

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

Site CFS6 Land at Mansion House Equestrian Centre		
HCC Growth and Infrastructure	<ul style="list-style-type: none"> • Transport. An agreed access strategy should be developed should this site be taken further. HCC Highways will only support this site if significant sustainable mitigation is provided as outlined above which have been discussed with the developer and transport consultant. HCC Highways has had no contact with the developer and the transport consultant in relation to the site. • It is considered that Public Right of Way No.29 should be recognised and protected. 	
Site CFS26c West of the Kings Langley Estate		
Affinity Water	<ul style="list-style-type: none"> • Site is within or close to SPZ1 • Significant mains apparatus within site 	
Dacorum Borough Council	<ul style="list-style-type: none"> • Do not wish to object to principle of allocation; • Concerned about the wider impacts this will have on the wider village falling within the Dacorum area; • Concerns that the proposal will result in an isolated development detached from the rest of the village; • Whilst Kings Langley has potential to grow, Dacorum have sought to limit expansion taking account of historical cross boundary development, pressure on local infrastructure and issues around peak time congestion along the Watford Road; • Concerns regarding additional strain on schooling, where there is a need to work with the County Council to find a settlement wide solution for the village. In regards to this, HCC they made clear there was no identified solution to primary school education deficiency in Kings Langley; • General Road Access to the site is poor, particularly narrow, with additional concerns raised in regard to road access under narrow rail bridges at Toms Lane and Egg Farm Lane; • Dacorum Draft Local Plan includes a number of place strategies for the key settlements, recommend a similar approach in TRDC Local Plan for place making; • Note that Kings Langley Neighbourhood Plan is being progressed and consultation has just finished on this. Kings Langley Parish Council should be acknowledged as a key stakeholder. • We would welcome future cross-boundary involvement with this proposal 	
HCC Growth and Infrastructure	<ul style="list-style-type: none"> • The requirement for a new primary school to be located on this site, is welcomed. The site should be capable of accommodating a primary school up to 3fe, to also support growth proposals in Kings Langley made by Dacorum Borough Council (DBC). 	<ul style="list-style-type: none"> • The Stage 2 Green Belt Review assessed harm to the Green Belt of releasing the wider parcel (in which the site is located) as high.

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

	<ul style="list-style-type: none"> • Transport. HCC as Highways Authority have had discussions with the developer and the transport consultant in relation to Site CFS26a (Kings Langley Estate North). HCC Highways will only support this site if significant sustainable mitigation is provided as outlined above which have been discussed with the developer and transport consultant. • Would recommend increasing the size of the development and reducing housing elsewhere in the district in less sustainable locations (e.g. Site EOS12.2 (Land to the west and south of Maple Cross) and Site EOS12.3 (Land to the north of Chalfont Lane) 	<ul style="list-style-type: none"> • SA conclusions- The site is strategic in scale and its development would support a high level of infrastructure provision. It is considered that the strategic advantages of the site justify the high harm to the Green Belt in releasing the site.
Highways England	<ul style="list-style-type: none"> • Identifies the following sites to have a boundary with or close to the SRN- GT1; EOS4.0; CFS26c; GT4; P39; EOS7.0 and EOS12.2. For these sites, there will be an added level of requirements for Highways England which are likely to include issues regarding ground conditions, drainage, lighting, noise and vibration, in addition to cumulative traffic impacts • There are other draft allocated sites that are of a significant scale, and whilst these sites may not be positioned close to the SRN, they are likely to generate a level of traffic that could impact on the operation and safety of the SRN. This will only be known the from traffic modelling and assessment work that will need to be submitted as part of a future Local Plan evidence base. 	<ul style="list-style-type: none"> • Traffic modelling and assessment work that will need to be submitted as part of a future Local Plan evidence base.
Natural England	<ul style="list-style-type: none"> • Advice for developments of 100+ dwellings within the Zone of Influence of Chilterns Beechwoods Special Area of Conservation (SAC). Footprint Ecology Report concluded that there are likely significant effects upon the integrity of the SAC from the upcoming Local Plan and future Local Plans from LPAs surrounding the SAC, and subsequently identified a 12.6km Zone of Influence (ZOI) around the site. • The evidence suggested that Three Rivers District Council contributed less than 2% of visits to the SAC. As a result, they were not included as part of the strategic solution (where mitigation is required for all developments resulting in a net increase in dwellings). • It is noted that some of the proposed allocated sites EOS4.0 and CFS26c are within the Zone of Influence (<u>Chilterns Beechwoods Special Area of Conservation (dacorum.gov.uk)</u>). For larger developments that fall within the ZOI and result in a net increase of >100 dwellings we recommend further consultation with Natural England to determine the recreational impacts and any requirement for mitigation measures. • Mitigation is likely to involve contributions towards a Strategic Access Management and Monitoring (SAMM) strategy, as well as the provision of Suitable Alternative Natural Greenspace (SANG). Where SANG is proposed, this should be delivered at a minimum standard of 8 ha / 1000 population. It should also be secured in perpetuity and agreed with the respective Local Planning Authority and Natural England. 	<ul style="list-style-type: none"> • Ongoing discussion with Natural England to discuss mitigation measures should sites EOS4.0 and CFS25c be allocated for development.

