

SC_P4_00001_National Gas		
General Comments		General Comments – Officer Response
	[Summary of comments. Full PDF available on request] National Gas Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Gas Transmission National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. Utilities Design Guidance The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by National Gas Transmission infrastructure. National Gas Transmission advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around underground gas transmission pipelines and other National Gas Transmission assets. National Gas Transmission is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Gas Transmission assets. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Gas Transmission wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Gas Transmission on any Development Plan Document (DPD) or site-specific proposals that could affect National Gas Transmission's assets.	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as National Gas as part of its Duty to Co-operate.
SC_P4_00002_Historic England		
Q9 & 10 AB26: Do you agree that site AB26 is an appropriate development site? Please explain your answer.		Officer Response AB26
Neutral	[Summary of comments. Full PDF available on request] The site is situated adjacent to the Abbots Langley Conservation Area and Grade II listed 'Breakspear College' (LEN 1296407). Our recommendation: We recommend stipulating in policy that a heritage impact assessment is required before determining any application for the site, as the effects are currently uncertain.	Comments noted. The LPA will discuss Historic England's request for a HIA to be submitted at a planning application stage with the developer.
Q17 & 18 H3: Do you agree that site H3 is an appropriate development site? Please explain your answer.		Officer Response H3
Neutral	[Summary of comments. Full PDF available on request] The site is situated within the Abbots Langley Conservation Area and is adjacent to several listed buildings, including the Grade I listed 'Church of St Lawrence the Martyr' (LEN 1296433), and the Grade II listed 'Abbot's House' (LEN 1296402), '23 (LEN 1100882), High Street' and '25, High Street' (LEN 1100883). While we acknowledge that the site is already allocated in the 2014 adopted Local Plan, it would benefit from a detailed heritage impact assessment to identify any necessary mitigation and enhancement measures. These findings could then be incorporated into the updated policy for the site.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.

	Our recommendation: We recommend conducting a Heritage Impact Assessment (HIA) prior to Regulation 19. This assessment would help identify any essential mitigation and enhancement measures, which can then be incorporated into the policy.	
Q23 & 24 NSS14: Do you agree that site NSS14 is an appropriate development site? Please explain your answer.		Officer Response NSS14
Neutral	[Summary of comments. Full PDF available on request] The site is located within the Abbots Langley Conservation Area, adjacent to several listed buildings, including the Grade I listed 'Church of St Lawrence the Martyr' (LEN 1296433) and Grade II listed 'The War Memorial about 40 metres east-north-east of Church of St Lawrence' (LEN 1173042). Considering the evident sensitivity of the site, it is surprising that it has not been assessed within the Council's High-Level Heritage Impact Assessment. Without this evidence, it is not possible to determine the suitability of the site for allocation and, if deemed suitable, to determine the number of dwellings it could accommodate while appropriately considering and responding to the historic environment. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.
Q27 & 28 CFS3: Do you agree that site CFS3 is an appropriate development site? Please explain your answer.		Officer Response CFS3
Neutral	[Summary of comments. Full PDF available on request] The site is located adjacent to the Grade II listed 'Garston Manor' (LEN 1173003) and 'Ice House about 70 metres northwest of Garston Manor' (LEN 1100917). We support the conclusions of the High-Level Heritage Impact Assessment, which recommends that a heritage impact assessment is necessary to identify the effects on the heritage assets associated with developing this allocation. We believe this assessment should be conducted in advance of Regulation 19 so that it can identify any necessary mitigation and enhancement measures, which might affect the capacity of the site. These findings could then be incorporated into the updated policy for the site. Our recommendation: Effects are uncertain. A Heritage Impact Assessment (HIA) should be conducted before Regulation 19 to confirm the site's suitability for allocation, assess its capacity, and identify any necessary mitigation measures (including appropriate measures on the eastern side of the area, as mentioned in the High Level Heritage Impact Assessment) and enhancement measures to be incorporated into the policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.
Q29 & 30 CFS6: Do you agree that site CFS6 is an appropriate development site? Please explain your answer.		Officer Response CFS6
Neutral	[Summary of comments. Full PDF available on request] The site is located adjacent to the Abbots Langley Conservation Area, and Grade II* 'Tithe Barn about 20 metres north east of Parsonage Farm' (LEN 1100908), and Grade II listed 'Mansion House Farmhouse' (LEN 1348213). We support the conclusions of the High-Level Heritage Impact Assessment, which recommends that a heritage impact assessment is necessary to identify the effects on the heritage assets associated with developing this allocation. We believe this assessment should be conducted in advance of Regulation 19 so that it can identify any necessary mitigation and enhancement measures, which might affect the capacity of the site. These findings could then be incorporated into the updated policy for the site.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer

	Our recommendation: Effects are uncertain. A Heritage Impact Assessment (HIA) should be conducted before Regulation 19 to confirm the site's suitability for allocation, assess its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into the policy.	
Q31 & 32 PCS21: Do you agree that site PCS21 is an appropriate development site? Please explain your answer.		Officer Response PCS21
Neutral	[Summary of comments. Full PDF available on request] In common with CFS6, the site is located adjacent to the Abbots Langley Conservation Area, and Grade II listed 'Mansion House Farmhouse' (LEN 1348213). We support the conclusions of the High-Level Heritage Impact Assessment, which recommends that a heritage impact assessment is necessary to identify the effects on the heritage assets associated with developing this allocation. We believe this assessment should be conducted in advance of Regulation 19 so that it can identify any necessary mitigation and enhancement measures, which might affect the capacity of the site. These findings could then be incorporated into the updated policy for the site. On this point the Council's Sustainability Appraisal concludes uncertain effects. Our recommendation: Effects are uncertain. A Heritage Impact Assessment (HIA) should be conducted before Regulation 19 to confirm the site's suitability for allocation, assess its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into the policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.
Q35 & 36 NSS2: Do you agree that site NSS2 is an appropriate development site? Please explain your answer.		Officer Response NSS2
Neutral	[Summary of comments. Full PDF available on request] The site is located immediately adjacent to the Grade II listed '56, High Street' (LEN 1100886) '52, High Street' (LEN 1348202), and '44, 46 And 48 (Poacher's Cottage), High Street' (LEN 1100885). Unfortunately, we have been unable to locate the assessment for this site within the High-Level Heritage Impact Assessment for Bedmond. Given the potential sensitivity of the site, we recommend undertaking a detailed heritage impact assessment now, ahead of Regulation 19, to confirm the suitability of the site, assess its extent and capacity, and establish any development criteria that may be needed to mitigate potential harm. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.
Q39& 40 NSS10: Do you agree that site NSS10 is an appropriate development site? Please explain your answer.		Officer Response NSS10
Neutral	[Summary of comments. Full PDF available on request] This site is situated to the south of the Hunton Bridge Conservation Area and several listed buildings, including the Grade II* 'The King's Lodge' (LEN 1100913) and the Grade II structures 'K6 telephone kiosk near junction of Bridge Road and Old Mill Road, Hunton Bridge' (LEN 1347866) and 'The King's Head Public House' (LEN 1348217). Unfortunately, we have been unable to locate the assessment for this site within the High-Level Heritage Impact Assessment for Kings Langley. Given the potential sensitivity of the site, we recommend undertaking a heritage impact assessment now, ahead of Regulation 19, to confirm the suitability of the site, assess its extent and capacity, and establish any development criteria that may be needed to mitigate potential harm. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer

	identify any necessary mitigation and enhancement measures to be incorporated into policy.	
Q41 & 42 ACFS8b: Do you agree that site ACFS8b is an appropriate development site? Please explain your answer.		Officer Response ACFS8b
Neutral	[Summary of comments. Full PDF available on request] The site is situated to the east of the 'Little London moated site and surrounding earthwork enclosures, King's Langley' Scheduled Monument (LEN 1010911). According to the Place Services 'High Level Heritage Impact Assessment, February 2022, "Any development of this site will require discussion with Historic England to identify the nature and extent of development that may be possible on the site. A Heritage Impact Assessment will be required." Given the potential sensitivity of the site, we recommend undertaking a detailed heritage impact assessment now, ahead of Regulation 19, to confirm the suitability of the site, assess its extent and capacity, and establish any development criteria that may be needed to mitigate potential harm. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.
Q43 & 44 H7: Do you agree that site H7 is an appropriate development site? Please explain your answer.		Officer Response H7
Neutral	[Summary of comments. Full PDF available on request] The site is situated adjacent to the Grade II listed 'Old Farm Cottages' (LEN 1296346), 'Stables To Langleybury House (Flats 7 To 10 Inclusive)' (LEN 1100889), 'Aisled Barn At Langleybury Home Farm About 45 Metres South West Of Langleybury House' (LEN 1348205), and the Grade II* 'Langleybury House & Film Centre' (LEN 1173157). Considering the evident sensitivity of the site, it is surprising that it has not been assessed within the Council's High-Level Heritage Impact Assessment. While we acknowledge that the site is already allocated in the 2014 adopted Local Plan, it would benefit from a heritage impact assessment to identify any necessary mitigation and enhancement measures. These findings could then be incorporated into the updated policy for the site. Our recommendation: We recommend conducting a Heritage Impact Assessment (HIA) prior to Regulation 19. This assessment would help identify any essential mitigation and enhancement measures, which can then be incorporated into the policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer
Q45 & 46 CFS16: Do you agree that site CFS16 is an appropriate development site? Please explain your answer.		Officer Response CFS16
Neutral	[Summary of comments. Full PDF available on request] The site is located adjacent to the Chorleywood Common Conservation Area, and two Grade II listed buildings: '5,6 and 7, Chorleywood Bottom' (LEN 1100898) and 'K8 kiosk at Chorleywood Station' (LEN 1485091). The Place Services 'High Level Heritage Impact Assessment, February 2022,' concludes that, "Detailed discussion with the Conservation Officer at the pre-application stage to define the level of development that would be acceptable is essential. A heritage impact assessment will be required." The clear inference here is that necessary mitigation measures could affect the number of dwellings that can be accommodated sustainably on the site. On this basis, we strongly recommend that a detailed heritage impact assessment is undertaken now, ahead of Regulation 19, to confirm the site's suitability, assess its extent and capacity, and establish any development criteria that may be needed to mitigate potential harm. As drafted, the proposed dwelling capacity of 190 is not currently justified. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) must be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.

Q51 & 52 ACFS1: Do you agree that site ACFS1 is an appropriate development site? Please explain your answer.		Officer Response ACFS1
Neutral	[Summary of comments. Full PDF available on request] The site is located within the Chorleywood Common Conservation Area, and adjacent to a number of listed buildings, including the Grade II* 'Christchurch', and Grade II 'The Court with east and west lodges', 'K6 telephone kiosk outside Garden Gate public house', and 'Well House at the Manor House'. We support the conclusions of the High-Level Heritage Impact Assessment, which suggests that a detailed heritage impact assessment will be required looking at both the immediate heritage assets but also those further afield such as Applewood Farm. We believe this assessment should be conducted in advance of Regulation 19 so that it can identify any necessary mitigation and enhancement measures (including height of new build), which might affect the capacity of the site. These findings could then be incorporated into the updated policy for the site. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's recommendation for a HIA to be submitted ahead of Regulation 19 stage with the developer.
Q55 & 56 EOS12.4: Do you agree that site EOS12.4 is an appropriate development site? Please explain your answer.		Officer Response EOS12.4
Neutral	[Summary of comments. Full PDF available on request] Site EOS12.4 appears to correspond to High Level Heritage Impact Assessment sites CFS34 (Land South of Hornhill Road and Woodland Road) and CFS34A (Land South of Hornhill Road and Woodland Road, Maple Cross - Larger Site). The site is situated within the broader setting of the Grade II listed 'Church of St Thomas of Canterbury' (LEN 1173848), approximately 500 meters to the southeast. The Council's High-Level Heritage Impact Assessment notes that the Church is a prominent landmark in the area, with its tower visible from a considerable distance. Currently, the church is viewed within an open agrarian landscape, which will be impacted by the change from rural field to urban development. The assessment concludes that careful design has the potential to limit harm, especially on the eastern side of the development. Given the evident sensitivity of the site, we believe that a detailed heritage impact assessment should be conducted before Regulation 19. This assessment can identify any necessary mitigation and enhancement measures. These findings could then be seamlessly incorporated into the updated policy for the site. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's comments, including the request to submit a HIA prior to Regulation 19 Submission.
Q73 & 74 CFS59: Do you agree that site CFS59 is an appropriate development site? Please explain your answer.		Officer Response CFS59
Neutral	[Summary of comments. Full PDF available on request] The site is located adjacent to the Grade II* 'Moor Park' (LEN 1000251) Registered Park and Garden – an 18th-century landscape park and pleasure grounds laid out by Lancelot (Capability) Brown, circa 1753. The 'High-Level Heritage Impact Assessment,' February 2022, notes that the majority of the Registered Park and Garden (RPG), including the western edge closest to the proposed allocation, is used as a golf course. It goes on to state that no harm to these designated heritage assets is anticipated if the building heights/mass of any new development reference the existing character of London Road. We agree and request that these recommendations be incorporated into the site-specific policy for this site.	Comments noted. The LPA will discuss Historic England's comments, including incorporating the 'High-Level Heritage Impact Assessment' recommendations into site-specific policy wording/development criteria.

