



Local Plan

Summary of the “Three Rivers’ Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land (Part 4) Regulation 18 Consultation

June 2024

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1.0 Introduction

- 1.1 Three Rivers District Council (TRDC) is preparing a new Local Plan, which will eventually replace the current Core Strategy (2011), Development Management Policies LDD (2013) and Site Allocations LDD (2014).
- 1.2 In October 2023, TRDC undertook the “Three Rivers’ Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land” (Part 4) Regulation 18 consultation.
- 1.3 This statement summarises the Part 4 consultation including how we consulted, who was invited to make representations, the comments that were received and the concerns raised, all of which have influenced the preparation of the emerging Local Plan.

2.0 Previous Regulation 18 Consultations

- 2.1 Prior to the part 4 consultation, TRDC undertook three Town and Country Planning (Local Development) (England) Regulations 2012 (Regulation 18) consultations, as detailed below:
 - Local Plan ‘Issues & Options and Call for Sites Consultation Document’, July 2017
 - Local Plan “Preferred Policy Options” (Part 1) and “Sites for Potential Allocation (Part 2)” Document, June 2021
 - Local Plan “Additional Sites for Potential Allocation” (Part 3), January 2023

3.0 Three Rivers’ Preferred Local Plan Lower Housing Growth Option Protecting More Green Belt Land” (Part 4) Regulation 18 consultation.

- 3.1 The consultation methods adopted by the Council were in accordance with the Councils Statement of Community Involvement, (June 2021).
- 3.2 The consultation ran from Friday 27 October 2023 for a period of six weeks, ending on Sunday 10 December 2023. Emails were sent to almost 1600 people and organisations registered on the local plan consultation database, including statutory consultees, site owners and developers, and members of the public. The consultation was advertised in the Watford Observer and online through the Three Rivers District Council website and social media. Leaflets were also delivered to households across the district to inform residents about the consultation and encourage them to respond. For the first time in the process of making the new Local Plan, the Have Your Say platform was used, and the majority of responses were received through this form. A small number of letter and email comments were also received.
- 3.3 A total of 17,036 formal responses were received from 957 respondents (26 Statutory Consultees, 31 Landowners/Developers and 900 general public) through the part 4 consultation. Respondents included residents, statutory and non-statutory consultees and other interested groups and organisations. 1153 responses were received by post or email and 15,883 responses were received through the online consultation form.

3.4 Public Respondents

3.5 Within the Have Your Say platform, public respondents were asked a series of optional questions to help to understand the demographic makeup of respondents. It is important to note that representations sent via email and letters did not contain demographic information.

3.5.1 The 'about me' section (see Figure 1 below) indicated that a large majority of respondents using the Have Your Say platform were residents in the Three Rivers District. A large amount were also those that own a property in Three Rivers while there were a smaller number of those who own a business, worked or were a student in the area.

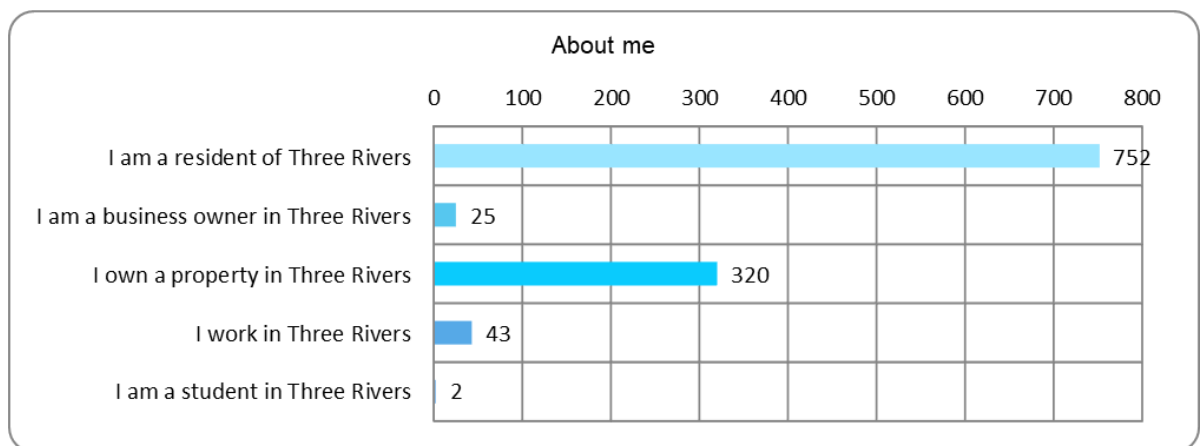


Figure 1. Summary of "about me" section within the Have Your Say platform

3.5.2 In terms of age, respondents (from Have Your Say) by decade born shows a large generational disparity between respondents (see Figure 2 below). Well over half of all public responses (from Have Your Say) came from those born prior to 1970 and as few as 21 came from those born from 1990 onwards. The largest group was those born between 1950 and 1959 with a total of 240. It is evident from Figure 2 that there has been a lack of engagement from young people and further efforts need to be made to encourage young people to comment, given that they may have differing viewpoints and priorities.