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

Kings Langley Parish Council	<ul style="list-style-type: none"> • Objection to allocation. • TRDC site assessment acknowledged this land is in agricultural use and the damage to the Green Belt would be high since it makes a significant contribution to it. The Green belt forms a strategic gap between Hemel, Kings Langley, Abbots, and Watford. The TRDC’s own assessment states the site retains a strong openness and distinction from urbanising uses in Kings Langley. In summary, it is concluded that impact of development on adjacent Green Belt – which was also considered for development - would be “significant”. In addition, the overall harm to Green Belt purposes from release of the land would be “high”. • The location includes a Local Wildlife Site (LWS), which is considered of substantive nature conservation value in making an important contribution to local ecology. There are also numerous rights of way for local people to enjoy. • For potential residents and school children, the proposed development of houses and a primary school would experience continuous noise, light and air pollution from the M25; a study in The Lancet found 19% of childhood asthma cases were caused by traffic and the effects were particularly harmful upon primary school age children. • Access - the only access is from Egg Farm Lane which is a single-track farm road; widening this road would mean widening the railway bridge. The proposal includes further vehicle access from Toms Lane where it narrows as it descends towards the railway. The volume of traffic generated by 893 houses and a primary school, especially at peak hours, would lead to an unsustainable level of congestion along Toms Lane, Station Road and Primrose Hill which are heavily used by private and commercial traffic. • TRDC should acknowledge that this site on the sloping, eastern side of the Gade Valley would be a highly visible eyesore for miles around. • The size of the proposed development is disproportionate to the location at the very edge of TRDC and its proximity to Kings Langley village. 	
Site CFS8d Notley Farm (combined)		
Historic England	<ul style="list-style-type: none"> • Impact uncertain. An HIA may be helpful to confirm suitability. 	
Dacorum Borough Council	<ul style="list-style-type: none"> • Site falls within the 12.6km zone of influence of the Beechwoods Special Area of Conservation (SAC). See Natural England Guidelines. • Include Kings Langley Parish Council, as a key stakeholder • Kings Langley Neighbourhood Plan was formally adopted by Dacorum Borough Council on 18 January 2023. 	