	Our recommendation: Incorporate the 'High-Level Heritage Impact Assessment' recommendations into site-specific policy wording/development criteria.	
Q75 & 76 CFS40a: Do you agree that site CFS40a is an appropriate development site? Please explain your answer.		Officer Response CFS40a
Neutral	[Summary of comments. Full PDF available on request] The site is located adjacent to the Rickmansworth Town Centre Conservation Area, and a number of listed buildings, including the Grade II listed ' St Joan of Arcs Convent High School' (LEN 1100848) and 'War Memorial Statue' (LEN 1348251) to the south of the railway line, and the Grade II listed 'Roman Catholic Church of Our Lady Help of Christians and St Augustine's Hall' (LEN 1430603). The Council's High-Level Heritage Impact Assessment notes that the Church (LEN 1430603) has direct views of the northern side of railway line and that any development in this area must take into account the setting of the church and its associated views. The assessment concludes that any application must be accompanied by a detailed heritage impact assessment. We agree that a detailed heritage impact assessment is required. However, we believe that it should be undertaken ahead of Regulation 19, so that it can inform necessary mitigation and enhancement measures to be incorporated into policy. Our recommendation: A Heritage Impact Assessment (HIA) should be undertaken ahead of Regulation 19 to confirm the suitability of the site for allocation, inform its capacity, and identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's comments, including the request to submit a HIA prior to Regulation 19 Submission.
Q79 & 80 H18: Do you agree that site H18 is an appropriate development site? Please explain your answer.		Officer Response H18
Neutral	[Summary of comments. Full PDF available on request] The site is located within the Rickmansworth Town Centre Conservation Area. Our recommendation: Our recommendation is to conduct a Heritage Impact Assessment (HIA) to identify and incorporate any necessary mitigation and enhancement measures into the policy if required.	Comments noted. The LPA will discuss Historic England's comments, including the request to submit a HIA prior to Regulation 19 Submission.
Q93 & 94 CFS61: Do you agree that site CFS61 is an appropriate development site? Please explain your answer.		Officer Response CFS61
Neutral	[Summary of comments. Full PDF available on request] The site is located adjacent to two Grade II listed buildings: 'Cassio Bridge Lock number 78' (LEN 1100841) and 'Cassio Bridge Lock House' (LEN 1348238). The Council's High-Level Heritage Impact Assessment concludes that these designated heritage assets will not be affected by the development of CFS61 since views from these assets are blocked by the railway embankment. However, it notes that the impact of development will depend on the proposed construction height. Based on this assessment, we recommend that a detailed heritage impact assessment be conducted now, ahead of Regulation 19 so that it can inform any necessary mitigation and enhancement measures to be incorporated into policy. Our recommendation: Effects uncertain. A Heritage Impact Assessment (HIA) ahead of Regulation 19 would be beneficial to identify any necessary mitigation and enhancement measures to be incorporated into policy.	Comments noted. The LPA will discuss Historic England's comments, including the request to submit a HIA prior to Regulation 19 Submission.
Q107 SA: Do you have any comments on the Sustainability Appraisal working note accompanying this consultation.		Officer Response SA & General Comments
	[Summary of comments. Full PDF available on request] In support of its proposed sites, the Council has published its 'Sustainability Appraisal Working Note' (October 2023) and 'High Level Heritage Impact Assessment' (February 2022), which we welcome. Appendix C of the SA Working Note provides assessments for each of the sites proposed for allocation in the Local Plan Part 4 Regulation 18	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as Historic England and Herts County Council as part of its Duty to Co-operate.

	consultation. These assessments include an objective for the historic environment. However, many of the sites included within the High-Level Heritage Impact Assessment are assessed in the SA as '?' (i.e. uncertain effects) or as 'x' (negative effects) in terms of their impact on the historic environment. This raises uncertainty about how historic environment considerations (i.e. the conclusions of the HIA) have meaningfully influenced the overall site assessment and selection process. Indeed, the prevalence of '?' scores in the SA suggests that the understanding of the impacts on the historic environment for the Council proposed allocated sites may not be sufficient to justify their inclusion and capacity.	
General Comments		
	[Summary of comments. Full PDF available on request] Historic England strongly advises that the local authority conservation teams and archaeological advisors be closely involved throughout the preparation of the assessment of this Plan. They are best placed to advise on local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER - formerly Sites and Monuments Record); how the proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets. Finally, we should like to stress that this response is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise as a result of this plan, where we consider that these would have an adverse effect upon the historic environment. Should you have any questions regarding the comments provided, please feel free to contact me. In the meantime, we look forward to continuing to work with you and your colleagues.	
SC_P4_00003_Transport For London		
Q45 & 46 CFS16: Do you agree that site CFS16 is an appropriate development site? Please explain your answer.		Officer Response CFS16
Neutral	[Summary of comments. Full PDF available on request] Thank you for consulting Transport for London (TfL) on the Regulation 18 Additional Lower Housing Growth Option. We note that CFS16 – Land at Chorleywood station and CFS20 – Land at Croxley station have been allocated as development sites. We do not wish to comment on these site allocations from a transport policy or operational perspective as they are being promoted by Places for London who will send a separate response representing TfL's interests in these sites as a landowner and developer.	Comments noted.
Q83 & 84 CFS20: Do you agree that site CFS20 is an appropriate development site? Please explain your answer.		Officer Response CFS20
Neutral	[Summary of comments. Full PDF available on request] Thank you for consulting Transport for London (TfL) on the Regulation 18 Additional Lower Housing Growth Option. We note that CFS16 – Land at Chorleywood station and CFS20 – Land at Croxley station have been allocated as development sites. We do not wish to comment on these site allocations from a transport policy or operational perspective as they are being promoted by Places for London who will send a separate response representing TfL's interests in these sites as a landowner and developer.	Comments noted.
SC_P4_00005_Affinity Water		
Q15 & 16 AB39: Do you agree that site AB39 is an appropriate development site? Please explain your answer.		Officer Response AB39
Neutral	[Summary of comments. Full PDF available on request]	Comments noted.

	When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	
Q21 & 22 H6: Do you agree that site H6 is an appropriate development site? Please explain your answer.		Officer Response H6
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed. For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites identified for new development with significant critical mains apparatus within their boundaries, where it will be essential that these are taken into consideration in the early stages of new developments.	Comments noted. During Discussions with the developer, the LPA will make the developer aware of Affinity Water's comments and the proximity of the site to Affinity Water apparatus.
Q25 & 26 CFS4: Do you agree that site CFS4 is an appropriate development site? Please explain your answer.		Officer Response CFS4
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q27 & 28 CFS3: Do you agree that site CFS3 is an appropriate development site? Please explain your answer.		Officer Response CFS3
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q29 & 30 CFS6: Do you agree that site CFS6 is an appropriate development site? Please explain your answer.		Officer Response CFS6
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed.	Comments noted. During Discussions with the developer, the LPA will make the developer aware of Affinity Water's comments and the proximity of the site to Affinity Water apparatus.

	For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites which have infrastructure in the vicinity of site boundaries, which development plans will need to take account of [Full comments in PDF] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	
Q31 & 32 PCS21: Do you agree that site PCS21 is an appropriate development site? Please explain your answer.		Officer Response PCS21
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed. For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites identified for new development with significant critical mains apparatus within their boundaries, where it will be essential that these are taken into consideration in the early stages of new developments. [Full comments in PDF] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted. During Discussions with the developer, the LPA will make the developer aware of Affinity Water's comments and the proximity of the site to Affinity Water apparatus.
Q33 & 34 CFS65: Do you agree that site CFS65 is an appropriate development site? Please explain your answer.		Officer Response CFS65
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q35 & 36 NSS2: Do you agree that site NSS2 is an appropriate development site? Please explain your answer.		Officer Response NSS2
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.

Q37 & 38 NSS6a: Do you agree that site NSS6a is an appropriate development site? Please explain your answer.		Officer Response NSS6a
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q39 & 40 NSS10: Do you agree that site NSS10 is an appropriate development site? Please explain your answer.		Officer Response NSS10
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q41 & 42 ACFS8b: Do you agree that site ACFS8b is an appropriate development site? Please explain your answer.		Officer Response ACFS8b
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q49 & 50 CFS18c: Do you agree that site CFS18c is an appropriate development site? Please explain your answer.		Officer Response CFS18c
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed. For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites identified for new development with significant critical mains apparatus within their boundaries, where it will be essential that these are taken into consideration in the early stages of new developments.	Comments noted. During Discussions with the developer, the LPA will make the developer aware of Affinity Water's comments and the proximity of the site to Affinity Water apparatus.
Q55 & 56 EOS12.4: Do you agree that site EOS12.4 is an appropriate development site? Please explain your answer.		Officer Response EOS12.4
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these	Comments noted. The LPA will discuss Affinity Water's comments with the developer.

	individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed. For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites identified for new development with significant critical mains apparatus within their boundaries, where it will be essential that these are taken into consideration in the early stages of new developments. When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	
Q57 & 58 MC11: Do you agree that site MC11 is an appropriate development site? Please explain your answer.		Officer Response MC11
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration. [Full comments in PDF] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q58 & 60 EOS 7.0: Do you agree that site EOS7.0 is an appropriate development site? Please explain your answer.		Officer Response EOS7.0
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed. For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites identified for new development with significant critical mains apparatus within their boundaries, where it will be essential that these are taken into consideration in the early stages of new developments. When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted. The LPA will discuss Affinity Water's comments with the developer.

Q61 & 62 P4a: Do you agree that site P4a is an appropriate development site? Please explain your answer.		Officer Response P4a
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q63 & 64 P33: Do you agree that site P33 is an appropriate development site? Please explain your answer.		Officer Response P33
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q65 & 66 P38: Do you agree that site P38 is an appropriate development site? Please explain your answer.		Officer Response P38
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q67 & 68 P39: Do you agree that site P39 is an appropriate development site? Please explain your answer.		Officer Response P39
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q69 & 70 RW31: Do you agree that site RW31 is an appropriate development site? Please explain your answer.		Officer Response RW31
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q71 & 72 H15: Do you agree that site H16 is an appropriate development site? Please explain your answer.		Officer Response H15
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q73 & 74 CFS59: Do you agree that site CFS59 is an appropriate development site? Please explain your answer.		Officer Response CFS59
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.