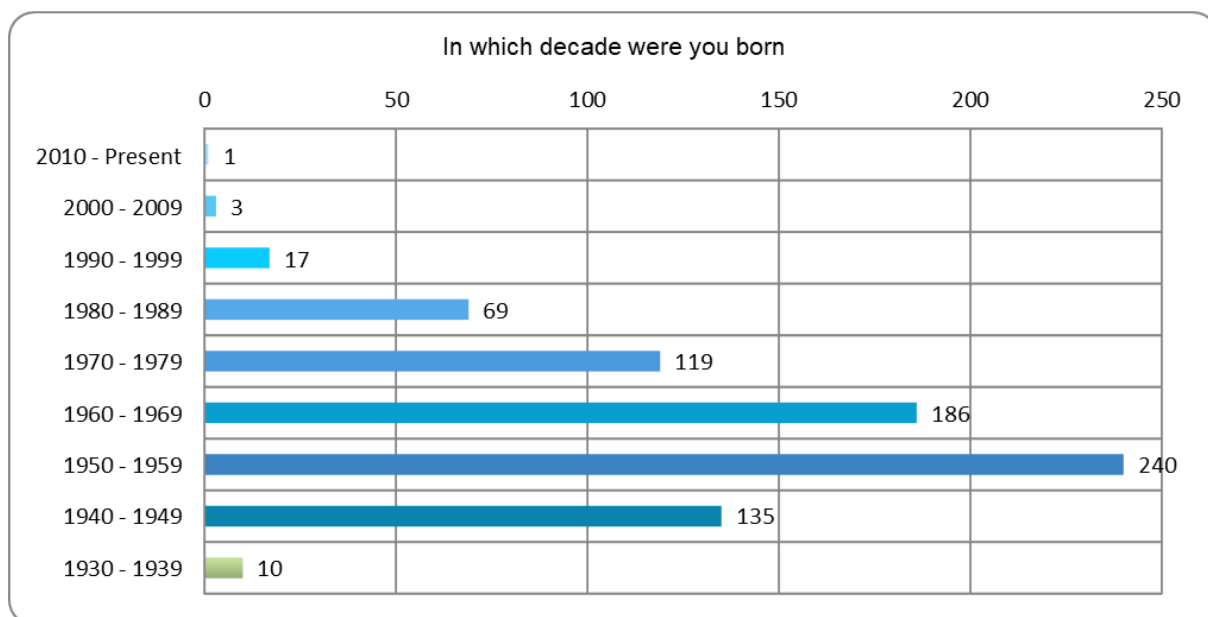


Figure 2. Summary of the decades in which the Have Your Say respondents were born

3.5.3 In terms of gender, the majority of respondents identified as a man, while there were 133 fewer responses from those who identified as a woman (see Figure 3 below).

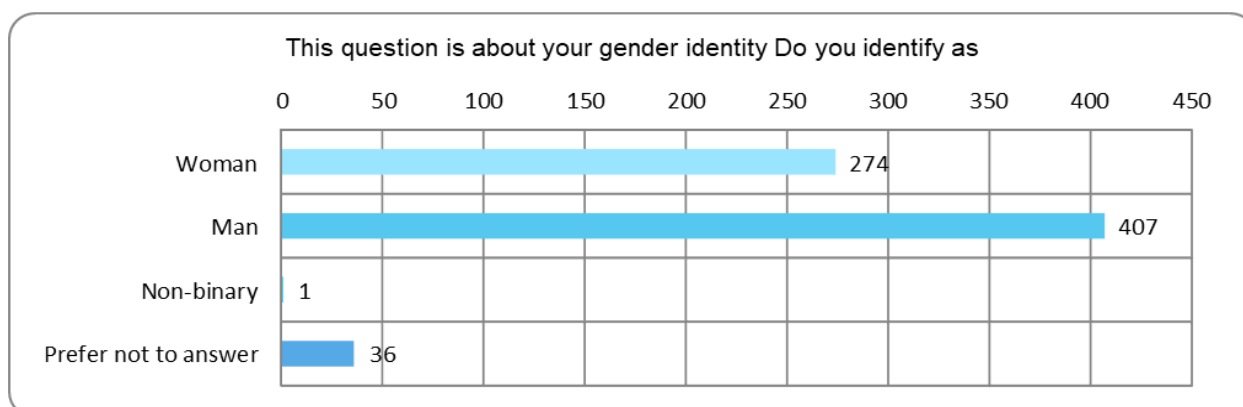


Figure 3. Summary of the gender identity of the Have Your Say respondents

3.5.4 In terms of ethnicity (see Figure 4 below), a large majority of respondents described themselves as White-British. The next largest ethnicity was those who described themselves as Asian or Asian British-Indian with a total of 46 respondents. This generally aligns with the ethnic breakdown of the district, which is predominantly White (77.1%) followed by the second largest ethnicity group “Asian British” (15.2%)¹. However, it must be noted that minimal representations were received from other ethnic minority groups such as Chinese and Black/Black British.

¹ <https://cdn.threerivers.gov.uk/files/2023/12/b46b2810-9f22-11ee-b0f6-2594c895ecd8-Equality%2C%20Diversity%20and%20Inclusion%20Policy%202023-26.pdf>

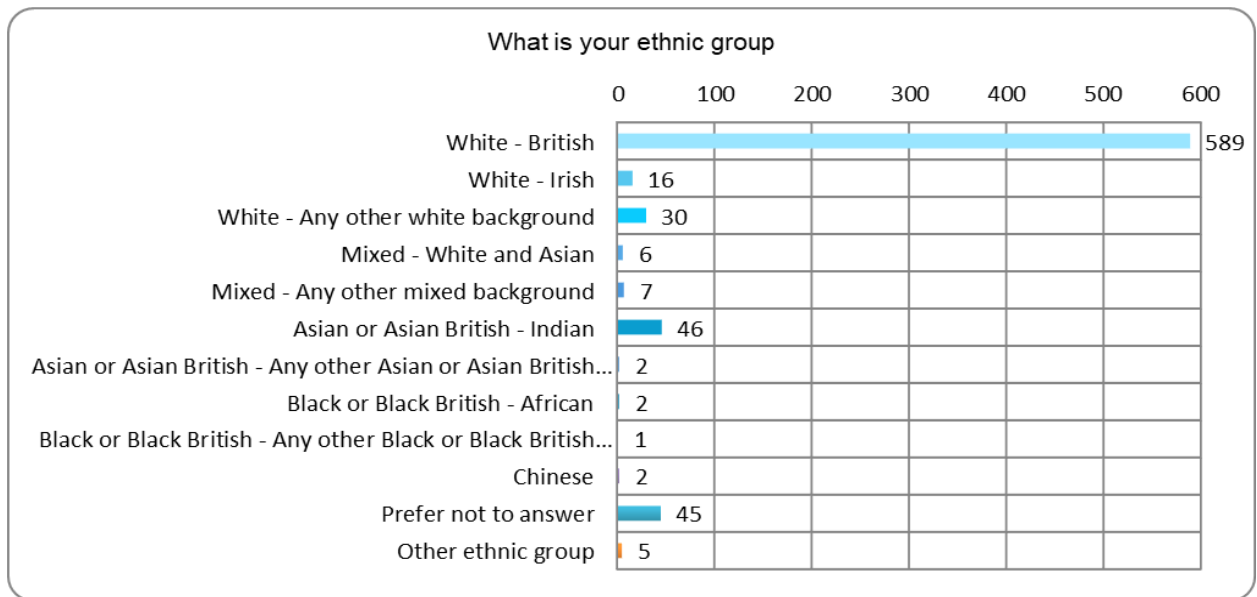


Figure 4. Summary of the ethnicity of the Have Your Say respondents

3.5.5 Have Your Say respondents were also asked what the beginning of their postcode was to ascertain which specific areas in the district responses were coming from. Additionally, to be accepted letters and emails had to include the address of the respondent. As set out in Figure 5 below, the area with the largest number of responses was Croxley Green, with a total of 241. Chorleywood, Rickmansworth and Carpenders Park also provided a high number of responses with 149, 103 and 77 respectively. A total of 20 responses originated from outside of the district.