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

Thames Water	<ul style="list-style-type: none"> The scale of development/s is likely to require upgrades to the wastewater network. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan. On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. 	
Environment Agency	<ul style="list-style-type: none"> The site falls within SPZ1 and therefore protection of groundwater must be considered. 	
Abbots Langley Parish Council	<ul style="list-style-type: none"> Object to site Concerns over building in the Green Belt Development of this site plus site EOS4.0 would constitute over development of Abbots Langley If site EOS4.0 were removed from consideration, we would support use of site CFS8d if the North boundary were reduced to avoid urban sprawl 	
Kings Langley Parish Council	<ul style="list-style-type: none"> TRDC site assessment acknowledges land is in agricultural use and damage to the Green Belt would be high as it makes a significant contribution to it; site would result in the merger of the gap (physical and visual merger of the gap) and concludes impact on Green Belt openness would be significant; Concerns over Local Wildlife Site; ROW; potential noise, light and air pollution from M25; Concerns over access from Egg Farm Lane a single-track farm road; volume of traffic likely to be generated by this significant development leading to unsustainable levels of traffic congestion; Size of the proposed development is disproportionate to the location at edge of TRDC and proximity to Kings Langley Village 	
HCC Growth and Infrastructure	<p>Transport</p> <ul style="list-style-type: none"> Clarification over off-site links for all transport modes are needed. East Lane and Woodside Road present significant, if not fundamental policy and technical challenges. The level of services and facilities serving the local area is not extensive and demonstrating how this allocation could be considered sustainable in a transport context is likely to be challenging. Should adjoining sites be allocated within the emerging local plan, all the sites allocated in the local area should be controlled by a single policy that secures high levels of permeability for sustainable modes, such as a comprehensive masterplanning approach. The green space allocation will need an on-site specific policy, and clarification around intended users. 	

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

	<ul style="list-style-type: none"> • Significant clarification, policy and technical work is required, in order to make this an acceptable allocation within the emerging local plan. At this stage, it is unclear how the site can meet the requirements of the NPPF, policies of the emerging local plan or HCC's LTP. 	
Natural England	<ul style="list-style-type: none"> • Review of the additional sites indicates that at least 4 of these allocations, namely NSS10: Land at Mill Place, Hunton Bridge; CFS26e: Kings Langley Estate South; NSS14: Margaret House, Abbots Langley and CFS8d: Notley Farm, Abbots Langley appear to trigger NE's SSSI Impact Risk Zones for residential development. These are likely to require consultation with Natural England. • Recommends further consultation with Natural England to determine the recreational impacts and any requirement for mitigation measures for developments of 100+ dwellings within the Zone of Influence of Chilterns Beechwoods Special Area of Conservation (SAC). • The mitigation is likely to involve contributions towards a Strategic Access Management and Monitoring (SAMM) strategy, as well as the provision of Suitable Alternative Natural Greenspace (SANG). Where SANG is proposed, this should be delivered at a minimum standard of 8 ha / 1000 population. It should also be secured in perpetuity and agreed with the respective Local Planning Authority and Natural England. <p>LEADS – Ecology. None known</p> <p>LEADS – Historic Environment</p> <ul style="list-style-type: none"> • This site includes, or has the potential to include, heritage assets with archaeological interest. However, depending upon the number of dwellings proposed within this potential allocation, it is not considered that this will be a constraint, provided appropriate mitigation is in place within the emerging local plan and through the imposition of planning conditions, should a planning application be submitted and approved. <p>Lead Local Flood Authority (LLFA)</p> <ul style="list-style-type: none"> • Drainage and flood risk- this site could be appropriate for allocation, if the appropriate measures are properly considered, along with national and local policy being taken into account. <p>Public Rights of Way (PRoW)</p> <ul style="list-style-type: none"> • Should the site be allocated, and a subsequent planning application is submitted, it is likely that a contribution is required to improve local routes to enable active travel (pedestrian) and support the predicted increased recreational use. 	