Q75& 76 CFS40a: Do you agree that site CFS40a is an appropriate development site? Please explain your answer.		Officer Response CFS40a
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q79 & 80 H18: Do you agree that site H18 is an appropriate development site? Please explain your answer.		Officer Response H18
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q81 & 82 H22a: Do you agree that site H22a is an appropriate development site? Please explain your answer.		Officer Response H22a
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q87 & 88 CG47: Do you agree that site CG47 is an appropriate development site. Please explain your answer.		Officer Response CG47
Neutral	[Summary of comments. Full PDF available on request] We have reviewed the sites for potential allocation and have identified a number of areas where our mains apparatus intersects sites for future development, or redevelopment of existing sites This may affect development potential in some cases, as no development will be permitted within a specified distance of these services. Where there is potential to impact the existing water network, we would expect these impacts to be fully considered and for developers to discuss these with us early in the process. Please note that we have water mains within all town centre boundaries. We will not provide comment on these individually at this stage as they are extensive but would expect developers to engage with us as early as is practicable to ensure that these are taken into consideration as plans are developed. For trunk and raw water trunk mains within or adjacent to sites and their boundaries, there will be no building, planting or other heavy earth works within a minimum of 4 metres of these mains. For our other mains there will be a minimum 2-3 metre no dig exclusion zone unless the mains are to be diverted with the costs for this needing to be met by the developer. Sites identified for new development with significant critical mains apparatus within their boundaries, where it will be essential that these are taken into consideration in the early stages of new developments.	Comments noted. The LPA will discuss Affinity Water's comments with the developer, including potential proximity of the site to apparatus.
Q95 & 96 CFS12: Do you agree that site CFS12 is an appropriate development site. Please explain your answer.		Officer Response CFS12
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments Noted.
Q103 & 104 PCS16: Do you agree that site PCS16 is an appropriate development site. Please explain your answer.		Officer Response PCS16

Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
Q105 & 106 H24: do you agree that site H24 is an appropriate development site. Please explain your answer.		Officer Response H24
Neutral	[Summary of comments. Full PDF available on request] When considering plans for new developments which are within SPZ1s in our area, we would normally ask for conditions to be associated with the applications which minimise risks to public water supply. This could include risks from actions such as construction works causing contamination including turbidity, or changes to surface water infiltration.	Comments noted.
General Comments		Officer Response General Comments
	[Summary of comments. Full PDF available on request] We welcome the opportunity to engage with planning authorities on plan and policy document development. In addition, we welcome the opportunity to engage as early as is practicable with the planning application process.	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as Affinity Water as part of its Duty to Co-operate.
SC_P4_00006_National Grid		
General Comments		Officer Response General Comments
	[Full PDF available on request]	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as National Grid as part of its Duty to Co-operate.
SC_P4_00012_Dacorum Borough Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Neutral	[Summary of comments. Full PDF available on request] Note it is important that any such approach is fully justified in light of the most up to date national policy and guidance. This should include a robust review of how constraints have been taken into account alongside other material considerations.	Comments noted. The standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints, including Green Belt, drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Neutral	[Summary of comments. Full PDF available on request] We note it is important that any such approach is fully justified in light of the most up to date national policy and guidance. This should	Comments noted. The standard method figures should be taken forwards as providing an appropriate

	include a robust review of how constraints have been taken into account alongside other material considerations. Through the Duty to Cooperate, it is important that growth in Kings Langley and the wider area is considered holistically across administrative boundaries and that the necessary infrastructure is planned for appropriately. We welcome continuing the discussions with you on matters of strategic importance such as housing, employment and related topics. I would suggest that we seek to arrange further meetings to discuss cross-boundary issues and progress with our respective plan-making.	assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints, including Green Belt, drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target. Three Rivers will continue undertaking Duty to Cooperate meetings with Dacorum Borough Council and other relevant authorities.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		Officer Response Sites not taken forward
Neutral	[Summary of comments. Full PDF available on request] We broadly welcome the suggested changes to the strategy for growth at Kings Langley. In particular we welcome confirmation that sites CFS26c, NSS20 and CFS26e are recommended to be deleted.	Comments noted.
General Comments		Officer Response General Comments
	[Summary of comments. Full PDF available on request] Through the Duty to Cooperate, it is important that growth in Kings Langley and the wider area is considered holistically across administrative boundaries and that the necessary infrastructure is planned for appropriately. I hope that you find the above response constructive in taking forward your emerging Local Plan. We welcome continuing the discussions with you on matters of strategic importance such as housing, employment and related topics. I would suggest that we seek to arrange further meetings to discuss cross-boundary issues and progress with our respective plan-making.	Comments noted. The LPA will continue to undertake discussions with neighbouring Local Authorities such as Dacorum Borough Council as part of its Duty to Co-operate.
SC_P4_00014_Thames Water		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Neutral	[Full PDF available on request] No relevant comments.	Comments noted.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Neutral	[Summary of comments. Full PDF available on request] Overall the reduced levels of development would have a lesser impact on the sewerage network and capacity at our sewage treatment works although localised network upgrades are likely to be required and will need to be delivered ahead of the occupation of development. We are keen to work closely with the council to understand the level of development that will come forward in the district through the new Local Plan so that this information can be used to inform future growth plans.	Comments noted. The Council will review the site specific comments from Thames Water and liaise with site promoters with regards to Thames Waters' comments or requested actions. The Council will continue to liaise with Thames Water.
Q7 & 8 AB18: Do you agree that site AB18 is an appropriate development site? Please explain your answer.		Officer Response AB18

Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q11 & 12 AB31: Do you agree that site AB31 is an appropriate development site? Please explain your answer.		Officer Response AB31
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q13 & 14 AB32: Do you agree that the site AB32 is an appropriate development site? Please explain your answer.		Officer Response AB32
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q15 & 16 AB39: Do you agree that the site AB39 is an appropriate development site? Please explain your answer.		Officer Response AB39
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q17 & 18: Do you agree that the site H3 is an appropriate development site? Please explain your answer.		Officer Response H3
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q19 & 20: Do you agree that the site H4 is an appropriate development site? Please explain your answer.		Officer Response H4
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q21 & 22: Do you agree that the site H6 is an appropriate development site? Please explain your answer.		Officer Response H6
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q23 & 24: Do you agree that the site NSS14 is an appropriate development site? Please explain your answer.		Officer Response NSS14
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q25 & 26: Do you agree that the site CFS4 is an appropriate development site? Please explain your answer.		Officer Response CFS4
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q27 & 28: Do you agree that the site CFS3 is an appropriate development site? Please explain your answer.		Officer Response CFS3
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q29 & 30: Do you agree that the site CFS6 is an appropriate development site? Please explain your answer.		Officer Response CFS6
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q31 & 32: Do you agree that the site PCS21 is an appropriate development site? Please explain your answer.		Officer Response PCS21
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q33 & 34: Do you agree that the site CFS65 is an appropriate development site? Please explain your answer.		Officer Response CFS65
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed	Comments noted. The LPA will discuss phasing with the applicant and make them aware of

	development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	consultee comments during discussions.
Q35 & 36: Do you agree that the site NSS2 is an appropriate development site? Please explain your answer.		Officer Response NSS2
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q37 & 38: Do you agree that the site NSS6a is an appropriate development site? Please explain your answer.		Officer Response NSS6a
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q39 & 40: Do you agree that the site NSS10 is an appropriate development site? Please explain your answer.		Officer Response NSS10
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q41 & 42: Do you agree that the site ACFS8b is an appropriate development site? Please explain your answer.		Officer Response ACFS8b
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.

Q43 & 44: Do you agree that the site H7 is an appropriate development site? Please explain your answer.		Officer Response H7
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q45 & 46: Do you agree that the site CFS16 is an appropriate development site? Please explain your answer.		Officer Response CFS16
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q47 & 48: Do you agree that the site CW9 is an appropriate development site? Please explain your answer.		Officer Response CW9
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q49 & 50: Do you agree that the site CFS18c is an appropriate development site? Please explain your answer.		Officer Response CFS18c
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q51 & 52: Do you agree that the site ACFS1 is an appropriate development site? Please explain your answer.		Officer Response ACFS1
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q53 & 54: Do you agree that the site NSS23 is an appropriate development site? Please explain your answer.		Officer Response NSS23
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q55 & 56: Do you agree that the site EOS12.4 is an appropriate development site? Please explain your answer.		Officer Response EOS12.4
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q57 & 58: Do you agree that the site NSS23 is an appropriate development site? Please explain your answer.		Officer Response NSS23
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q59 & 60: Do you agree that the site EOS7.0 is an appropriate development site? Please explain your answer.		Officer Response EOS7.0
	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q61 & 62: Do you agree that the site P4a is an appropriate development site? Please explain your answer.		Officer Response P4a
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q63 & 64: Do you agree that the site P33 is an appropriate development site? Please explain your answer.		Officer Response P33
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q65 & 66: Do you agree that the site P38 is an appropriate development site? Please explain your answer.		Officer Response P38
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q67 & 68: Do you agree that the site P39 is an appropriate development site? Please explain your answer.		Officer Response P39

Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q69 & 70: Do you agree that the site RW31 is an appropriate development site? Please explain your answer.		Officer Response RW31
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q71 & 72: Do you agree that the site H15 is an appropriate development site? Please explain your answer.		Officer Response H15
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer	Comments noted.

	network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q73 & 74: Do you agree that the site CFS59 is an appropriate development site? Please explain your answer.		Officer Response CFS59
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q75 & 76: Do you agree that the site CFS40a is an appropriate development site? Please explain your answer.		Officer Response CFS40a
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q77 & 78: Do you agree that the site H17 is an appropriate development site? Please explain your answer.		Officer Response H17
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q79 & 80: Do you agree that the site H18 is an appropriate development site? Please explain your answer.		Officer Response H18
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q81 & 82: Do you agree that the site H22a is an appropriate development site? Please explain your answer.		Officer Response H22a
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q83 & 84: Do you agree that the site CFS20 is an appropriate development site? Please explain your answer.		Officer Response CFS20
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q85 & 86: Do you agree that the site CG16 is an appropriate development site? Please explain your answer.		Officer Response CG16
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. On the information available to date we do not envisage infrastructure concerns regarding wastewater network or wastewater	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	treatment infrastructure capability in relation to this site/s. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q87 & 88: Do you agree that the site CG47 is an appropriate development site? Please explain your answer.		Officer Response CG47
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q89 & 90: Do you agree that the site CG65 is an appropriate development site? Please explain your answer.		Officer Response CG65
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q91 & 92: Do you agree that the site H9 is an appropriate development site? Please explain your answer.		Officer Response H9
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q93 & 94: Do you agree that the site CFS61 is an appropriate development site? Please explain your answer.		Officer Response CFS61
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q95 & 96: Do you agree that the site CFS12 is an appropriate development site? Please explain your answer.		Officer Response CFS12
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
Q97 & 98: Do you agree that the site AS13 is an appropriate development site? Please explain your answer.		Officer Response AS13
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q99 & 100: Do you agree that the site AS31 is an appropriate development site? Please explain your answer.		Officer Response AS31
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.

Q101 & 102: Do you agree that the site BR20 is an appropriate development site? Please explain your answer.		Officer Response BR20
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q103 & 104: Do you agree that the site PCS16 is an appropriate development site? Please explain your answer.		Officer Response PCS16
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	Comments noted. The LPA will discuss Thames Waters comments with the developer.
Q105 & 106: Do you agree that the site H24 is an appropriate development site? Please explain your answer.		Officer Response H24
Neutral	[Summary of comments. Full PDF available on request] Thames Water recognises this catchment is subject to high infiltration flows during certain groundwater conditions. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer networks. Thames Water recognises this catchment is subject to high infiltration flows during certain	Comments noted. The LPA will discuss Thames Waters comments with the developer.

	groundwater conditions. The developer should liaise with the LLFA to agree an appropriate sustainable surface water strategy following the sequential approach before considering connection to the public sewer network. The scale of the proposed development doesn't materially affect the sewer network, however care needs to be taken when designing new networks to ensure they don't surcharge and cause flooding. In the longer term Thames Water, along with other partners, are working on a strategy to reduce groundwater entering the sewer network. 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. It is recommended that the Developer and the Local Planning Authority liaise with Thames Water at the earliest opportunity to advise of the developments phasing. These comments are based on foul flows connecting to the public sewer by gravity (not pumped) and no surface water flows being discharged to the public sewer.	
General Comments		Officer Response General Comments
	[Summary of comments. Full PDF available on request] Overall the reduced levels of development would have a lesser impact on the sewerage network and capacity at our sewage treatment works although localised network upgrades are likely to be required and will need to be delivered ahead of the occupation of development. We are keen to work closely with the council to understand the level of development that will come forward in the district through the new Local Plan so that this information can be used to inform future growth plans.	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as Thames Water as part of its Duty to Co-operate.
SC_P4_00018_HWE Integrated Care Board		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Neutral	[Summary of comments. Full PDF available on request] The Three Rivers Regulation 18 Part 4 consultation proposes a reduced housing target of 4,852 homes, which is a substantially reduced figure from the Government's target of 11,466 new homes. It is noted that the 11,466 target uses the Government's current standard method for calculating local housing need, however the position of Three Rivers District Council is the Government's standard method is too high and based on 2014 household projections. Whilst the Government intends to review the approach for calculating local housing needs, following the release of the next household projections data based on the 2021 Census, the timetable for this is unknown. As a health infrastructure provider, any delay in reaching an adopted Local Plan and/or subsequent changes to the proposed housing targets, will have an impact on the NHS' long term health planning and pipeline projects. In some cases, there may be circumstances where previously identified health infrastructure projects no longer spatially meet the new distribution of housing growth, and/or the quantum of need. Similarly, NHS priorities may have also changed. Given the draft Local Plan is being taken forward 'at risk', the potential uncertainty over whether the draft Local Plan meets the test of legal soundness is of concern to the NHS HWE ICB given the HWE ICB and system partners have assessed long-term health plans in the context of higher growth and now in the context of lower housing targets.	Comments noted. With regards to the use of the standard method figure, it is considered that the standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target. It is acknowledged that uncertainty or delays with the adoption of the Local Plan could cause implications for HWE ICB as the health infrastructure provider.

Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Neutral	[Summary of comments. Full PDF available on request] In relation to the proposed lower growth strategy, and in the light of the NHS' ambition to deliver joined-up care for people who rely on multiple different services, growth located within more accessible locations will offer a number of sustainable modes of travel to access NHS services for patients, visitors and staff alike. It is however 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. The HWE ICB is supportive of a growth strategy which identifies and prioritises development sites on previously developed land first which can provide access to a greater range of services and facilities. Development on brownfield sites, particularly within accessible locations can also bring forward higher densities. These more connected sites, with sustainable active travel choices, are likely to be healthier to live in and can contribute to climate targets. Further, within more connected settlements, there may be opportunities for the NHS to explore repurposing NHS buildings. The majority of brownfield sites identified within the draft Plan are small, with the lowest identified being 6 dwellings. The cumulative impact of these small sites on existing NHS services is of concern to the NHS due to the difficulties for the NHS to mitigate these impacts and successfully secure developer contributions from individual developments. The HWE ICB and system partners therefore seek assurances that the Council will support health developer contributions sought from the NHS to mitigate the health impacts arising from the cumulative impact of small site allocations and would welcome discussions with the Council on the role of CIL in securing necessary funding.	Comments noted. As set out in the Regulation 18 consultation document, the Council "will seek to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land." An Urban Capacity Study has been undertaken to identify available and suitable sites. Additionally, with regards to the Green Belt, our approach is avoid sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review. It is acknowledged that this approach has reduced the number of potential sites compared to previous Regulation 18 Consultations, particularly larger sites, as well as reducing the scale of the retained strategic sites. The LPA will continue to undertake discussions with relevant bodies such as HWE ICB as part of the Duty to Co-operate.
Q27 & 28: Do you agree that the site CFS3 is an appropriate development site? Please explain your answer.		Officer Response CFS3
Neutral	[Summary of comments. Full PDF available on request] This site allocation will have a significant impact on GP practices in Abbots Langley. Vine House Surgery is currently working on a long-term premises plan to enable them to maintain continuity of services for their existing patient population as well as future growth. The HWE ICB will seek a financial contribution as previously explained under the section 'Recent investments and Planned Primary Care Infrastructure'.	Comments noted. During discussions with the developer, the LPA will discuss HWE's comments regarding financial contributions.
Q29 & 30: Do you agree that the site CFS6 is an appropriate development site? Please explain your answer.		Officer Response CFS6
Neutral	[Summary of comments. Full PDF available on request] This site allocation will have a significant impact on GP practices in Abbots Langley. Vine House Surgery is currently working on a long-term premises plan to enable them to maintain continuity of services for their existing patient population as well as future growth. The HWE ICB will seek a financial contribution as previously explained under the section 'Recent investments and Planned Primary Care Infrastructure'.	Comments noted. During discussions with the developer, the LPA will discuss HWE's comments regarding financial contributions.
Q33 & 34: Do you agree that the site CFS65 is an appropriate development site? Please explain your answer.		Officer Response CFS65
Neutral	[Summary of comments. Full PDF available on request] This site allocation is located close to Watford and will mainly impact on GP practices outside the Three Rivers, predominantly in the Garston area. One of the two practices, Garston Medical Centre is operating in very constrained conditions. A project has been approved for the extension and refurbishment of the practice, however, due to the viability issues, this project is currently on hold. The HWE ICB would therefore apply for developer contributions on any new development that would impact on this surgery.	Comments Noted. The LPA will discuss potential financial contributions with the developer.

Q45 & 46: Do you agree that the site CFS16 is an appropriate development site? Please explain your answer.		Officer Response CFS16
Neutral	[Summary of comments. Full PDF available on request] This site allocation will have a significant impact on the GP practices in Chorleywood. Given that one of the surgeries is a branch of the Gade House practice in Rickmansworth which, as explained above, is currently working on their long-term premises plan, the HWE ICB will be seeking a financial contribution towards this project as previously explained under the section 'Recent investments and Planned Primary Care Infrastructure'	Comments noted. During discussions with the developer, the LPA will discuss HWE's comments regarding financial contributions.
Q55 & 56: Do you agree that the site EOS12.4 is an appropriate development site? Please explain your answer.		Officer Response EOS12.4
Neutral	[Summary of comments. Full PDF available on request] An assessment of existing primary care capacity within the PCNs affected, as covered later in this response, shows all PCNs are constrained and their ability to accept new patients is limited, even taking into consideration current GP pipeline projects. This assessment shows there will be a need for new medical facilities which could only be accommodated within sites Maple Cross EOS12.4 and Mill End - EOS7.0. The HWE ICB therefore requests that health infrastructure is provided, in the form of on-site provision for a new medical centre. Without on-site health provision, this major development will have a significant impact on the two GP practices in Rickmansworth. Given that one of the practices, Gade House Surgery is currently working on a long-term premises plan, the HWE ICB would like to reserve an option for an on-site facility for EOS12.4 Maple Cross. This may take a form of a branch surgery or a relocation to provide for their existing patient population as well as future growth.	Comments noted. The LPA will discuss HWE's comments with the developer, including the request for on-site provision of a medical facility to be provided.
Q59 & 60: Do you agree that the site EOS7.0 is an appropriate development site? Please explain your answer.		Officer Response EOS7.0
Neutral	[Summary of comments. Full PDF available on request] An assessment of existing primary care capacity within the PCNs affected, as covered later in this response, shows all PCNs are constrained and their ability to accept new patients is limited, even taking into consideration current GP pipeline projects. This assessment shows there will be a need for new medical facilities which could only be accommodated within sites Maple Cross EOS12.4 and Mill End - EOS7.0. The HWE ICB therefore requests that health infrastructure is provided, in the form of on-site provision for a new medical centre for the following preferred sites:	Comments noted. The LPA will discuss HWE's comments with the developer, including the request for on-site provision of a medical facility to be provided.
Q75 & 76: Do you agree that the site CFS40a is an appropriate development site? Please explain your answer.		Officer Response CFS40a
Neutral	[Summary of comments. Full PDF available on request] This site allocation will have an impact on the GP practices in Rickmansworth. Similar to CFS16 above, the HWE ICB will be seeking a financial contribution towards the Gade House Surgery project.	Comments Noted. The LPA will discuss HWE's comments with the developer regarding financial contributions
Q83 & 84: Do you agree that the site CFS20 is an appropriate development site? Please explain your answer.		Officer Response CFS20
Neutral	[Summary of comments. Full PDF available on request] This major development will have a significant impact on GP practices in Croxley Green, especially the New Road Surgery. As explained above, and dependent on the appeal decision, there is currently a proposal for a new branch surgery in Sarratt, which would alleviate pressures on their main surgery in Croxley Green. Notwithstanding this, there is still a need to relocate the practices' main surgery from a cramped converted residential building to a purpose-built premises. As such the HWE ICB would seek a financial contribution towards a new premises solution for the New Road Surgery.	Comments noted. The LPA will discuss HWE's comments with the developer including the potential need for financial contributions.

Q93 & 94: Do you agree that the site CFS61 is an appropriate development site? Please explain your answer.		Officer Response CFS61
Neutral	[Summary of comments. Full PDF available on request] This site allocation is expected to impact on the Bridgewater House Surgery and the two practices in Croxley Green. For this reason, HWE ICB would be seeking a financial contribution towards a new premises solution for the New Road Practice as previously explained under the section 'Recent investments and Planned Primary Care Infrastructure'.	Comments noted. The LPA will discuss HWE's comments with the developer including the potential need for financial contributions.
General Comments		Officer Response General Comments
	[Summary of comments. Full PDF available on request] Given the role of the Local Plan and its policies to facilitate improvements to health infrastructure and provide a mechanism to improve people's health, the draft Regulation 19 should make reference to this joint, collaborative work and the above-mentioned strategic priorities. The HWE ICB would welcome engagement with the next iteration of the Infrastructure Delivery Plan (IDP), to ensure that the HWE ICB's strategic infrastructure priorities are integrated into the drafting of health infrastructure requirements to support c4,852 new homes. The Local Plan and IDP will need to address the cumulative impact of the smaller developments proposed in the draft Plan, as well as cross-boundary infrastructure and funding sources. It is noted this consultation focusses on housing growth and associated infrastructure and does not include the draft policies of the Plan. The Local Plan Sub-Committee Meetings and Reports referenced in the consultation document have not been reviewed in full against representations made by the NHS at previous Regulation 18 consultation stages. The HWE ICB will await the Regulation 19 consultation and will fully review the draft policies then.	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as Thames Water as part of its Duty to Co-operate. Infrastructure requirements will be identified in the Infrastructure Delivery Plan. It is noted that the HWE ICB will provide policy specific comments as part of the Regulation 19 Consultation.
SC_P4_00019_Watford Borough Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Neutral	[Summary of comments. Full PDF available on request] Watford Borough Council adopted its Local Plan in 2022 with an annual housing requirement of 784 dwellings. It is recognised that Three Rivers is different in character to Watford in terms of the challenges and opportunities facing future development in our respective areas. However, we wish to highlight the importance of demonstrating the exceptional circumstances that are required to justify not achieving a higher level of housing delivery across the plan period. Watford shares its Housing Market Area with Three Rivers, in conjunction with the other South West Hertfordshire authorities of Dacorum, Hertsmere and St Albans. Therefore, the implications the proposed housing figures, as set out in the consultation document, may have for neighbouring districts such as Watford will need to be determined. Watford has a very challenging housing requirement, including a windfall allowance of 148 dwellings per year from 2024/25, compared to the figure of 22 dwellings per year across the plan period as proposed. Watford Borough Council would like to clarify that the borough does not have capacity to meet additional unmet housing need from Three Rivers. During the Examination of the Watford Local Plan, several cross-boundary issues were discussed. These include the provision of education facilities and industrial land, neither of which can be met within Watford's administrative boundaries. The consultation is	Comments noted. It is also considered that the character of Watford Borough Council and Three Rivers District Council are different, including the challenges and opportunities facing future development in our respective areas. It is considered that the standard method figure should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target. As part of ongoing meetings with neighbouring Local Authorities, there will be discussions regarding possible

	focussed on housing sites, however, we would seek reassurance that the revised housing figure and proposed sites do not compromise future discussions and provision of these facilities where opportunities may exist.	implications of the proposed housing figure Comments noted with regards to Watford Borough Council not being able to meet unmet need from Three Rivers District Council The draft local plan is considering the provision of education facilities and industrial land and discussions are ongoing with relevant consultees and stakeholders
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Neutral	[Summary of comments. Full PDF available on request] Watford Borough Council supports the brownfield first approach set out. However, with the scale of growth proposed, consideration should be given to how this may affect growth pressure within existing built up areas where these are considered to be sustainable locations over the plan period. More specifically, how the Sustainability Appraisal has considered if the reduced housing figures would result in greater intensification of built up areas and the implications of this in the context of the cumulative impacts of development and the application of the Local Plan, and the policies within, as a whole.	Comments noted. The Regulation 18 consultation document states that the Council "will seek to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land." An Urban Capacity Study has been undertaken to identify available and suitable sites. With regards to potential intensification of built up areas as a result of the low growth approach, this will be taken into consideration during the Local Plan Process.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		Officer Response Sites not taken forward
Yes	[Summary of comments. Full PDF available on request] Watford Borough Council agrees with the removal of sites CFS13 and CFS14 as development of this land, either individually or collectively, would compromise the separation of Watford (Watford Heath area) and Carpenders Park. This is one of the defined functions of Green Belt defined in the National Planning Policy Framework and concerns have been raised through earlier consultations on the Three Rivers Local Plan.	Comments noted.
Q21 & 22: Do you agree that the site H6 is an appropriate development site?		Officer Response H6
Neutral	[Summary of comments. Full PDF available on request] The site is close to Watford's administrative boundary, however, Watford Borough Council have no concerns to raise in the context of residential development given the location of the site. There is however a significant shortfall of industrial land in Watford with only 25% of its need being met through adopted site allocations. Despite the small size of the site (0.13 hectares), the loss of industrial land will not make a positive contribution to resolving the issue. The Council would welcome opportunities for Three Rivers to support Watford through the protection and allocation of land for industrial use where this would benefit the borough and South West Herts more broadly.	Comments noted. Three Rivers will continue to liaise with neighbouring local authorities such as Watford Borough Council on cross-boundary issues, for example via Duty to Cooperate meetings.
Q25 & 26: Do you agree that the site CFS4 is an appropriate development site?		Officer Response CFS4
Neutral	[Summary of comments. Full PDF available on request] The site is located approximately 300m from Watford administrative boundary. It is not used for allotments at present, however, proposed growth in the area may generate a need for allotments.	Comments noted. Three Rivers will continue to liaise with neighbouring local authorities such as Watford Borough Council on cross-boundary

