and risk assessment is of particular importance due to the proposals for deep bore soakaways as the proposed method for surface water disposal in an SPZ1, as these are opening up potential pathways for pollutants into the aquifer. It will need to be demonstrated that this method has been appropriately risk assessed with, the aquifer and abstraction point included as receptors. Information from the ground investigation should be used for the assessment.

We need to ensure we have been provided with as much information as possible for our review, as issues arising from the development 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.

At this time, it is our view that the development as proposed represents a risk to groundwater, however if our requests, set out above, have been addressed we may ask that appropriate conditions are imposed to protect the public water supply.

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.

1.1.14 Affinity Water (Second Consultation) – Objection overcome, subject to conditions.

Following on from our response dated 04/02/2026 we have since been provided with a Hydrogeological risk assessment for our review and we are now prepared to remove our objection, provided that the following conditions are applied to the development:

Contamination through Ground Works:

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

Condition 1
Prior to the commencement of the development, no works involving excavations (e.g. for foundations (e.g. piling), drainage (e.g. infiltration), geothermal system etc.) shall be carried until the following has been submitted to and approved in writing by the Local Planning Authority in consultation with Affinity Water:

- *An Intrusive Ground Investigation to identify the current state of the site and appropriate techniques to avoid displacing any shallow contamination to a greater depth.*
- *A Remediation Strategy/Report if found to be needed following the results of the intrusive investigation detailing how contamination (if found) will be dealt with. The remediation strategy shall be implemented as approved with a robust pre and post monitoring plan to determine its effectiveness.*
- *A Risk Assessment identifying both the aquifer and the abstraction point(s) as potential receptor(s) of contamination including turbidity generation from groundworks.*
- *A Foundations Works Method Statement and Risk Assessment detailing the depth and type of excavations (e.g. piling) to be undertaken including mitigation measures (e.g. turbidity monitoring, appropriate piling design, off site monitoring boreholes etc.) to prevent or minimise any potential migration of pollutants including turbidity or existing contaminants such as hydrocarbons to public water*

supply. Any excavations must be undertaken in accordance with the terms of the approved method statement.

- *Acknowledgement of the need to notify Affinity Water of excavation works 15 days before commencement in order to implement enhanced monitoring at the public water supply abstraction and to plan for potential interruption of service with regards to water supply*

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

Contamination during construction:

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

Condition 2
If, during development, contamination not previously identified is found to be present at the site, then no further development shall be carried out until the following has been submitted to and approved in writing by the Local Planning Authority in consultation with Affinity Water:

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

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

Contamination through Surface Water Drainage:

Surface water drainage should use appropriate Sustainable Urban Drainage Systems that prevent the mobilisation of any contaminants where a direct pathway to the aquifer is present. This should use appropriate techniques that prevent direct pathways into the aquifer and that ensure sufficient capacity is provided for all surface water to be dealt with on site, preventing consequential flooding elsewhere. Infiltration methods, particularly deep bore soakaways, within SPZ1 should be avoided, but if proposed should be accompanied by a risk assessment on the potential impact to the abstraction point, and an appropriate number and type of treatment stages proposed to mitigate the risk. If we are not satisfied with the submissions, we will withhold our condition discharge recommendation.

It should be noted that while in discussions with the developer's agent to overcome our objection, the agent has acknowledged shallower soakaway boreholes towards 15m could be feasible (subject to detailed design) to increase aquifer protection measures. It has been agreed that this will be explored via submissions for the following condition.

Condition 3

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

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

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

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

Informative:
The construction works and operation of the proposed development site should be done in accordance with the relevant British Standards and Best Management Practices, thereby significantly reducing the groundwater pollution risk. It should be noted that the construction works may exacerbate any existing pollution. If any pollution is found at the site then the appropriate monitoring and remediation methods will need to be undertaken. For further information we refer you to CIRIA Publication C532 "Control of water pollution from construction - guidance for consultants and contractors".

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

Thank you for your consideration.

1.1.15 Herts County Council: Footpath Section – No comments received

1.1.16 Landscape Officer – Verbally raised no objection

1.1.17 National Grid – No response received.

1.1.18 National Health Service – Comments received

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

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

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

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

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

A strategic aim of the NHS HWE ICB is the improvement of primary, 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 Abbots Langley. This scheme is expected to deliver 93 homes, which based on an average occupancy of 2.4 will create circa 223.2 new patients.

These new residents will impact on North Watford PCN, which is formed of 3 GP practices and has a combined patient list of 26,000 as of 1 January 2026.

To illustrate their current capacity, individually as well as collectively, we have included a small table below.

			Surgery level			Settlement level		PCN level	
Surgery Name	Settlement	PCN	Pt list - 01/01/2026	Patients per m2	Number of patients capacity/ constraint relative to 18 per m2	Number of patients capacity/ constraint	Total NIA capacity/ shortfall	Number of patients capacity/ constraint	Total NIA capacity/ shortfall
Vine House Health Centre	Abbots Langley	North Watford	10,531	18.5	-312	1,609	89	1,609	89
Sheepcot Medical Centre		North Watford	10,505	15.0	2,095				
Abbotswood Medical Centre		North Watford	4,989	18.7	-174				

*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 two practices, Vine House and Abbotswood, are already operating above their optimal capacity, and their ability to accept additional patients is limited. The practice closest to the proposed development—Vine House Health Centre—has been seeking to relocate to new, purpose-built facilities for some time. However, due to a lack of suitable sites, these plans have not materialised, and the search for appropriate opportunities continues.

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 Abbots Langley, or other development proposals in the area.

The proposed development would deliver 93 dwellings, which based on an average occupancy of 2.4 occupants per dwelling will create circa **223.2 new patient registrations.**

223.2 new patient registrations/2000 = 0.1116 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"

0.1116 x 199 m2 = 22.2084m2 of additional space required

22.2084m2 x £7,000* per m2 = £155,458.80(*Build cost; includes fit out and fees)

£155,458.80 / 93 = £1,671.60 per dwelling (rounded up to £1,672 per dwelling)

Total GMS monies requested: 93 x dwellings x £1,672 per dwelling = £155,496 (indexed from the date of the planning permission)

The HWE ICB requests that the GMS 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.

If planning permission is granted, the HWE ICB propose to focus the GMS contribution on a new premises solution for Vine House Health Centre, as explained above, or any other primary care provision serving the development.

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

Mental Health costs:

93 dwellings x £338.92 per dwelling = £31,519.56

Community Healthcare costs:

93 dwellings x £352.68 per dwelling = £32,799.25

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

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

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

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 93 new dwellings and 223.2 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.