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

Site PCS21 Land at Love Lane		
Historic England	<ul style="list-style-type: none"> Site is not justified from a historic environment perspective. Heritage Impact Assessment required prior to allocation to confirm the suitability of the site, to determine its extent and capacity, and to inform any development criteria that may be required in order to avoid or mitigate any harm identified 	Representations by Historic England to be taken into consideration.
Dacorum Borough Council	<ul style="list-style-type: none"> Working in partnership with St Albans, HCC, and Crown Estate to bring forward major proposals involving northern and eastern expansion of Hemel Hempstead; Would be sensible to explore potential cross-boundary linkages between the project and growth in/ around Bedmond and along roads connecting to Hemel Hempstead 	The Stage 2 Green Belt Review assessed harm to the Green Belt of releasing the wider parcel (in which the site is located) as moderate.
HCC Growth and Infrastructure	<ul style="list-style-type: none"> Site is located adjacent to Site CFS6 (Land at Mansion House Equestrian Centre) and as such it would be better if both sites are considered together particularly in relation to constraints associated with Love Lane. HCC Highways will only support this site and CFS6 (either site, alone or together going forward) if significant sustainable mitigation is provided. The proposed vehicular access from Love Lane onto Tibbs Hill Road / Bedmond Road is likely to be unsuitable due to current width / ownership constraints. As with site CFS6, Love Lane may require improvement if it is planned as a main pedestrian route. Transport. An agreed access strategy should be developed should this site be taken further. HCC Highways have had no contact with the developer and the transport consultant in relation to the site. Site is located next to Site EOS4.0 (Land adjacent to Bedmond Road and South of M25), Site CF56 (Land at Mansion House Equestrian Centre) and Sites CFS8a, b and c (Notley Farm, Bedmond Road) that are no longer being taken forward as part of the Local Plan. It would be better if these sites are considered together to overcome highlighted constraints. 	Noted. HCC Representation will be taken into consideration when refining site allocations at Regulation 19.
Site EOS4.0 Land adjacent to Bedmond Road & South of M25		
Historic England	<ul style="list-style-type: none"> At present this site is not justified from a historic environment perspective. Heritage Impact Assessment required prior to allocation to confirm the suitability of the site, to determine its extent and capacity, and to inform any development criteria that may be required in order to avoid or mitigate any harm identified 	
Dacorum Borough Council	<ul style="list-style-type: none"> Working in partnership with St Albans, HCC, and Crown Estate to bring forward major proposals involving northern and eastern expansion of Hemel Hempstead; Would be sensible to explore potential cross-boundary linkages between the project and growth in/ around Bedmond and along roads connecting to Hemel Hempstead 	<ul style="list-style-type: none"> Ongoing DTC discussions with DBC regarding cross-boundary issues.

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

<p>HCC Growth and Infrastructure</p>	<ul style="list-style-type: none"> • Children’s Services (Early Childhood Services). There is currently childcare provision available in area; therefore, impact on this will be minimal. Any comments in relation to this site would be covered by the allocation at Woodside Road, especially if the extension into CFS3 can be secured. • Transport. Transport- Access: There is no existing vehicular access onto the site. HCC Highways have stated that it is unclear how a suitable access strategy could be delivered and that Lavrock Lane and All Saints Lane are not publicly maintained highways and therefore it is unlikely that access could be taken from these roads. HCC Highways also stated that access from the A412 would be extremely complex and would have a significant impact on the viability of the site. • HCC as Highways Authority has had discussions with the developer and the transport consultant in relation to the site in conjunction with sites CFS8a, b and c (Notley Farm, Bedmond Road) to the south. These discussions have been very general and have focused primarily on development coming forward on Sites CFS8a, b and c (Notley Farm, Bedmond Road). • It is suggested that a joint approach for policy and master planning with sites EOS4.0, PCS21 and CFS6 is potentially considered, with a joint master planning policy possibly presenting the best design and access opportunities for all three sites. 	<ul style="list-style-type: none"> • The site is located in the Green Belt. The site is located in two parcels that were assessed in the Stage 2 Green Belt Review. Harm to the Green Belt of releasing the wider parcel (in which the western part of the site is located) was assessed as high. • Harm to the Green Belt of releasing the parcel (in which the eastern portion of the site is located) was assessed as moderate. • <u>The SA concludes this site is not suitable, available, or achievable.</u>
<p>Highways England</p>	<ul style="list-style-type: none"> • Identifies the following sites to have a boundary with or close the SRN- GT1; EOS4.0; CFS26C; GT4; P39; EOS7.0 and EOS12.2. For these sites, there will be an added level of requirements for Highways England which are likely to include issues regarding ground conditions, drainage, lighting, noise and vibration, in addition to cumulative traffic impacts • There are other draft allocated sites that are of a significant scale, and whilst these sites may not be positioned close to the SRN, they are likely to generate a level of traffic that could impact on the operation and safety of the SRN. This will only be known the from traffic modelling and assessment work that will need to be submitted as part of a future Local Plan evidence base. 	<ul style="list-style-type: none"> • Traffic modelling and assessment work that will need to be submitted as part of a future Local Plan evidence base.
<p>Natural England</p>	<ul style="list-style-type: none"> • Advice for developments of 100+ dwellings within the Zone of Influence of Chilterns Beechwoods Special Area of Conservation (SAC). Footprint Ecology Report concluded that there are likely significant effects upon the integrity of the SAC from the upcoming Local Plan and future Local Plans from LPAs surrounding the SAC, and subsequently identified a 12.6km Zone of Influence (ZOI) around the site. • The evidence suggested that Three Rivers District Council contributed less than 2% of visits to the SAC. As a result, they were not included as part of the strategic solution (where mitigation is required for all developments resulting in a net increase in dwellings). 	<ul style="list-style-type: none"> • Ongoing discussion with Natural England to discuss mitigation measures should sites EOS4.0 and CFS25c be allocated for development.