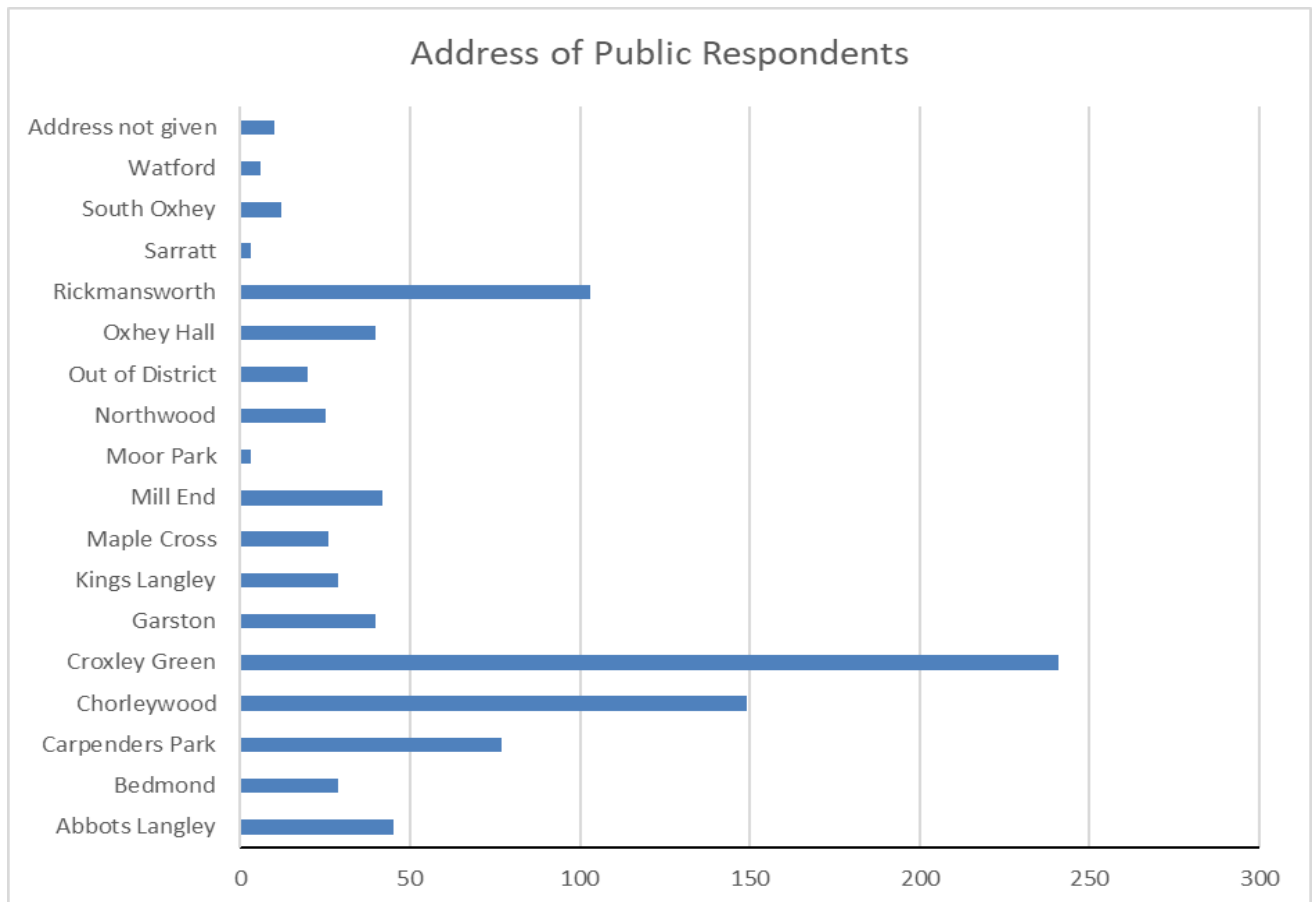


Figure 5. Summary of addresses of all public respondents (Have Your Say platform, emails and letters combined)

3.6 Statutory Consultee Responses

3.6.1 The statutory consultee's responses related to their areas of expertise and identified mitigation measures to be considered as part of new developments.

3.6.2 With regards to services operators including National Grid, National Gas, Affinity Water and Thames Water, these statutory consultees remained neutral or generally did not provide comments for questions 1-6. However, Thames Water did set out that as a result of the low growth approach, overall, the reduced levels of development would have a lesser impact on the sewerage network and capacity at sewage treatment works, although localised network upgrades are likely to be required. Affinity Water stated that *"the pressures at the critical points in the network due to the new developments are such that major reinforcements in the network in the Three River District Council area will be required. This normally means new pipelines although in some cases new pumping stations will also be required. There is sufficient water supply in the region"*. Affinity Water also highlighted growth in nearby neighbouring authorities which would increase demand further.

3.6.2.1 Services operators including Affinity Water and Thames Water provided site specific comments. Affinity Water listed sites within different categories including those within "Groundwater Source Protection Zones", "significant mains apparatus within site", "significant mains apparatus in the vicinity of site boundaries" and "existing sites with current distribution mains" and provided guidance for each category. Thames Water

also provided comments for each site listed within the part 4 consultation. Overall, Thames Water set out they “do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability” for all of the sites, including the two strategic sites.

3.6.3 Six neighbouring authorities provided comments on the Part 4 Regulation 18 consultation including Watford Borough Council, Dacorum Borough Council, Buckinghamshire Council, St Albans District Council, Hertsmere Borough Council and Harrow Council.

3.6.3.1 Harrow Council was the only neighbouring authority to generally agree with Three Rivers’ non-compliance with the Standard Method and low growth approach, concluding that the “London Borough of Harrow no longer hold an objection to this aspect of the plan” (release of Green Belt, particularly sites near the shared boundary).