	Watford borough Council is currently undertaking a needs assessment of allotment provision in the borough. Should there be an identified shortfall in north Watford which would reside within the catchment of the site, we would welcome dialogue about this site and if there is an opportunity the meet shared objectives.	issues, for example via Duty to Cooperate meetings.
Q93 & 94: Do you agree that the site CFS61 is an appropriate development site?		Officer Response CFS61
Neutral	[Summary of comments. Full PDF available on request] The Council would draw attention to the Watford to Croxley Link (W2CL) which is an important transport corridor being progressed between Watford and Ascot Road just south of this site. While this will improve connectivity for residents of the site when delivered, the Council would like Three Rivers to consider if there are implications for site CFS61 and delivery of W2CL. In addition, adopted site allocation MU18 in the Watford Local Plan, located south east of the site, includes development considerations that will safeguard an appropriate amount of land to support a mass rapid transport interchange/station which, once delivered, will improve the sustainability of the location.	Comments noted. With regards to potential further works to the Metropolitan line, representations from TFI and Herts County Council will be taken into consideration.
Q107 SA: Do you have any comments on the Sustainability Appraisal working note accompanying this consultation.		Officer Response SA & General Comments
	[Summary of comments. Full PDF available on request] Watford Borough Council supports the brownfield first approach set out. However, with the scale of growth proposed, consideration should be given to how this may affect growth pressure within existing built up areas where these are considered to be sustainable locations over the plan period. More specifically, how the Sustainability Appraisal has considered if the reduced housing figures would result in greater intensification of built up areas and the implications of this in the context of the cumulative impacts of development and the application of the Local Plan, and the policies within, as a whole.	Comments noted. The LPA will continue to undertake discussions with neighbouring Local Authorities such as Watford Borough Council as part of its Duty to Co-operate.
General Comments		
	[Summary of comments. Full PDF available on request] WBC have been working constructively with TRDC on the development of the Local Plan and will continue to do so. WBC also welcomes continued collaboration between the authorities in South West Hertfordshire on the South West Hertfordshire Joint Strategic Plan which intends to set out a long-term strategy for growth in the sub-region. Should you have any queries regarding these comments please do not hesitate to contact the Watford Borough Council Planning Policy team. This response will not prejudice any future comments the Council may wish to submit at a later date on the Three Rivers Local Plan.	
SC_P4_00020_Chorleywood Parish Council		
Q1 & 2: Do you agree with the Council’s proposed stance of not complying with the Government’s Standard Method for calculating the District’s housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Yes	[Summary of comments. Full PDF available on request] Chorleywood Parish Council supports the level of housing proposed as it balances the need to provide new housing with the requirement to protect Green Belt. We recognise that developing on brownfield sites alone would deliver too few houses (less than 1,000 over the plan period), so that it will be necessary to develop about 50% of new housing on greenfield and, specifically, Green Belt sites. The approach taken in this plan, to allow development on Green Belt sites that result in lower harm to the overall Green Belt whilst only allowing	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on

	development on higher harm Green Belt sites in specific circumstances, delivers the balance that we believe is needed. We acknowledge that the government has defined a Standard Methodology to calculate housing need, but the government accepts that this is based on outdated statistics of expected population / household growth and does not reflect local variations and constraints. As such, it can hardly be described as an “objectively assessed need”. In fact, even the National Planning Policy Framework (NPPF) does not do so but simply describes it as a measure of “local housing need”. So, whilst the Standard Methodology is clearly a starting point, bearing in mind the potential damage to the Green Belt to meet the figure given by this, it is vital to understand the true objectively assessed need using the latest possible data and considering all local factors. To this end, for the Regulation 18 Consultation conducted in 2021, an independent calculation of the objectively assessed need was conducted, using the latest data from the ONS and other sources. This analysis identified a need for between 4,500 and 5,500 new homes over the plan period to cope with projected population growth, to address the shortage of homes for the 20–40 years age group and to provide the resource required for forecast economic growth. The NPPF makes clear in paragraph 11 b) i) that land constraints such as Green Belt should be taken into account in deciding on the number of new homes to include in the Plan. To achieve the level of housing required to meet that given by the Standard Methodology would require approximately 80% of new housing to be built on Green Belt sites, including sites at the highest level of harm to the Green Belt, without any clear benefit to local community as the amount of housing produced would far exceed the objectively assessed housing need. However, limiting new housing to the level proposed by the Council in this Plan, will produce the housing needed in the district whilst restricting the damage done to the Green Belt. As such, the housing level proposed in this plan fairly balances the need to provide new housing with the requirement to protect Green Belt and therefore this plan has our strong support.	Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review. The standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target.
Q3 & 4: Do you agree that the Council’s preferred ‘Low Growth and Green belt Restraint’ option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Yes	[Summary of comments. Full PDF available on request] The Low Growth option proposed is supported by Chorleywood Parish Council as it balances the need to provide new housing with the requirement to protect Green Belt. We recognise that developing on brownfield sites alone would deliver too few houses (less than 1,000 over the plan period), so that it will be necessary to develop about 50% of new housing on greenfield and, specifically, Green Belt sites. The Low Growth – Green Belt Protection Option used in this plan, to allow development on Green Belt sites that result in lower harm to the overall Green Belt whilst only allowing development on higher harm Green Belt sites in specific circumstances, delivers the balance that we believe is needed. The High Growth Option is based upon the government’s Standard Methodology. We acknowledge that the government has defined this methodology as a starting point to calculate housing need, but the government itself accepts that this is based on outdated statistics of expected population / household growth and does not reflect local variations and constraints. As such, it can hardly be described as an “objectively assessed need”. In fact, even the National Planning Policy Framework (NPPF) does not do so but simply describes it as a measure of “local housing need”. So, whilst the Standard Methodology is a starting point, bearing in mind the potential damage to the Green Belt to meet the figure given by this, it is vital to understand the true objectively assessed need using the latest possible data and considering all local factors. To this end, for the Regulation 18 Consultation conducted in 2021, an independent calculation of the objectively assessed need was conducted, using the latest data from the ONS and other sources. This analysis identified a need for between 4,500 and 5,500 new homes over the plan period to cope with projected population growth, to address the shortage of homes for the 20–40 years age group and to provide the resource required for forecast economic growth.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review. The standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target.

	The NPPF makes clear in paragraph 11 b) i) that land constraints such as Green Belt should be taken into account in deciding on the number of new homes to include in the Plan. To achieve the level of housing required to meet that given by the Standard Methodology (i.e. the High Growth Option) would require approximately 80% of new housing to be built on Green Belt sites, including sites at the highest level of harm to the Green Belt, without any clear benefit to local community as the amount of housing produced would far exceed the objectively assessed housing need. However, limiting new housing to the level proposed by the Council in this Plan by adopting the Low Growth - Green Belt Protection approach, will produce the housing needed in the district whilst restricting the damage done to the Green Belt. As such, the Low Growth – Green Belt Protection option proposed in this plan fairly balances the need to provide new housing with the requirement to protect Green Belt and therefore this plan has our strong support.	
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		Officer Response Sites not taken forward
Yes	[Summary of comments. Full PDF available on request] Three Rivers District Council has provided clear rationale as to why the excluded sites are not considered suitable for development which Chorleywood Parish Council supports.	Comments noted.
Q45 & 46 CFS16: Do you agree that the site CFS16 is an appropriate development site?		Officer Response CFS16
Neutral	[Summary of comments. Full PDF available on request] - CPC neither agrees or disagrees that the site is an appropriate development site -Request a Master Plan and site layout plans prior to allocation within the plan -Concerns about impact on character and Conservation Area -Concerns about density -Concerns about potential loss of station car parking -Sewerage capacity concerns -Concerns about impact of railway on new residents -Access, parking and highway safety concerns -Concerns about construction -Concerns regarding loss of public right of way -Concerns about wildlife, protected species and trees -Infrastructure concerns -Request soil analysis	With regards to the request for a Master Plan and site layout plan, the LPA will discuss this further with the applicant. With regards to concerns relating to impact on character and conservation, through Local Plan policy, any development would be required to respond to distinctive local character (including landscape character) and would have to consider a design criteria. Additionally, policies relating to the protection and preservation of heritage assets would be applied at a planning application stage. Dwellings Per Hectare is indicative only and dwelling capacity will be determined at the planning application stage. Policy on internal and external amenity space standards included in the Local Plan. The station use would remain as part of any development and proposals would need to safeguard parking provision for the station. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. With regards to concerns relating to sewerage capacity, the Infrastructure Delivery Plan prepared in consultation with the infrastructure providers will identify any shortfalls and new provision requirements.

		Potential noise, air quality and light issues etc arising from the site's proximity to the railway would need to be addressed as part of any planning application With regards to access and highway safety concerns, representations from the Hertfordshire Highways Authority will be taken into consideration. With regards to construction concerns, it is likely that a construction management plan would be required at a planning application stage. There is a draft policy in the Local Plan requiring a buffer to Public Right of Ways included in Draft Local Plan. PROW will be kept in place. With regards to wildlife and habitat, the legal requirement for a 10% net gain in biodiversity would be applied at the planning application stage. Policies provide for the retention of trees and hedgerows where possible and replanting, as well as other wildlife related policy. Tree related policies would also be applied at an application stage to protect protected trees. Infrastructure requirements will be identified in the Infrastructure Delivery Plan.
Q47 & 48 CFS16: Do you agree that the site CW9 is an appropriate development site?		Officer Response CW9
Neutral	[Summary of comments. Full PDF available on request] As an existing brownfield site, the potential for development is accepted. At the planning application stage it will be necessary to prove that this site will not have an adverse impact due to the loss of parking and is fully compliant with the requirements of the TRDC Local Plan and Chorleywood Neighbourhood Plan.	Comments noted. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety.
Q49 & 50 CFS16: Do you agree that the site CFS18c is an appropriate development site?		Officer Response CFS18c
Yes	[Summary of comments. Full PDF available on request] -Chorleywood Parish Council agree that the site is an appropriate development site, however, raise some concerns -Concerns regarding potential loss of Public Right of Way and request buffer. -Concerns about impacts to wildlife -Concerns regarding highway safety and access -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	Comments noted. There is a draft policy in the Local Plan requiring a buffer to Public Right of Ways included in Draft Local Plan. PROW will be kept in place. With regards to wildlife and habitat, the legal requirement for a 10% net gain in biodiversity would be applied at the planning application stage. Policies provide for the retention of trees and hedgerows where possible and replanting, as well as other wildlife related policy. Tree related policies would also be applied at an application stage to protect protected trees. With regards to access, highway safety and sustainability concerns, representations from the Hertfordshire Highways Authority will be taken into consideration. The green belt boundary may have to be revised. Consideration of retaining

		defensible boundaries will be undertaken. With regards to concerns relating to sewerage capacity, the Infrastructure Delivery Plan prepared in consultation with the infrastructure providers will identify any shortfalls and new provision requirements. Dwellings Per Hectare is indicative only and dwelling capacity will be determined at the planning application stage. Policy on internal and external amenity space standards included in the Local Plan.
Q51 & 52 ACFS1: Do you agree that the site ACFS1 is an appropriate development site?		Officer Response ACFS1
Yes	[Summary of comments. Full PDF available on request] Whilst this site is in Green Belt, it is already developed into a residential dwelling and, therefore, as an existing brownfield site the potential for development is accepted. The sites close proximity to Grade II and II* Listed Buildings and within the Chorleywood Common Conservation Area will mean that any development will have to be designed sensitively to its location. As part of this, any development should set back from both the Chorleywood Road and Christ Church to protect the setting of the listed buildings. It is recommended that parking for the site should be provided under the main building to limit the developed footprint for a Green Belt site. At the planning application stage, it will be necessary to prove that this site is fully compliant with the requirements of the TRDC Local Plan and Chorleywood Neighbourhood Plan.	Comments noted. Through Local Plan policy, any development would be required to respond to distinctive local character (including landscape character) and would have to consider a design criteria. Policies relating to the preservation and protection of heritage assets such as listed buildings and conservation areas would be applied at a planning application stage. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety.
Q53 & 54 NSS23: Do you agree that the site NSS23 is an appropriate development site?		Officer Response NSS23
Yes	[Summary of comments. Full PDF available on request] As an existing brownfield site, the potential for development is accepted. The site is in a highly sustainable site very close to local facilities and public transport. The sites proximity to the Chorleywood Station Conservation Area means that the design of its development will need to be sensitive to its setting. At the planning application stage, it will be necessary to prove that this site is fully compliant with the requirements of the TRDC Local Plan and Chorleywood Neighbourhood Plan.	Comments noted. Through Local Plan policy, any development would be required to respond to distinctive local character and would have to consider a design criteria. Policies relating to the protection and preservation of Heritage Assets would be applied at a planning application stage. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. At the planning application stage any proposal would be assessed against relevant national and local policy.
Q61 & 62 P4a: Do you agree that the site P4a is an appropriate development site?		Officer Response P4a
Yes	[Summary of comments. Full PDF available on request] As an existing brownfield site, the potential for development is accepted. At the planning application stage, it will be necessary to prove that this site will not have an adverse impact due to the loss of	Comments noted. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause

	parking and is fully compliant with the requirements of the TRDC Local Plan and Chorleywood Neighbourhood Plan.	congestion or harm to amenity or highway safety.
Q63 & 64 P33: Do you agree that the site P33 is an appropriate development site?		Officer Response P33
Yes	[Summary of comments. Full PDF available on request] As an existing brownfield site, the potential for development is accepted. At the planning application stage, it will be necessary to prove that this site will not have an adverse impact due to the loss of parking and is fully compliant with the requirements of the TRDC Local Plan and Chorleywood Neighbourhood Plan.	Comments noted. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety.
Q67 & 68 P39: Do you agree that the site P39 is an appropriate development site?		Officer Response P39
Yes	[Summary of comments. Full PDF available on request] As an existing brownfield site, the potential for development is accepted. This site previously had planning permission for the development of temporary housing consisting of 6 flats under planning application 18/0322/FUL. This has now lapsed and a new planning application (23/1619/FUL) for 6 affordable rented flats is under consideration.	Comments noted. Application 23/1619/FUL has been permitted.
SC_P4_00021_Buckinghamshire Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
No	[Summary of comments. Full PDF available on request] There are potential consequential impacts upon adjoining authorities if LPAs do not propose to accommodate the level of housing growth established in the Government's standard methodology. There is no current scope within Buckinghamshire to meet potential unmet needs from the TRDC area. The Local Plan for Buckinghamshire is at an early stage of preparation and there is uncertainty about the level of need which will be planned for and how it will be accommodated.	Comments noted. The standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target.
Q55 & 56 EOS12.4: Do you agree that the site EOS12.4 is an appropriate development site?		Officer Response EOS12.4
No	[Summary of comments. Full PDF available on request] BC needs to be involved in the preparation of the TRDC transport evidence which is required to support the site allocations close to Buckinghamshire in Maple Cross (ref EOS12.4). It is noted that these sites are smaller in scale compared to those proposed in 2021. However, information on potential transport impacts and mitigations does not appear to have been published to inform the consultation. BC does not agree that EOS12.4 is an appropriate development site. These potential impacts of major sites at Maple Cross have been raised previously by BC and it would be helpful to have response from TRDC with an update on the transport modelling evidence.	Comments noted. With regards to concerns relating to congestion, highway safety, access to the site and sustainability, representations from the Hertfordshire Highways Authority and other relevant bodies will be taken into consideration. The LPA will continue to engage and hold discussions with neighbouring authorities, such as Buckinghamshire Council
SC_P4_00022_Environment Agency		

Q5 & Q6 Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		Officer Response Sites not taken forward
Yes	[Summary of comments. Full PDF available on request] We are pleased to see the removal of CFS60 and ACFS13b following our response earlier this year but are disappointed to see that RWA6 has been given planning permission following appeal. We also note that we weren't consulted given its close proximity to Eastbury pumping station and the fact it's located in an Inner Source Protection Zone (SPZ1), in an area where groundwater is likely to be shallow.	Comments noted.
Q41 & 42 ACFS8b: Do you agree that the site ACFS8b is an appropriate development site?		Officer Response ACFS8b
Neutral	[Summary of comments. Full PDF available on request] Development is appropriate if the 8m undeveloped natural buffer zone is provided. Additionally, development should follow a sequential approach placing the most vulnerable development in the lowest risk areas of the site. All development should be outside of FZ3b and all development within the 1 in 100 + Climate Change should be compensated for. Lastly, all development should be safe for its lifetime. The main river Gade is a priority habitat chalk stream. Protected species are also found here. Measures to enhance the watercourse should be sought including removal of hard bed/banks and replaced with soft engineering solution, if necessary; increase sinuosity and morphological diversity; enhance in-channel, marginal aquatic, and bank habitats; establish and manage riparian buffer zones to enhance river corridor. This site is located within a Source protection zone (SPZ) 1. These are designated around potable abstraction and indicative of the location being considered highly sensitive with respect to groundwater. Any proposals should include appropriate risk assessments and remediation measures, if appropriate, and should not negatively impact groundwater quality as required by the NPPF and PPG.	Comments noted. The LPA will discuss the Environment Agency's comments with the developer including: -8m undeveloped natural buffer zone is required -Development should follow a sequential approach -Flood resilience -River Gade is priority habitat chalk stream with protected species -Measures to enhance the watercourse should be sought -The site is located within SPZ 1 - Any proposals should include appropriate risk assessments and remediation measures, if appropriate
Q81 & 82 H22a: Do you agree that the site H22a is an appropriate development site?		Officer Response H22a
Neutral	[Summary of comments. Full PDF available on request] Development should follow a sequential approach placing the most vulnerable development in the lowest risk areas of the site. Additionally, all development within the 1 in 100 + Climate Change should be compensated for. Lastly, all development should be safe for its lifetime. This site is located within a Source protection zone (SPZ) 1. These are designated around potable abstraction and indicative of the location being considered highly sensitive with respect to groundwater. Any proposals should include appropriate risk assessments and should not negatively impact groundwater quality as required by the NPPF and PPG.	Comments noted. The LPA will discuss the Environment Agency's comments with the developer. Additionally, flood related policies would be applied at the planning application stage.
Q95 & 96 CFS12: Do you agree that the site CFS12 is an appropriate development site?		Officer Response CFS12
Neutral	[Summary of comments. Full PDF available on request] Development is appropriate if the 8m buffer zone is provided from the edge of the culvert onsite. Additionally, development should follow a sequential approach placing the most vulnerable development in the lowest risk areas of the site. All development should be outside of FZ3b, and all development within the 1 in 100 + Climate Change should be compensated for. Also, all development should be safe for its lifetime. Furthermore, developers should explore all options of culvert daylighting and re-naturalising of the river channel. This would restore the natural morphology of the river and improve the habitat and biodiversity of the site. This site is located within a Source protection zone (SPZ) 1. These are designated around potable abstraction and indicative of the location	Comments noted. The LPA will discuss the Environment Agency's comments with the developer. Additionally, flood related policies would be applied at a planning application stage.

	being considered highly sensitive with respect to groundwater. Any proposals should include appropriate risk assessments and should not negatively impact groundwater quality as required by the NPPF and PPG.	
Q107 SA: Do you have any comments on the Sustainability Appraisal working note accompanying this consultation.		Officer Response SA & General Comments
	[Summary of comments. Full PDF available on request] With regards to the SA we are happy with the framework used to structure and inform the assessment of the Local Plan. We are also pleased to see that changes have been made to correctly identify sites in Source Protection Zones.	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as The Environment Agency as part of its Duty to Co-operate.
General Comments		
	[Summary of comments. Full PDF available on request] We strongly encourage engagement throughout the Local Plan preparation process and are happy to provide additional evidence and advice and/or meet to discuss any of the comments and recommendations provided in this representation.	
SC_P4_00023_Croxley Green Parish Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Yes	[Summary of comments. Full PDF available on request] The Parish Council considers the housing target as calculated using the Government's standard method to be too high and is based on out of date data (2014 population projections) that do not represent the actual development needs for the area. The Parish Council accepts the need for further housing development to meet the needs of the local community. With a growing population, an ageing population, and future changes in household make-up there is a need for more homes, especially affordable homes, so young people are not forced to move away from the area. This should not be provided at the cost of harming existing communities or causing unacceptable harm to the Green Belt.	Comments noted. The standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Yes	[Summary of comments. Full PDF available on request] Over three quarters (76%) of the District is designated as Green Belt with the remainder of the District made up by the existing urban area consisting of small and medium sized settlements distributed fairly evenly. Three of the five purposes of the Green Belt set out in the National Planning Policy Framework are: (i) to check the unrestricted sprawl of large built-up areas, (ii) to prevent neighbouring towns merging into one another, and (iii) to assist in safeguarding the countryside from encroachment. There is very little undeveloped land within Croxley Green. The remaining areas of Green Belt within the parish, and in adjoining areas, are a vital resource to meet the requirements of the NPPF. Parish Council considers the avoidance of unacceptable harm to the Green Belt to be a key consideration when establishing the level of housing to be delivered through the Local Plan. In addition to protecting the Green Belt, the Parish Council has concerns about the lack of infrastructure to support a substantially increased population locally including, but not limited to, transport, hospitals, schools, water supply and wastewater treatment, and provision for recreation, cultural, and social, activities.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review. With regards to infrastructure, infrastructure requirements will be identified in the Infrastructure Delivery Plan. Additionally, representations from

		relevant bodies such as HWE ICB, Herts County Council (as education authority), Herts Highways and Thames Water will be taken into consideration during the Local Plan process.
Q5 & Q6 Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		Officer Response Sites not taken forward
Yes	[Summary of comments. Full PDF available on request] Agree in general, and specifically in relation to site reference CFS19, Land adjacent 62-84 & 99-121 Sycamore Road, Croxley Green. Site CFS19 is not suitable for any development. It provides an important open space for residents and the local community. It was specifically planned and designed for this purpose in the original 1962 estate and surrounding houses. The site continues to fulfil this function and a number of trees have been afforded protection on the boundary and within the site underlining its importance as open space. Development would be contrary to the adopted Neighbourhood Plan policies. Planning Inspectors have dismissed appeals against the local planning authority's refusal of consent on four separate occasions, in 1969, 1993, 2005 and 2020.	Comments noted.
Q83 & 84 CFS20: Do you agree that the site CFS20 is an appropriate development site?		Officer Response CFS20
Yes	[Summary of comments. Full PDF available on request] -Concerns with regards to parking for residents and commuters -Request a masterplan (in conjunction with CGPC) -Number of dwellings should be reviewed -Concerns about density and height of dwellings -Require new medical centre -Open space should take into account the nearby Barton Way Recreation area and playground.	With regards to parking, the station use would remain as part of any development and proposals would need to safeguard parking provision for the station. Additionally, through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. The site would be required to provide open space and play space. The LPA will discuss the potential for a masterplan with the developer. With regards to density, Dwellings Per Hectare is indicative only and dwelling capacity will be determined at the planning application stage. Policy on internal and external amenity space standards included in the Local Plan. Additionally, through Local Plan policy, any development would be required to respond to distinctive local character (including landscape character) and would have to consider a design criteria. The HWE ICB are responsible for providing GP services and any planned provision will be included in the Infrastructure Delivery Plan. Their comments will also be taken into consideration.
Q85 & 86 CG16: Do you agree that the site CG16 is an appropriate development site?		Officer Response CG16
Yes	[Summary of comments. Full PDF available on request]	Comments noted. Whilst it is noted that the allocation of the site would result in

	The rentable garages in Croxley Green are fully utilised by local residents and businesses and we understand that there is an extensive waiting list. These are a vital resource for our community and should be re-provided on-site as part of the new dwellings or elsewhere within the Parish.	the loss of the garages, as set out in the Council's Local Housing Needs assessment there is a pressing need within the district for housing. The Regulation 18 consultation document states that the Council "will seek to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land". The allocation of garage sites aligns with this approach.
Q87 & 88 CG47: Do you agree that the site CG47 is an appropriate development site?		Officer Response CG47
Yes	[Summary of comments. Full PDF available on request] The rentable garages in Croxley Green are fully utilised by local residents and businesses and we understand that there is an extensive waiting list. These are a vital resource for our community and should be re-provided on-site as part of the new dwellings or elsewhere within the Parish.	Comments noted. Whilst it is noted that the allocation of the site would result in the loss of the garages, as set out in the Council's Local Housing Needs assessment there is a pressing need within the district for housing. The Regulation 18 consultation document states that the Council "will seek to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land". The allocation of garage sites aligns with this approach.
Q89 & 90 CG65: Do you agree that the site CG65 is an appropriate development site?		Officer Response CG65
No	[Summary of comments. Full PDF available on request] Croxley Green Parish Council OBJECTS to this proposal in the strongest possible terms. The Parish Council promoted a petition in 2021 to save the building for the community which was been signed by more than 600 local people. A full statement of the reasons was prepared on our behalf by Jed Griffiths in 2021 and we fully endorse the reasons for our objection set out in the attached statement. This is a community asset at the heart of our community and should not be redeveloped for social housing. It should be improved and used for the community. We endorse and fully support the need for more affordable housing, and more homes for social rent, in Croxley Green. We applaud the district council for increasing the level of such provision in their policies. We note that recent developments in Croxley Green, such as Killingdown Farm, have provided such homes. Prospective developments, such as at Grove Court, and other sites in this consultation, such as the station (CFS20) and Cinnamon House (CFS61) offer opportunities for further provision, which we welcome. 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. This community facility in the heart of our community must remain.	Comments noted. Unless there is no demonstrable need, provision of the community facility would be required on-site.
Q91 & 92 H9: Do you agree that the site H9 is an appropriate development site?		Officer Response H9
Yes	[Summary of comments. Full PDF available on request] This is a small site (0.9 hectare) close to the railway embankment. It is currently allocated for 10 dwellings, which we consider the maximum capacity of the site. Development of this site would also end the	Comments noted. Dwellings Per Hectare is indicative only and dwelling capacity will be determined at the planning application stage. Policy on