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

	<ul style="list-style-type: none"> It is noted that some of the proposed allocated sites EOS4.0 and CGS25c are within the Zone of Influence (<u>Chilterns Beechwoods Special Area of Conservation</u> (dacorum.gov.uk)). For larger developments that fall within the ZOI and result in a net increase of >100 dwellings we recommend further consultation with Natural England to determine the recreational impacts and any requirement for mitigation measures. Mitigation is likely to involve contributions towards a Strategic Access Management and Monitoring (SAMM) strategy, as well as the provision of Suitable Alternative Natural Greenspace (SANG). Where SANG is proposed, this should be delivered at a minimum standard of 8 ha / 1000 population. It should also be secured in perpetuity and agreed with the respective Local Planning Authority and Natural England. 	
<p>Site OSPF22 Batchworth Golf Course</p>		
Historic England	<ul style="list-style-type: none"> Concerns about the potential allocation of sites OSPF22 and CFS59. This land provides part of the rural setting for Moor Park, and filling-in this open land with new development has the potential to cause a moderate to high level of harm to this highly designated landscape. A Heritage Impact Assessment should be undertaken to consider the suitability of the site for development in terms of the impact upon the historic environment and also, if the site is found suitable, recommends appropriate mitigation which should then be incorporated into Policy. Given the scale and relative complexity of development proposed, advises that a masterplanning exercise / Concept Framework is carried out prior to a planning application being submitted and determined. This work should be informed by and reflect the findings of the detailed HIA, and again this should be stipulated in policy. 	
Sport England	<ul style="list-style-type: none"> Objects to potential allocation Playing Pitch Strategy concluded existing supply of golf facilities including Batchworth can meet current and future demands (any loss of a facility would mean that existing provision would not meet needs) Playing Pitch Strategy specifically recommends 'Retain course and sustain quality through appropriate maintenance. Explore opportunities to increase membership.' If proposed for development, it will need to comply with paragraph 99 of the NPPF in relation to the loss of sports facility provision. if this site is to be considered for allocated for residential following this consultation, the following course of action is recommended: Before a decision is made about allocating the site, an objective golf facility needs assessment (as advised in the Playing Pitch Strategy) should be prepared which assesses local golf facility needs in detail to identify whether there are adequate alternative similar golf facilities in the local area that could meet the demand that this facility currently provides for. 	<ul style="list-style-type: none"> Noted. The site is in multiple ownership. Three Rivers District Council owns a proportion of the site (Sandlefield Spring and The Grove) and is not promoting these areas for development. The site is located in the Green Belt. The site falls into three parcels assessed in the Stage 2 Green Belt Review. Release of the parcel (in which the majority of the site is located, to the north) was assessed as leading to high harm to the Green Belt. Areas of the site to the east, along London Road (Site CFS59 and the area of the clubhouse, car park and Batchworth Hill