3.6.3.2 Whilst Watford Borough Council, Dacorum Borough Council, St Albans District Council and Hertsmere Borough Council did not outright answer “no” to questions 1-4, they raised concerns regarding TRDC’s non-compliance with the Standard Method figure, that neighbouring authorities would likely not be able to meet any unmet need and the potential un-soundness of the plan as a result of the proposed housing figures. It was advised that a robust justification and evidence would be required for the low growth approach. The importance of further Duty to Co-operate work was also emphasised. Watford Borough Council also provided site specific comments for the following proposed sites, a summary of which can be seen below:

H6 Hill Farm Industrial Estate Leavesden:

No objections to residential development, however, raised concerns about a shortfall of industrial land in Watford with only 25% of its need being met through site allocations and that the loss of TRDC industrial land will not positively contribute to resolving this shortfall. Welcome protection and allocation of land for industrial use.

CFS4 Land at Warren Court, Woodside Road:

Whilst the site is not presently used for allotments, there may be a shortfall for allotments in North Watford. Would welcome dialogue regarding meeting shared objectives.

NSS10 Land at Mill Place, Hunton Bridge:

Important to integrate the canal setting into the design of any future development.

CFS61 Cinnamond House:

Would like Three Rivers to consider if there are implications for site CFS61 and delivery of Watford to Croxley Link (W2CL) and referred to site MU18 in the Watford Local Plan which safeguarded an area of land to support a mass rapid transport interchange/station.

3.6.3.3 Buckinghamshire Council specifically answered “no” to question 1 referring to potential consequences of LPA’s not meeting the level of housing growth set out by

the Standard Method and set out that there is no scope for Buckinghamshire to meet any unmet need. With regards to potential sites, Buckinghamshire Council stated that **EOS12.4 Land West and South of Maple Cross** is not an appropriate development site, citing potential transport impacts. They requested that Buckinghamshire Council is involved in preparation of transport evidence at the site.

3.6.4 Three Parish Councils from within Three Rivers provided comments including Chorleywood Parish Council, Croxley Green Parish Council and Watford Rural Parish Council. A further three Parish Councils from outside of the district also provided comments to the part 4 consultation including Nash Mills Parish Council, Denham Parish Council and Chalfont St Peter Parish Council. All six of the Parish Councils agreed with TRDC not complying with the Standard Method calculation and the low growth approach. The justification for this included referencing the NPPF, that the Standard Method is not an appropriate way to calculate housing need, that the approach would protect the Green Belt and reduce stress on local infrastructure and services.

3.6.4.1 With regards to comments on specific sites, Chorleywood Parish Council provided comments on **CFS16 Land at Chorleywood Station** (neither agrees or disagrees that this site is an appropriate development site, however raised concerns), **CFS18c Hill Farm, Stag Lane** (agree that the site is an appropriate development site, however raise concerns). Some of the concerns for the sites included:

- Request a Master Plan and site layout plans prior to allocation within the plan
- Concerns about impact on character and Conservation Area
- Concerns about potential loss of station car parking
- Concerns about impact of railway on new residents
- Access, parking and highway safety concerns
- Concerns regarding potential loss of Public Right of Way and request buffer.
- Concerns about impacts to wildlife
- Concerns about whether the location is sustainable, particularly in relation to pedestrians and cyclists
- A defensible boundary of Green Belt should be retained
- Need further investigation with regards to sewerage capacity
- Concerns regarding density
- Infrastructure concerns

3.6.4.2 Chorleywood Parish Council also provide comments for **NSS23 Chorleywood Telephone Exchange, ACFS1 Heath House Rickmansworth Road, CW9 Garages at Copmans Wick** and **P4a Quickwood Close Garages**. The Parish Council did not raise objections to these sites.

3.6.4.3 Croxley Green Parish Council stated that the following sites were appropriate sites for development; **CFS 20 Land at Croxley Station, CG16 Garages Owen's Way, CG47 Garages off Grove Crescent, H9 33 Baldwins Lane** and **CFS61 Cinnamond House**. However, concerns were raised for these sites including:

- Concerns relating to parking and loss of station parking
- Concerns regarding density and height
- Suggested infrastructure improvements such as a medical centre
- Requires open space provision
- Concerns about loss of garages as a vital resource for the community

3.6.4.4 Croxley Green Parish Council objected to site CG65 British Red Cross for the following reasons:

- Objects in strongest possible terms
- It is a community asset at the heart of the community
- TRDC's own Indoor Leisure Needs Assessment states that the projected growth in housing development is likely to lead to the need for additional spaces for indoor activity

3.6.4.5 Watford Rural Parish agreed that **BR20 Northwick Day Centre, CFS12 Kebbell House and H24 The Fairway** are appropriate development sites.

3.6.4.6 Watford Rural Parish objected to sites **AS13 Garages at Blackford Road, AS31 Garages at Woodhall Lane, and PCS16 Vivian Gardens**. Concerns included:

- Loss of parking at garage sites, access issues and impact on highway safety
- Loss of privacy and impact on neighbouring amenity
- Over development and impact on character
- Impact on wildlife and trees

3.6.4.7 Chalfont St Peter Parish Council objected to site **EOS12.4 Land west and south of Maple Cross** citing that the site is not sustainable, access and highway safety concerns and the impact on the Green Belt.

3.6.4.8 Denham Parish Council objected to sites **EOS7.0 Land to the south of Shepherds Lane and east of the M25** and **EOS12.4 Land west and south of Maple Cross** citing traffic and infrastructure concerns.

3.6.5 Hertfordshire County Council Growth and Infrastructure and other County Council departments provided their comments during the Part 4 consultation. A summary can be seen below. With regards to questions 1-4, HCC stated that they are "*concerned that the land for homes allocated in this consultation draft is too low. The local planning authority should satisfy itself that it is planning for the appropriate number of new homes that are needed in its administrative boundary, on the basis of national policy requirements, a robust technical evidence base and best-practice*".

Adult Care Services:

Suggested a general requirement for provision of older persons housing. Adult Care Services (ACS) provided some site specific comments. For medium sized sites, ACS suggested "*that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable*". For larger sites such as **EOS7.0 Land to the south of Shepherds Lane and east of the M25** and **EOS12.4 Land west and south of Maple Cross**, ACS "*recommends the inclusion of one extra-care facility comprising of 70-80 self-contained units*".

Children Services:

Suggested that the larger sites including **EOS7.0 Land to the south of Shepherds Lane and east of the M25** and **EOS12.4 Land west and south of Maple Cross** should provide up to 2FE of new primary phase provision on site.

Public Health:

The County Council would be keen to engage on public health related policies.

Hertfordshire Fire and Rescue Services:

HFRS current capacity is sufficient.

Promote in-built fire suppression systems within new development.