	possibility of a Croxley Rail Link / Metropolitan Line Extension which will be needed to cope with the high rise residential housing being constructed on Ascot Road (close by in Watford). Although there may be other proposals to provide high capacity, high speed, transport links between Ascot Road and Watford Town Centre and railway station, we consider they should be linked through Croxley Green to join the metropolitan line and improve accessibility across other parts of Three Rivers.	internal and external amenity space standards included in the Local Plan. With regards to potential further works to the Metropolitan line, representations from TFI and Herts County Council will be taken into consideration.
Q93 & 94 CFS61: Do you agree that the site CFS61 is an appropriate development site?		Officer Response CFS61
Yes	[Summary of comments. Full PDF available on request] Suitable for redevelopment, although the current site provides a visual break between the settlements of Croxley Green and Watford and some of the land is within the Green Belt, separating Croxley Green from Watford. Redevelopment would effectively merge the two settlement areas. Dwelling capacity implies high density housing without proximity to high capacity public transport links or shopping centres. Parking is likely to be a significant local issue. The site is described as being 1 hectare, and suitable for 133 dwellings, way in excess of the proposed maximum housing density of 50 dwellings per hectare. This is simply unacceptable at this location. Development of this site would also end the possibility of a Croxley Rail Link / Metropolitan Line Extension which will be needed to cope with the high rise residential housing being constructed on Ascot Road (close by in Watford). We note that there is a fairly well-equipped playground nearby (across the main road) and that the site is within walking distance of Cassiobury Park. Open space should be provided on the area of land currently within the Green Belt (for the reasons stated in the NPPF).	Comments noted. With regards to green belt, we need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review. 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. Dwellings Per Hectare is indicative only and dwelling capacity will be determined at the planning application stage. Policy on internal and external amenity space standards included in the Local Plan. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. With regards to potential further works to the Metropolitan line, representations from TFI and Herts County Council will be taken into consideration. The site would be required to provide open space and play space.
Q107 SA: Do you have any comments on the Sustainability Appraisal working note accompanying this consultation.		Officer Response SA
	[Summary of comments. Full PDF available on request] YES. Three Rivers District has a considerable quantity of historic housing with comparatively low energy efficiency. Any new housing should be built to the highest possible energy efficiency standards, to help to meet the District's overall carbon reduction requirements. This sustainability appraisal is not concerned with that particular issue (covered in the draft policy documents previously consulted). Any new developments should consider the energy and transport developments likely over at least the next 50 years, as well as the likely climate changes locally.	Comments noted. Any development would be required to meet Local Plan policies which seek to address climate change, e.g. by requiring the maximum reductions in carbon dioxide emissions against Building Regulations requirements allowed by national policy, requiring 10% biodiversity net-gain, reducing water consumption etc. Local Plan policies have informed the TRDC Climate Emergency &

		Sustainability Strategy. Additionally, development would be required to comply with Building Regulations.
SC_P4_00025_St Albans District Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Neutral	[Summary of comments. Full PDF available on request] SADC notes this approach and raises concerns that TRDC does not appear to be meeting the Government's 'Standard Method' for calculating Local Housing Need (637 homes per annum) in full. SADC does not currently consider that it has any capacity to support TRDC in meeting its housing need. As raised previously in DtC discussions, SADC considers that TRDC will need to be able to evidence that it has fully explored all reasonable options for meeting its housing need within the District. This full exploration is in the context of the rest of South West Herts, including St Albans City & District in particular, being fully bounded by the Metropolitan Green Belt.	Comments noted. The standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target. It is acknowledged that SADC may not be able to support TRDC in meeting its housing need.
General Comments		Officer Response General Comments
	[Summary of comments. Full PDF available on request] We look forward to continuing productive Duty to Cooperate (DtC) work between our Local Planning Authorities.	Comments noted. The LPA will continue to undertake discussions with neighbouring Local Authorities such as St Albans District Council as part of its Duty to Co-operate.
SC_P4_00026_HCC Growth & Infrastructure		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Neutral	[Summary of comments. Full PDF available on request] HCC are concerned that the land for homes allocated in this consultation draft is too low.	Comments noted and will be considered in Reg 19 version of the plan.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Housing Option
Neutral	[Summary of comments. Full PDF available on request] 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.	Comments noted.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		Officer Response Sites not taken forward
Yes	[Summary of comments. Full PDF available on request]	Comments noted.

	HCC raised no concerns or objections in relation to any of the sites that the Council are not proposing for development.	
Q7 & 8 AB18: Do you agree that the site AB18 is an appropriate development site?		Officer Response AB18
Neutral	[Summary of comments. Full PDF available on request] We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA. Transport. The accommodation of a suitable access to the site should be determined and agreed with the highway authority. Planning for the right of way should be considered from the earliest stages of design.	Agreed that archaeological interest of the site can be conserved through planning conditions. No action necessary. The risk of flooding from various sources noted. TRDC will liaise with the site promoters for a suitable access to the site should be determined and agreed with the highway authority. Need for planning for the right of way should be considered from the earliest stages of design noted.
Q9 & 10 AB26: Do you agree that the site AB26 is an appropriate development site?		Officer Response AB26
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	Agreed that archaeological interest of the site can be conserved through planning conditions. No action necessary. The risk of flooding from various sources noted. Need for planning for the right of way should be considered from the earliest stages of design noted.
Q11 & 12 AB31: Do you agree that the site AB31 is an appropriate development site?		Officer Response AB31
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	Agreed that archaeological interest of the site can be conserved through planning conditions. No action necessary. The risk of flooding from various sources noted. Need for planning for the right of way should be considered from the earliest stages of design noted.
Q13 & 14 AB32: Do you agree that the site AB32 is an appropriate development site?		Officer Response AB32
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Transport. The accommodation of a suitable access to the site should be determined and agreed upon with the highway authority.	Agreed that archaeological interest of the site can be conserved through planning conditions. No action necessary. TRDC will liaise with the site promoters for a suitable access to the site should be determined and agreed with the highway authority.

Q15 & 16 AB39: Do you agree that the site AB39 is an appropriate development site?		Officer Response AB39
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	[Summary of comments. Full PDF available on request] Agreed that archaeological interest of the site can be conserved through planning conditions. No action necessary. The risk of flooding from various sources noted.
Q17 & 18 H3: Do you agree that the site H3 is an appropriate development site?		Officer Response H3
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Agreed that archaeological interest of the site can be conserved through planning conditions. New text added to with respect to opportunistic mineral extraction and the need for a Site Waste Management Plan (SWMP) to be prepared to support any application.
Q19 & 20 H4: Do you agree that the site H4 is an appropriate development site?		Officer Response H4
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Agreed that archaeological interest of the site can be conserved through planning conditions. New text added to the site specific comments to reflect the proximity to a historic landfill site on the southern and western parameters and the need investigate contamination risk at the application. Further comments added to reflect opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q21 & 22 H6: Do you agree that the site H6 is an appropriate development site?		Officer Response H6
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Agreed that archaeological interest of the site can be conserved through planning conditions. New text added to the site specific comments to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q23 & 24 NSS14: Do you agree that the site NSS14 is an appropriate development site?		Officer Response NSS14
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Agreed that archaeological interest of the site can be conserved through planning conditions. New text added to the site specific comments to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q25 & 26 CFS4: Do you agree that the site CFS4 is an appropriate development site?		Officer Response CFS4

Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. Fundamental Ecological Constraint: No - but undeveloped land (rough vegetation and scattered trees / scrub) so biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	Comments noted. A requirement for an archaeological assessment is already covered in the site-specific comments. No fundamental ecological constraints noted. New text to reflect the need to explore biodiversity offsetting/net gain added. Further text added to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q27 & 28 CFS3: Do you agree that the site CFS3 is an appropriate development site?		Officer Response CFS3
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities	Comments noted. A requirement for an archaeological assessment is already covered in the site-specific comments about a detailed heritage impact assessment. No fundamental ecological constraints noted. New text to reflect the need to explore biodiversity offsetting/net gain added. Further text added to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application. New text added to explore provision for older persons housing or supported housing for people with disabilities. New text added to suggest that as a large greenfield site, below ground SuDS will not be accepted and any water attenuation needs to be delivered above-ground, and for above-ground conveyance (such as through swales, etc). It is noted that the site is accepted for development subject to a suitable Flood Risk Assessment and drainage strategy. New text reflecting the requirement for Integration and permeability for walking and cycling to the High Elms development (and therefore into the existing settlement) added. TRDC will

	has been included at this site. In accordance with Table 1 (see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Icen Projects Older Persons and Adult Disability Care Housing Need Model, the county council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.7 LLFA. This site is at low risk of flooding. As a large greenfield site, below ground SuDS will not be accepted. We would expect all surface water attenuation to be delivered above-ground, and for above-ground conveyance (such as through swales, etc) to be prioritised. 12.8 The LLFA agrees that this site is an appropriate development site, subject to a suitable Flood Risk Assessment and drainage strategy. 12.9 Transport. Integration and permeability for walking and cycling to the High Elms development (and therefore into the existing settlement) will be required. 12.10 Vehicle Access from Fraser Crescent would require more information in terms of suitable access for emergency vehicles (due to the number of dwellings being served from a single access point) and an additional emergency only access point may be required. 12.11 General Vehicle access from High Elms Lane will not be supported. 12.12 Protecting, enhancing and connection to the public footpath will be required. 12.13 It is advised that a plan compliant access strategy for the site should be agreed with the highway authority prior to the site's inclusion in any subsequent consultation Local Plans. 12.14 The Active and Safer Travel Team suggested that planning obligations towards improved bus service provision and infrastructure will be required as this site is currently over the recommended accessibility criteria to bus services. Fundamental Ecological Constraint: No - but undeveloped land (grassland, trees and hedgerows) so biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	liaise with site promoters and HCC to resolve access from Fraser Crescent including identifying an additional emergency only access point. It is noted that General Vehicle access from High Elms Lane will not be supported. Protection, enhancement and connection to the public footpath covered already in the site specific comments. TRDC will liaise with site promoters for a plan-compliant access strategy for the site should be agreed upon with the highway authority prior to the site's inclusion in any subsequent consultation. Planning obligations towards improved bus service provision and infrastructure will be required as this site is currently over the recommended accessibility criteria to bus services noted. No fundamental ecological constraints noted. New text to reflect the need to explore biodiversity offsetting/net gain added. Further text added to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q29 & 30 CFS6: Do you agree that the site CFS6 is an appropriate development site?		Officer Response CFS6
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment	Comments noted. A requirement for an archaeological assessment is already covered in the site-specific comments about a detailed heritage impact assessment. No fundamental ecological constraints noted. New text to reflect the need to explore biodiversity offsetting/net gain added. New text added to explore provision for older persons housing or supported housing for people with disabilities. New text added to suggest that as a large greenfield site, below ground SuDS will not be accepted and any water attenuation needs to be delivered above-ground, and for above-ground conveyance (such as through swales, etc). It is noted that the site is accepted for development subject to a suitable Flood Risk Assessment and drainage strategy. It is noted that Love Lane will not be a