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

		<p>House), were assessed as leading to moderate-high harm to the Green Belt if released. The remainder of the site, to the south and along the western boundary, were not assessed in the Stage 2 Green Belt Review; the Stage 2 Green Belt Review states that the release of any land outside the assessment area would result in at least high harm to the Green Belt.</p> <ul style="list-style-type: none"> • The SA assessment concludes the site is not suitable and part of the site may be deliverable. • The Councils Playing Pitch strategy 2018 concluded that the current supply of golf facilities in Three Rivers district (including this site), can meet current and future demand. In anticipation that some golf courses may be promoted as local plan development allocations, the strategy's action plan (page 28) made it clear there is a need to carry out a full golf facility needs assessment.
Affinity Water	<ul style="list-style-type: none"> • Sites within or close to SPZ1 need to take into consideration Environment Agency guidance. 	
Batchworth Community Council	<ul style="list-style-type: none"> • States that the Batchworth Park Golf Club have a long lease on the property to 2096 and are opposed the development – that development can't go ahead unless members agree • Concerns about the Scale of development, increase in traffic and congestion (London Rd, Moor Lane, Riverside Drive, Harefield Rd, Sherfield Avenue, Harefield Rd, and wider area), flooding, sewerage system capacity, and wildlife. • Secondary school provision and open spaces already oversubscribed in Rickmansworth. 	<ul style="list-style-type: none"> • Noted. It is in the landowner's remit to deal with issues relating to the current lease. They would have to demonstrate that the land was deliverable within the Plan period. • HCC as the education authority are responsible for provision of schools.
HCC Growth and Infrastructure	<ul style="list-style-type: none"> • An agreed access strategy should be developed for this site, in order for it be taken further, including an understanding of constraints in the local network for all modes, existing provision, severance and safety issues. • Any new vehicle access onto the A404 requires specific engagement with HCC and should be conducted prior to the site progressing. 	

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

	<ul style="list-style-type: none"> The indicative masterplan does not demonstrate provision of walking and cycling routes on the shortest/most efficient desire lines to services and facilities and the local network lacks suitable walking and cycling infrastructure to realistically enable cycling journeys to be made across the existing settlement. Public transport would need substantial bus service improvement contributions and the site is currently remote from existing services. The shape of site is considered not to be that good for bus operations, with limited frontage onto A404 (would have to be a loop to ensure dwellings within recommended 400m walking distance of a bus stop). This would be critical in accessing facilities and rail services within Rickmansworth. 	
Site CFS59 Land on London Road, Rickmansworth		
Historic England	<ul style="list-style-type: none"> A Heritage Impact Assessment should be undertaken which considers the suitability of the site for development in terms of the impact upon the historic environment and also, if the site is found suitable, recommends appropriate mitigation which should then be incorporated into Policy. Advise that a masterplanning exercise / Concept Framework is carried out prior to a planning application being submitted and determined, given the scale and relative complexity of site. This work should be informed by and reflect the findings of the detailed HIA, and again this should be stipulated in policy. 	
Batchworth Community Council	<ul style="list-style-type: none"> Objections- too many houses for the plot. Overdevelopment- site is next door to the proposed 619 house site and also leads down to the 60-dwelling site at the bottom of London Road. Concerns over flooding, traffic, and pollution on London Road. 	
HCC Growth and Infrastructure	<ul style="list-style-type: none"> The proposed use as a residential care home is not the optimal usage for this site, a new nursing care home is being delivered in the district by HCC and the units delivered here align with the proposed increase in demand of nursing care. Transport- Recognition of site OSPF22 should be made if both sites are allocated forward. 	
Site EOS7.0 Land to the south of Shepherds Lane and west of the M25		
Affinity Water	<ul style="list-style-type: none"> Site is within or close to SPZ1 Significant mains apparatus within site 	
Denham Parish Council	<ul style="list-style-type: none"> Concern about the traffic generated from the site will be transiting along the A412 	
HCC Growth and Infrastructure	<ul style="list-style-type: none"> As this is a large development site, HCC would use this opportunity to promote older persons accommodation scheme within the wider development. 	