Transport:

Did not object to any of the sites, however, access concerns were raised for some sites including **AB18 Garages Parsonage Close, AB32 Yard off Tibbs Hill Road, NSS66a North Cott East Lane, CFS18c Hill Farm, CFS3 Land adjacent to Fraser Crescent and Woodside Road, CFS6 Land at Mansion House Equestrian Centre, PCS21 Land at Love Lane** with HCC requesting a compliant access strategy to be agree with the highway authority or remedial works to be undertaken.

For site **CFS65 Land North of Bucknalls Lane**, HCC Transport set out the following:

“As stated in the previous representation it is not clear how the proposed site-specific requirement for an access from the A405 can align with plan policy, and would be resisted by the highway authority on a range of policy and technical grounds.

Any policy specifying modal links should be with the agreement of the highway authority.

A plan compliant access strategy for the site should be agreed prior to inclusion in the plan.

The Active and Safer Travel Team suggested that high quality active travel links should be provided to enable access within the recommended accessibility criteria of 400m to the closest bus services currently run along A405”.

For the larger sites including **EOS7.0 Land to the south of Shepherds Lane, east of the M25 EOS12.4 Land west and south of Maple Cross and CFS3 Land adjacent to Fraser Crescent and Woodside Road**, Hertfordshire County Council suggest that a bus strategy for the site will need to be developed and that the quantum of development proposed should enable some degree of service improvement.

Ecology:

Did not identify any “fundamental ecological constraints” within any of the proposed sites. Provided advice where appropriate to specific sites on BNG and ecological enhancements.

Historic Environment:

Did not raise an objection to any of the proposed sites, however, where relevant provided site specific comments advising archaeological assessments or planning conditions.

LLFA:

The LLFA provided site specific comments providing guidance on flood risk and whether flood risk assessments would be necessary and provided guidance on drainage solutions where necessary.

With regards to site **CFS61 Cinnamond House**, the LLFA stated *“we do not think this site is appropriate for development unless it can pass the sequential test and suitable mitigation provided for the substantial surface water flood risk on site. This is likely to require a significant amount of attenuation which may reduce the quantum of housing”*.

Waste and Minerals:

Did not object to any of the sites. Site specific comments including advising Site Waste Management Plans, opportunistic extraction and submission of a mineral resource assessment where appropriate.

3.6.6 Infrastructure providers including the HWE ICB, National Highways and TFL provided comments. A summary of their comments can be seen below:

HWE ICB:

HWE ICB raised the following concerns:

- That the low growth approach may delay the Local Plan and impacts of this on service provision
- Disappointing that identified sites have largely shifted away from the most sustainable locations within the district to small and larger sites in settlements lower down the settlement hierarchy.
- Potential cumulative impacts of small sites with lack of developer contributions

HWE ICB stated that they would apply for developer contributions for a number of medium-scale sites. For larger sites, HWE ICB requested the provision of an on-site medical facility, including **EOS7.0 Land to the south of Shepherds Lane and east of the M25** and **EOS12.4 Land west and south of Maple Cross**.

National Highways:

Remained impartial on the low growth approach.

Set out that they will require an assessment of the cumulative impacts of the non-consented development proposals within the plan and that the level of development would not affect the safe and reliable operation of the strategic road network.

National Highways advised that the larger sites would have to provide a transport assessment and sustainability reviews at a planning application stage.

TfL:

Provided no comments on TRDC's approach or any site-specific comments. Stated that as a landowner for some proposed sites, Places for London will send a separate response representing TfL's interests.

- 3.6.7 Other statutory consultees which provided comments included Historic England, Canal and River Trust, Environment Agency and Natural England. A summary of their comments can be seen below:

Historic England:

Did not object to any of the proposed sites, however, where relevant, provided advice on specific sites including requesting the submission of a Heritage Impact Assessment prior to the Regulation 19 consultation or to include recommendations of Heritage Impact Assessments within policy wording.

Canal and River Trust:

The Canal and River Trust did not object to the principle of any of the proposed sites, however, provided site specific comments where relevant and the need to fully consider potential impacts on the canal corridor (character and water quality etc) and infrastructure.

Environment Agency:

The Environment Agency did not object to the principle of any of the proposed sites, however, did provide site specific comments where necessary, including at sites **ACFS8b Flower House 2-3 Station Road, H22a Depot Stockers Farm Road** and **CFS12 Kebbell House and Land to Rear of Delta Gain**. Their comments provided guidance including the establishment of buffer zones and watercourse improvements.

Natural England:

Provided advice for developments of 100+ dwellings within the Zone of Influence of Chilterns Beechwoods Special Area of Conservation (SAC).

Provided advice that some sites could fall within a possible future boundary variation to the Chilterns AONB. The sites include:

- **AB18 Garage Courts Parsonage Close**
- **NSS2 56 High Street, Bedmond**
- **NSS6a North Cott East Lane**
- **NSS10 Land at Mill Place, Hunton Bridge**
- **CFS59 Land on London Road**

3.7 Landowner/ Promoter Responses

3.7.1 The majority of landowner/promoter responses did not agree with Q1 relating to TRDC not complying with the Standard Method. Similarly, the majority of landowner/promoter responses did not agree with Q3 relating to TRDC's low growth approach. It must be noted that most of the landowner/promoter responses were from representatives of sites which had been rejected from the Local Plan process, particularly due to the Council's Green Belt approach. Most of these responses pushed their own sites for allocation, however, a number of consistent themes were raised which are set out below.

3.7.2 Several consistent themes and arguments were raised within the landowner/promoter responses:

- The Council's approach is not justified, effective or consistent with national policy, including requirement to meet objectively assessed need.
- Having reviewed the scope of the brownfield sites, the Council has enough evidence to support the exceptional circumstances needed to justify changes to the Green Belt boundary in the district.
- The current Green Belt Review is not sufficiently detailed or precise to justify the Council's position. It relies on the assessment of large parcels of land, rather than specific sites. A more fine-grained approach is needed.
- There is a pressing need for housing within the District, particularly affordable housing.
- Concerns raised over social, economic and environmental impacts of lower growth housing figure.
- The benefits of the high growth option are recognised within the Sustainability Appraisal Working Note.
- Shortage of supply in the district has impacted affordability.
- Concerns that the level of shortfall compared to the Standard Method would make the plan unsound.
- The low growth approach would not meet the needs of surrounding authorities and could impact upon duty to co-operate requirements.
- Reference to TRDC's HDT score of 46%.

- Reference to TRDC's 1.9 year Housing Land Supply and history of under delivery of housing.

3.7.3 The following sites received objections from other landowners/promoters.

- **CFS65 Land North of Bucknalls Lane** – Concerns raised due to location near waste facility.
- **CFS16 Land At Chorleywood Station** – Concerns that the site is constrained by the existing railway, the requirement to retain parking provision and protected trees, and concerns were raised over viability and ability to accommodate 190 dwellings.
- **EOS12.4 Land West and South of Maple Cross** - Concerns were raised with regards to flooding, the site being within a source protection zone and concerns about deliverability and build-out rates.
- **EOS7.0 Land to the South of Shepherds Lane and East of the M25** – Concerns about the site being location within source protection zone.
- **CFS40a Land at Park Road** - Concerns about deliverability and viability of the site, TPO's and capacity limits.
- **CFS20 Land at Croxley Station** – Concerns relating to dwelling capacity and that the loss of the timberyard should be considered.
- **CG65 British Red Cross** – Hertfordshire County Council (in a landowner capacity) had concerns regarding impact on access and parking for library.
- **CFS61 Cinnamond House** – Concerns that the site is located within a source protection zone and flooding concerns.

3.8 Public Responses

- 3.9 A large majority of public respondents (including responses received from Have Your Say platform, emails and letters) agree with the Council's proposed stance of not complying with the Government's Standard Method (see Figure 6 below). In total, 789 respondents agreed with this approach whilst 72 did not.

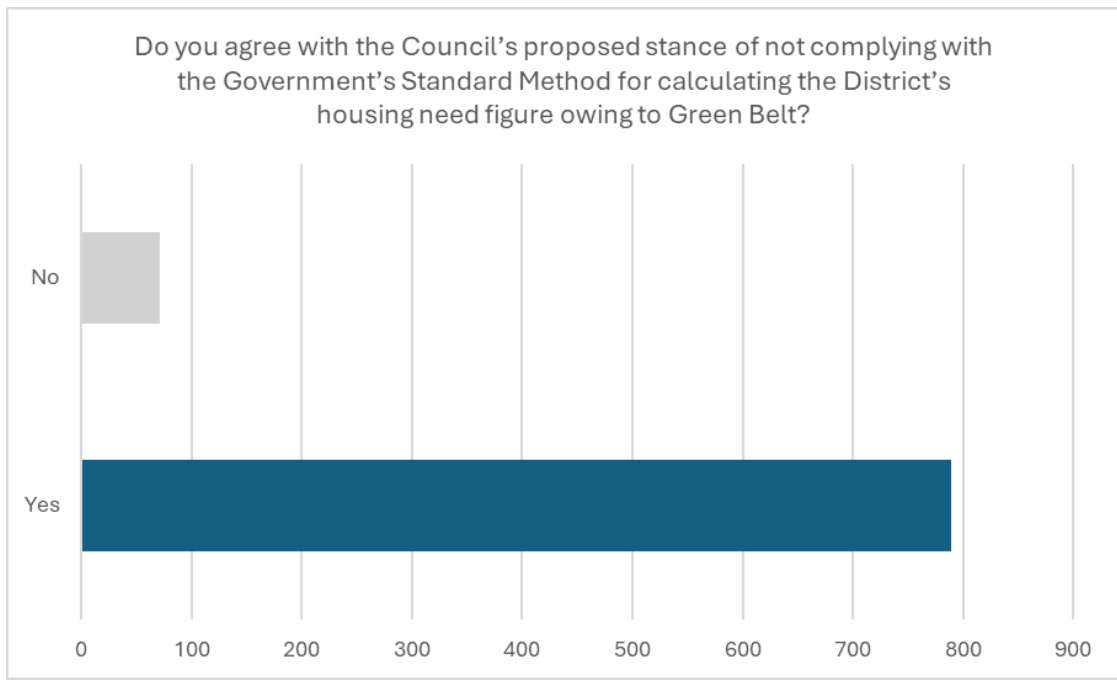


Figure 6. Summary of all public respondent's answers to Question 1

- 3.10 A similarly large majority of public respondents agreed that the Council's preferred 'Low Growth and Green Belt Restraint' option is the best growth strategy for the district (see Figure 7 below) In total, 767 respondents agreed with this approach whilst 82 did not.

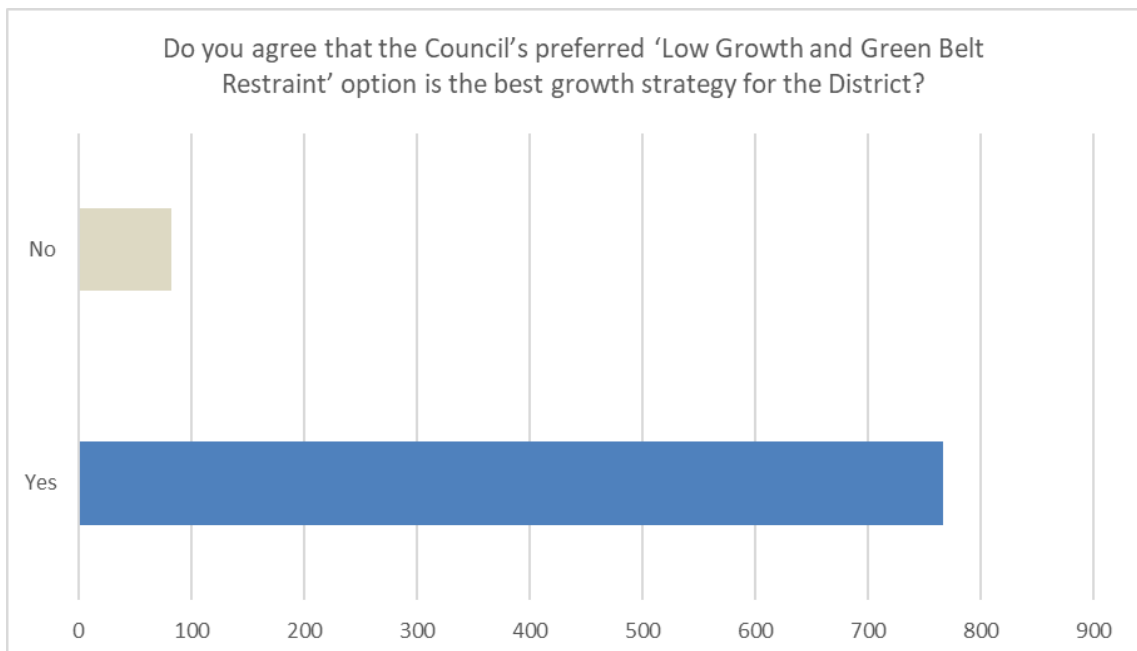


Figure 7. Summary of all public respondent's answers to Question 3.