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

	<ul style="list-style-type: none"> • There is no childcare provision in the vicinity of the development; however, the requirement for a new primary school to be located on this site, as stated within the supporting text, is welcomed • An agreed access strategy should be developed, should this site be taken further including an understanding of constraints in the local network for all modes, existing provision, severance and use of the existing network and associated junctions. Bus stops closest to the site only have limited services available. There could be potential for a service extension into the site, although this would need further investigation and substantial developer contributions to facilitate. 	
Highways England	<ul style="list-style-type: none"> • Identifies the following sites to have a boundary with or close the SRN- GT1; EOS4.0; CFS26C; GT4; P39; EOS7.0 and EOS12.2. For these sites, there will be an added level of requirements for Highways England which are likely to include issues regarding ground conditions, drainage, lighting, noise and vibration, in addition to cumulative traffic impacts • Concerns about the cumulative impact of other developments on the SRN. 	<ul style="list-style-type: none"> • Traffic modelling and assessment work will need to be submitted as part of a future Local Plan evidence
Site CFS18b Hill Farm, Stag Lane		
Affinity Water	<ul style="list-style-type: none"> • Site is within or close to SPZ1 • Significant mains apparatus within site 	
Thames Water	<ul style="list-style-type: none"> • The scale of development/s is likely to require upgrades to the wastewater network. • Local Planning Authority should liaise with Thames Water at the earliest opportunity to agree a housing and infrastructure phasing plan 	
Chorleywood Parish Council	<ul style="list-style-type: none"> • Concerns about site suitability due to presence of PRW, open space and biodiversity importance- Without this corridor the biodiversity and ecological sustainability of Warings Field will be significantly negatively impacted. • Map omits two PRWs • Site is at least a 25-minute walk to the nearest services and facilities using very steep roads. Therefore, this site cannot be categorised as a “Sustainable Location” under SA11. • Site CFS18b ii) has been evaluated to make a significant contribution to the Green Belt with release for development having a Moderate / High Impact on the overall Green Belt. This latter evaluation is considered to be incorrect as it ignores one of the five key purposes of Green Belt defined by the NPPF – “to preserve the setting and special character of historic towns”. 	<p>Noted. National policy allows for reviewing Green Belt boundaries to accommodate growth where exceptional circumstances have been demonstrated. The Council has:</p> <ul style="list-style-type: none"> • Reviewed the housing densities and capacities of all potential sites located within settlement boundaries • Applied a significant uplift in the average density of residential development • Assessed the utilisation of local vacant housing stock • Reviewed the achievability and deliverability of Three Rivers’ own land assets. • Contacted owners/occupiers of potential brownfield sites who had not yet submitted any of their land holdings, and

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

		<ul style="list-style-type: none"> • Contacted neighbouring authorities about accommodating unmet need.
HCC Growth and Infrastructure	<ul style="list-style-type: none"> • Variations of the site have been discussed but of a different scale. The new scale will require clarification in terms of any previously explored mitigation measures as the surrounding highway network has a range of constraints that could impact delivery. • There are bus services that run along Stag Lane and Long Lane, but these are extremely limited, and these roads are generally not suitable for bus operation. This site is not large enough to facilitate service improvements for an adequate period or generate patronage that would make any such improvements viable in the long term. 	
Site EOS12.2 Land to the west and south of Maple Cross		
Historic England	<ul style="list-style-type: none"> • While development of the site appears feasible, we recommend the preparation of Heritage Impact Assessment (HIA) to inform the masterplanning of the site. This work should be informed by and reflect the findings of the detailed HIA, and this should be stipulated in policy. 	
Affinity Water	<ul style="list-style-type: none"> • Site is within or close to SPZ1 	
Denham Parish Council	<ul style="list-style-type: none"> • Concerned about the scale and timing of development (1778 houses in the first 10 years of plan) in addition to EOS7.0 in Mill End a total of 2500 new houses. Requests that the scale of development is reduced in terms of housing and timeframe of delivery spread over a longer period • Unreasonable to put development in one area and requests that development is spread across the wider TRDC area • Concern about further congestion and pollution on the A412 which is the main road and highly congested due to M25 	<ul style="list-style-type: none"> • The site is strategic in scale and would provide supporting infrastructure. This includes: a primary education extension to Maple Cross JMI and Nursery School, parkland (including play space), a local centre including local shops, community facilities, a nursery and flexible commercial space, a 90-bed extra care home, improved bus stops and an extended bus route through the site as well as pedestrian and cycle routes. • Proposed development site has been selected through the SHELAA process and cannot be proportioned across the settlements equally due to limited sites within TRDC to meet future housing needs. Whilst the extension to Maple Cross is substantial there are other major sites proposed across the District. • The timescales for delivery take account of the Council's SHELAA and are considered