3.11 Key Themes Within Public Responses:

3.11.1 A number of key themes were identified through the public responses to the consultation, as set out below.

3.11.2 **Green Belt**

The vast majority of public respondents were in favour of protecting the Green Belt to some degree. Whilst many acknowledged that some Green Belt release may be necessary, many respondents were against any form of Green Belt release.

Many indirect impacts of Green Belt release were mentioned including the loss of open space (and how this may impact on mental health), impact on wildlife, impact on character and loss of greenfield land.

3.11.3 **Infrastructure**

Many public respondents expressed concerns more generally about the inadequacy of existing infrastructure and the impact of new development on the existing infrastructure and services including putting a strain on doctors and schools. For the larger sites, some of these comments were more site specific. There were also questions as to whether infrastructure would be delivered as part of new developments.

3.11.4 **Transport**

Many respondents expressed concerns over access, parking and highway issues, traffic pollution and increased congestion arising from new development. Additionally, these comments were attributed to most sites during the site specific comments.

3.11.5 **Affordable Housing**

Many public respondents referenced the need to provide affordable housing and suggested that some of the sites be used for social housing, particularly garage sites.

3.11.6 **Flooding**

The risk of flooding, particularly surface water flooding was raised by many of the public respondents for many of the sites.

3.11.7 **Character**

The potential impact of development on the character of an area and the potential impact of development on heritage assets such as conservation areas and Listed Buildings were raised as concerns by many public respondents. Additionally, for many sites, the indicative dwelling capacity was referred to, often stating that the site was being over developed.

3.11.8 **Impact on Current/Future Occupiers**

The potential impact of development on existing residents was raised by respondents for sites that were located close to existing properties, including loss of light and

privacy concerns. Concerns were also raised for the future occupiers of development within sites located close to infrastructure such as the M25, railway lines or waste facilities, with air, light and noise being regularly referred to.

3.11.9 Evidence Base/ Standard Method

Many public respondents criticised the Standard Method stating that it used out of date population projections. Respondents identified the need for parts of the evidence base following the 2021 census, Brexit, the Covid pandemic and out of date studies such as the Local Housing Needs Assessment and the South-west Hertfordshire Employment Land Study.

- 3.12 The majority of sites received more “yes” responses to whether they are considered an appropriate development site than “no” responses. However, two sites received more “no” responses than “yes”, as seen below:

CG65 British Red Cross:

Public consultees: Yes: 212, No: 223

Main Concerns:

- Loss of a local community centre
- Impact on infrastructure (including schools and health facilities)

EOS7.0 Land to the south of Shepherds Lane and east of the M25:

Public consultees: Yes: 157, No: 163

Main Concerns:

- Road infrastructure, congestion and access from Shepherds Lane
- Loss of Green Belt
- Loss of public open green space
- Impact upon biodiversity and wildlife
- Proximity to the M25 impacting health and noise pollution
- Drainage infrastructure and potential of flooding

- 3.13 Additionally, numerous sites had a large percentage of “no” responses with regards to whether they were an appropriate development site. A summary of these sites can be seen below:

CFS4 Land At Warren Court

Public consultees: Yes: 156, No: 100

Main Concerns:

- School and Health infrastructure
- Road infrastructure and congestion
- Loss of Green belt
- Impact upon biodiversity and wildlife
- Proximity to protected trees

CFS3: Land adjacent to Fraser Crescent and Woodside Road

Public consultees: Yes: 133, No: 121

Main Concerns:

- Proximity to Grade II listed buildings
- Loss of Green Belt
- Impact upon biodiversity and wildlife
- Road infrastructure and congestion
- School infrastructure
- Damage to the rural character of the area

CFS6: Land at Mansion House Equestrian Centre

Public consultees: Yes: 129, No: 118

Main Concerns:

- Impact on wildlife and biodiversity with the area containing category 1 and 2 habitats
- Road infrastructure, access and congestion
- Loss of Green Belt
- Loss of equestrian centre

PCS21: Land at Love Lane

Public consultees: Yes: 132, No: 118

Main Concerns:

- Loss of Green Belt
- Impact upon biodiversity and wildlife
- Road infrastructure, access and congestion

- School and health infrastructure
- Potential loss of a public right of way

CFS65: Land north of Bucknalls Lane

Public consultees: Yes: 157, No: 105

Main Concerns:

- Road infrastructure, congestion and access through Bucknalls Lane
- Loss of Green Belt
- Impact upon biodiversity and wildlife
- Proximity to Recycling Centre
- School infrastructure
- Proximity to the motorway impacting health and noise pollution
- Presence of protected trees

CFS16: Land at Chorleywood Station

Public consultees: Yes: 231, No: 157

Main Concerns:

- Road infrastructure and access through Chorleywood Common
- Loss of parking for the station and the local area
- Rural character of the village
- Impact upon wildlife and biodiversity
- Presence of protected trees
- Impact on sewage infrastructure

CFS18c: Hill Farm, Stag Lane

Public consultees: Yes: 182, No: 157

Main Concerns:

- Road infrastructure, congestion and access from Stag Lane

- Proximity to amenities
- Loss of Green Belt
- Impact upon wildlife and biodiversity
- Potential loss of a Public right of way

EOS12.4: Land west and south of Maple Cross

Public consultees: Yes: 168, No 121

Main Concerns:

- Loss of Green Belt
- Impact upon wildlife and biodiversity
- Loss of public open green space
- School and health infrastructure
- Road infrastructure and congestion
- Proximity to the motorway impacting health and noise pollution

3.14 Appendix 1 – Sites Not Proposed for Development (Q's 5-6)

- 3.14.1 A large majority of public responses were in favour of the sites listed within Appendix 1 (not being proposed for development). Many found this approach to be sensible and proportional with protection of the Green Belt and its uses as the main contributing factor to this view. Other general concerns relating to these sites related to infrastructure, in particular road and school provision. Specific sites that were mentioned in relation to questions 5 and 6 included sites **CFS10**, **CFS56**, **ACFS9e** and **NSS6** in Bedmond and larger sites **CFS26c**, **CFS26e** and **NSS20** in Kings Langley. The main objections to these sites were harm to the Green Belt as well as their respective impact on the character of the local area. A minority of public respondents were not in favour of the sites listed within Appendix 1. The main reason for this concern was the need for housing in the district, particularly affordable housing.
- 3.14.2 Comparatively, a large majority of responses from promoters were not in favour of the sites listed in Appendix 1. Promoters generally specified their own sites in this reasoning. Criticism of the Green Belt review was common with multiple responses noting that harm to the Green Belt was judged with regard to the harm caused by releasing the entire parcel that a site is situated within, rather than assessing harm at a site-specific or more granular level. Other general criticism included the need for housing and services within the district.
- 3.14.3 Statutory consultees were largely in favour of the sites detailed in Appendix 1. Neighbouring authorities and local Parish Councils commented that the removal of these sites helps to prevent neighbouring urban areas from merging into one another

and protecting the Green Belt. Watford Borough Council and Watford Rural Parish Council both commended the removal of sites within Carpenders Park due to their impact on urban sprawl between Watford and Carpenders Park. It was generally noted that Three Rivers District Council provided a clear rationale as to why the excluded sites were not considered.

3.15 Comments on the Sustainability Appraisal Accompanying the Consultation

- 3.15.1 Responses from the public were largely negative with regards to the Sustainability Appraisal. Concerns were raised over the methodology of the appraisal in terms of the impacts on and provision of infrastructure. Many responses did not consider that full extent of impacts on road, water, services and parking had been taken into consideration. Specific sites mentioned in regard to these concerns included **EOS12.4 Land west and south of Maple Cross** and **CFS16 Land at Chorleywood Station**. Within the assessment summary it was noted that all options scored similarly in terms of their environmental impact with questions asked over the validity of this. A specific concern was raised in regard to site **CFS3 Land adjacent to Fraser Crescent and Woodside Road** of which is noted in the appraisal to be served by a regular bus route. Respondents stated that this bus route is no longer in operation. Further concerns were raised as to whether the justification of the lower growth housing option was compelling enough.
- 3.15.2 A small number of public respondents responded positively to the Sustainability Appraisal stating that it is useful, comprehensive and that the consideration of sustainability within any proposal is of great importance.
- 3.15.3 Similarly, responses from promoter consultees were largely negative in regard to the Sustainability Appraisal. General concerns were raised in relation to the vagueness and subjectivity of the appraisal. Many responses stated that it provided an inadequate assessment of the consequences of a lower growth option and its impacts upon health and wellbeing in comparison to higher growth options. Much like the public consultees some responses commented on the similarity in environmental impact for each of the options but questioned the Council's decision in following the lower growth option when housing impact was rated much more favourably in regard to the higher growth options.
- 3.15.4 Statutory consultees provided mixed responses regarding the Sustainability Appraisal. Many, including the Environment Agency, welcomed and were happy with its findings. Some concerns were raised in terms of its comprehensiveness. Watford Borough Council questioned if the appraisal had considered the cumulative impacts of development in the district as a whole. Other responses questioned specific sections of the appraisal with Historic England raising concerns related to the Heritage Assessment for many sites being assessed as '?' and therefore questioned if historic environment considerations had been meaningfully taken into account. Chalfont St Peter Parish Council specified site IOS12.4 as being wrongly assessed as sustainable while it does not have the required facilities nearby. Further concerns were raised in relation to building regulations and energy efficiency which is not detailed within the appraisal.
- 3.15.5 The responses relating specially to the Sustainability Appraisal were sent to TRL Limited, who issued the Sustainability Appraisal, to review further.

4.0 **Potential Updates Following the Part 4 Regulation 18 Consultation**

- 4.1 The planning policy team have collated all of the public, statutory consultee and landowner/promoter responses, with each individual response responded to by policy officers. The policy team will review the public, statutory consultee and landowner/promoter responses and our responses to these and use this information to update wording of policies, SHELAA forms, evidence documents and any other pieces of information relevant to the decision-making process.
- 4.2 Following the part 4 Regulation 18 consultation, the policy team are also in the process of undertaking meetings with promoters of the sites included within the part 4 Regulation 18 consultation document and including reviewing sites removed prior to the part 4 consultation.
- 4.3 A summary of some of the key potential updates following the part 4 Regulation 18 Consultation can be seen below:
- Following the reduction of the scale of site **EOS12.4 Land west and south of Maple Cross**, including a reduction of the indicative dwelling capacity to 850, further dwelling capacity reduction may be required to take into account infrastructure requirements on-site. Additionally, whilst the Transport Team at Hertfordshire County Council have advised that a bus strategy for the site will need to be developed and that the quantum of development proposed should enable some degree of service improvement, the developers have concerns that following the reduction in dwelling capacity, whether bus service improvements are viable.
 - Following discussions with TFL's development company (Places For London), who raised viability concerns about providing like-for-like parking provision at the station sites, policy wording may need to be updated to request that "at a planning application stage a parking survey to establish the future level of parking on site taking into account rail traveller needs whilst opportunities for sustainable transport modes should be maximised and prioritised to allow for alternative forms of transport to the private car shall be submitted" rather than like-for-like parking provision being provided.
 - HCC Transport raised significant concerns with relation to site **CFS65 Land North of Bucknalls Lane** with regards to how the proposed site-specific requirement for an access from the A405 can align with plan policy, and would be resisted by the highway authority on a range of policy and technical grounds. However, it must be noted that since these comments the developer has stated that they have had positive discussions with Herts County Council's transport team with regards to resolving the access concerns.
 - With regards to site **CFS61 Cinnamond House**, the LLFA stated "*we do not think this site is appropriate for development unless it can pass the sequential test and suitable mitigation provided for the substantial surface water flood risk on site. This is likely to require a significant amount of attenuation which may reduce the quantum of housing*". The local authority and developer will have further discussions with the LLFA with regards to their concerns.

4.3 The following sites are no longer available for development (as a site allocation):

- **H18 Royal British Legion** (the site is still operational and the promoter has withdrawn interest)
- **P39 The Queens Drive Garages** (planning application permitted)

4.4 The following sites may now be added to the pool of appropriate development sites:

- **CFS72 Land off Solesbridge Lane**
- **CFS66 Land at London Road**
- **CFS10 Land Between Millhouse Lane and Bell Lane, Bedmond**

4.5 It is important to note that following further discussions with developers, further sites may be added (for example, if previous concerns such as access can be resolved) or removed (for example, due to recent planning consents) from the pool of potential sites and as such the overall housing figures are subject to change.