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

		<p>to be reasonable and based on realistic assumptions.</p> <ul style="list-style-type: none"> Traffic and congestion are an issue in the area and comments from Hertfordshire Highways will be considered as well as the findings from the Transport Assessment which will include looking at the A412.
Chalfont St Peter Parish Council	<ul style="list-style-type: none"> Concerns over adverse effect of site allocation on biodiversity and health and wellbeing of residents. 	
Buckinghamshire Council	<ul style="list-style-type: none"> Site allocations close to the Buckinghamshire boundary- the potential impacts of development sites at Maple Cross were referred to in the response of Chiltern and South Bucks Councils to the Three Rivers DC Call for Sites consultation (19.12.2018). There was a request from Chiltern and South Bucks Councils that the authorities worked together to address potential traffic and infrastructure impacts as these were a particular concern at the time. The site references were CFS 34A, CFS34 and CFS 32. The consultation documents do not make clear how traffic impacts may be mitigated. Transport modelling-Buckinghamshire Council would like to be involved in this and consider its results, for example proposed mitigations to address cross – boundary impacts. Site EOS12.2 will also be required to provide primary education, bus stops, an extended bus route and GP facilities. This is welcomed as it will help deal with the infrastructure impacts of these proposals. 	<ul style="list-style-type: none"> Ongoing DTC discussions with HCC Transport and Buckinghamshire Council on cross-boundary issues.
HCC Growth and Infrastructure	<ul style="list-style-type: none"> HCC welcomes the inclusion of a care home within the supporting text for this site. The education requirement is expected to be more than an extension to the existing Maple Cross JMI. The tiered approach indicates that 1,500 residential units on a tier 1 site would mean an additional 3.75fe of additional pupil yield. Sites EOS12.3 and CFS31 would add an additional 231 dwellings / ~0.5fe to those totals. HCC therefore considers that a more acceptable approach will be to allocate a site for a new 3fe primary school within this potential housing site allocation, along with the land to facilitate expansion of Maple Cross JMI. Transport. Discussions between the developer and HCC as Highways Authority have taken place, regarding the work that may need to be undertaken, in order to achieve a LTP4 compliant site should this site be allocated within the emerging local plan. HCC Highways will only support this site if significant, sustainable mitigation is provided as outlined above which has been discussed with the developer and transport consultant. 	

Appendix 5 – Summary of Strategic Sites / Main Issues Raised – Statutory Consultees

	<ul style="list-style-type: none"> HCC would recommend exploring reducing the size of the site and providing additional housing elsewhere in the district in more potentially sustainable locations. 	
Highways England	<ul style="list-style-type: none"> Identifies the following sites to have a boundary with or close the SRN- GT1; EOS4.0; CFS26C; GT4; P39; EOS7.0 and EOS12.2. For these sites, there will be an added level of requirements for Highways England which are likely to include issues regarding ground conditions, drainage, lighting, noise and vibration, in addition to cumulative traffic impacts Concerns over other draft allocated sites that are of a significant scale, and whilst these sites may not be positioned close to the SRN, they are likely to generate a level of traffic that could impact on the operation and safety of the SRN. This will only be known the from traffic modelling and assessment work that will need to be submitted as part of a future Local Plan evidence base. 	<ul style="list-style-type: none"> Need to undertake further traffic modelling and assessment work to inform local plan evidence base.