	would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. 12.15 Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities has been included at this site. In accordance with Table 1 (see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Icen Projects Older Persons and Adult Disability Care Housing Need Model, the County Council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.16 LLFA. This site is at low risk of flooding. As a greenfield site, below ground SuDS will not be accepted. We would expect all surface water attenuation to be delivered above-ground, and for above-ground conveyance (such as through swales, etc) to be prioritised. 12.17 We agree that CFS6 is an appropriate development site subject to a suitable Flood Risk Assessment and drainage strategy. 12.18 Transport. Love Lane will not be a suitable access route to service the site, notably for general vehicle movements. An access strategy should be agreed with the highway authority prior to the site(s) inclusion in site's inclusion in any subsequent consultation Local Plans. It is not considered acceptable, nor sound, in this instance to leave access issues to the planning application stage as there cannot be a reasonable assumption made that suitable access is achievable. 12.19 Love Lane has an existing public footpath that must be retained and protected. 12.20 A plan compliant access strategy for the site should be agreed with the highway authority prior to inclusion in the plan. 12.21 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 Bedmond Rd/Tibbs Hill Lane. Fundamental Ecological Constraint: No - but undeveloped land (grassland and hedgerows) so biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	suitable access route to service the site. TRDC will liaise with site promoters for a plan-compliant access strategy for the site should be agreed upon with the highway authority prior to the site's inclusion in any subsequent consultation. Planning obligations towards improved bus service provision and infrastructure will be required as this site is currently over the recommended accessibility criteria to bus services noted. New text added to enable access within the recommended accessibility criteria of 400m to the closest bus services currently run along Bedmond Rd/Tibbs Hill Lane. No fundamental ecological constraints noted. New text to reflect the need to explore biodiversity offsetting/net gain added. Further text added to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q31 & 32 PCS21: Do you agree that the site PCS21 is an appropriate development site?		Officer Response PCS21
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific	provision for older persons housing or supported housing for people with disabilities. New text added to suggest that as a large greenfield site, below ground SuDS will not be accepted and any water attenuation needs to be delivered above-ground, and for above-ground conveyance (such as through swales, etc). It is noted that the site is accepted for development subject to a suitable Flood Risk Assessment and drainage strategy. It is noted that Love Lane will not be a suitable access route to service the site. TRDC will liaise with site promoters for a plan-compliant access strategy for the site should be agreed upon with the highway authority prior to the site's inclusion in any subsequent consultation. Planning obligations

	development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. 12.22 Adult Care Services. The county council notes that no provision for supported housing for people with disabilities has been included at this site. It is suggested that in order to meet the need determined in the Icení Projects Older Persons and Adult Disability Care Housing Need Model, further allocations for supported housing are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.23 Transport. Love Lane will not be a suitable access route to service the site, notably for general vehicle movements. An access strategy should be agreed with the highway authority prior to the site(s) inclusion in any subsequent consultation Local Plans. It is not considered acceptable, nor sound, in this instance to leave access issues to the planning application stage as there cannot be a reasonable assumption made that suitable access is achievable. 12.24 Love Lane has an existing public footpath that must be retained and protected. 12.25 It is advised that a plan compliant access strategy for the site should be agreed with the highway authority prior to inclusion in the plan. 12.26 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 Bedmond Road/Tibbs Hill Lane. Fundamental Ecological Constraint: No - but undeveloped land (grassland and scattered trees / scrub) so biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	towards improved bus service provision and infrastructure will be required as this site is currently over the recommended accessibility criteria to bus services noted. New text added to enable access within the recommended accessibility criteria of 400m to the closest bus services currently run along Bedmond Rd/Tibbs Hill Lane. No fundamental ecological constraints noted. New text to reflect the need to explore biodiversity offsetting/net gain added. Further text added to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q33 & 34 CFS65: Do you agree that the site CFS65 is an appropriate development site?		Officer Response CFS65
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation.	Comments noted. No action necessary as these points have been covered in site-specific information.

	7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. 12.27 Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities has been 23 included at this site. In accordance with Table 1 (see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Icení Projects Older Persons and Adult Disability Care Housing Need Model, the County Council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.28 LLFA. This site is at low risk of flooding. As a greenfield site, below ground SuDS will not be accepted. We would expect all surface water attenuation to be delivered above-ground, and for above-ground conveyance (such as through swales, etc) to be prioritised. 12.29 It is considered that CFS65 is an appropriate development site subject to a suitable Flood Risk Assessment and drainage strategy. 12.30 Transport. 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. 12.31 Any policy specifying modal links should be with the agreement of the highway authority. 12.32 A plan compliant access strategy for the site should be agreed prior to inclusion in the plan. 12.33 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. 12.34 Waste Management. The WDA requires strategically located facilities for the management of Local Authority Collected Waste (LACW). As identified in the WDAs LACW Spatial Strategy (2021)⁹, the effective management of residual waste arising in the county is heavily reliant on the Waterdale Transfer Station which is located within close proximity to the proposed development. 12.35 The Spatial Strategy notes that the Waterdale Transfer Station has significant potential for short, medium and long-term improvements that would substantially improve the resilience of the WDAs residual waste arrangements and its ability to sustainably manage current and future LACW waste. 12.36 The county council have acquired the parcel of land to the south of the existing waste facilities at Waterdale Transfer Station, known as Brookdell Yard. This 9 LACW Spatial Strategy (hertfordshire.gov.uk) 24 area of land will be used to improve operations at the Waterdale Transfer Station and planning permission has been granted for the development of a purpose-built facility for shredding bulky waste such as furniture and mattresses. Planned longer term improvements are for the footprint of the main tipping hall to be increased and the main tipping hall and vehicle apron to be enclosed. Fast acting doors, improved odour suppression and fire prevention systems are proposed and a planning application for these planned improvements will be submitted in due course. 12.37 While the Waterdale Transfer Station is, and will continue to be, operated in line with Environment Agency Permit requirements, the nature of the facility means that odour and noise occur. Complaints in relation to operation of the transfer station have been received from the new Farriers Way development and the WDA is concerned that the introduction of housing within site CFS65, located to the south of the facility will lead to increased complaints.	
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	12.38 The WDA supports the Waste Planning Authority's previous request that the applicant adjusts the proposed buffer distance of 100m to start from the southern most boundary of Brookdell Yard and that appropriate weight should be given to the 'Agent of Change' principle (NPPF, paragraph 187) which states that planning decisions on new developments should ensure integration with existing business such that they do not have unreasonable restrictions placed upon them. This principle should be required for any extension to the existing facility. 12.39 The WDA requests that the TRDC gives proper consideration to the implementation of requirements on developers of this land that will mitigate the risk of the Waterdale Transfer Station adversely impacting on users of the proposed development. Fundamental Ecological Constraint: No - but undeveloped land (rough vegetation and scattered trees / scrub) so biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	
Q35 & 36 NSS2: Do you agree that the site NSS2 is an appropriate development site?		Officer Response NSS2
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Fundamental Ecological Constraint: No – developed site. Avoid illuminating adjacent trees / woodland.	Noted. Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No fundamental ecological constraints noted. No action considered necessary in respect to site details.
Q37 & 38 NSS6a: Do you agree that the site NSS6a is an appropriate development site?		Officer Response NSS6a
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. Transport. It is not considered acceptable nor sound in this instance to leave access issues to the planning application stage as there cannot be a reasonable assumption made that suitable access is achievable. A plan compliant access strategy for the site should be agreed with the highway authority prior to inclusion in the plan. Fundamental Ecological Constraint: No – but partially undeveloped site, partially developed. Southern area is grassland. Biodiversity	Comments noted. Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No fundamental ecological constraints noted. Transport: TRDC will liaise with the developer and HCC to agree a plan compliant access strategy for the Reg 19 version of the Plan. New text is added to site-specific comments to reflect this including the need to explore biodiversity offsetting/net gain. Noted that there are no fundamental ecological constraint.

	offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	
Q39 & 40 NSS6a: Do you agree that the site NSS10 is an appropriate development site?		Officer Response NSS10
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Fundamental Ecological Constraint: No – Brownfield site used for storage. Rough vegetation, scrub and bare ground. Biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	Noted. Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No fundamental ecological constraints noted. Requirement for biodiversity net gain is covered in the Biodiversity, Trees, Woodlands and Landscaping policy in the local plan. No action necessary. No action necessary
Q41 & 42 ACFS8b: Do you agree that the site ACFS8b is an appropriate development site?		Officer Response ACFS8b
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. Fundamental Ecological Constraint: No - but partially undeveloped site (rough vegetation and scattered trees / scrub) so biodiversity offsetting / net gain might be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	Noted. Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No fundamental ecological constraints noted. Requirement for biodiversity net gain is covered in the Biodiversity, Trees, Woodlands and Landscaping policy in the local plan. No action necessary.
Q43 & 44 H7: Do you agree that the site H7 is an appropriate development site?		Officer Response H7
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted.	Noted. Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No fundamental ecological constraints noted. Requirement for biodiversity net gain is covered in the Biodiversity, Trees, Woodlands and Landscaping policy in the local plan. No action necessary.

	7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works.	
Q45 & 46 H7: Do you agree that the site H7 is an appropriate development site?		Officer Response H7
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. 12.44 Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities has been included at this site. In accordance with Table 1(see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Iceni Projects Older Persons and Adult Disability Care Housing Need Model, the County Council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.45 LLFA. There is a high-risk surface water flow path at the north-west of the site, and the LLFA has record of multiple property flooding incidents in the vicinity of the site. 12.46 Parts of the existing car park are modelled to be at medium risk (1:100 year) of flooding from surface water. More of the car park is at risk during 1:1000-year storms. 12.47 It is considered that CFS16 is an appropriate development site subject to a suitable Flood Risk Assessment and drainage strategy, which must consider the issues above. 12.48 Transport. The Active and Safer Travel Team suggested that the central location of the site will enable walking/cycling to the services/facilities in the centre of Chorleywood. Rail services may be more attractive from this site than bus services which are currently limited in frequency. Opportunities to improve sustainable mode access to the station should be explored. Fundamental Ecological Constraint: No –developed site with railway line. Wooded strips so if trees affected then biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024. Southern edge borders Chorleywood Common LWS / LNR so buffer and no adverse effects expected.	Comments noted. Archaeological assessment requirement at the point of application. Additional text inserted in the site-specific comments in the local plan including surface water flooding propensity and need for a FRA and drainage strategy. Additional text inserted ref older persons housing. No fundamental Ecological Constraint noted including any biodiversity net gain/offsetting provision where relevant. New text added to emphasise active travels and sustainable transport.- but undeveloped land (rough vegetation and scattered trees / scrub) so biodiversity offsetting / net gain would be expected.
Q47 & 48 CW9: Do you agree that the site CW9 is an appropriate development site?		Officer Response CW9
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological	Noted. Agree that archaeological interest of these sites can be dealt with through conditions and planning

	conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	application stage. Potential flood risk noted which is captured in the site information. No action necessary.
Q49 & 50 CFS18c: Do you agree that the site CFS18c is an appropriate development site?		Officer Response CFS18c
Neutral	[Summary of comments. Full PDF available on request] Transport. A planned compliant access strategy for the site should be agreed with the highway authority prior to inclusion in the plan. This will need to demonstrate a deliverable solution to the clear constraints the existing highway presents to all users. Fundamental Ecological Constraint: No – Farmhouse and yard / barns with some semi-natural vegetation. Biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024. The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works.	A need for a plan compliant access strategy prior to inclusion in the plan is noted. Liaison with HCC and site promoters to is ongoing to achieve this. No fundamental ecological constraints noted. Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. Requirement for biodiversity net gain is covered in the Biodiversity, Trees, Woodlands and Landscaping policy in the local plan. No action necessary in relation to this.
Q51 & 52 ACFS1: Do you agree that the site ACFS1 is an appropriate development site?		Officer Response ACFS1
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61.	Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this.

	7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. Fundamental Ecological Constraint: No – developed site but has trees and scrub. Biodiversity offsetting / net gain might be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	
Q53 & 54 NSS23: Do you agree that the site NSS23 is an appropriate development site?		Officer Response NSS23
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this.
Q55 & 56 EOS12.4: Do you agree that the site EOS12.4 is an appropriate development site?		Officer Response EOS12.4
Neutral	[Summary of comments. Full PDF available on request] 12.53 Adult Care Services. The county council notes that no provision for older persons housing has been included at this site. In accordance with Table 1 (see general comments section), the County Council recommends the inclusion of one extra-care facility comprising of 70-80 self-contained units. 12.54 LLFA. The site is generally at low risk of flooding, however there are small, localised areas of surface water ponding, which should be mitigated by any proposed drainage designs. 12.55 As a large greenfield site, below ground SuDS will not be accepted. We would expect all surface water attenuation to be delivered above-ground, and for above-ground conveyance (such as through swales, etc) to be prioritised. 12.56 The site is indicated to have low potential for groundwater emergence (less than 25%), however is in close proximity to areas at high risk of groundwater flooding to the east. Ground investigations should be undertaken at the application stage. 12.57 It is considered that EOS12.4 is an appropriate development site subject to a suitable Flood Risk Assessment and drainage strategy, which must consider the issues above including groundwater flood risk. 12.58 Transport. The revised scale raises concerns around the sustainable possibility of the proposal, noting a lack of possible internalisation within the settlement itself. Recent changes to public transport in the area also reduce the sustainable transport opportunities, with limited options to travel other than private car. 12.59 The LPA should be able to demonstrate the sustainability of the allocation given its scale and relationship with the existing settlement. 12.60 The Active and Safer Travel Team suggested that a revised bus strategy for the site will need to be developed. The services in the area have changed recently, but the quantum of development proposed should enable service improvement, subject to further discussions with operators.	Adult care: A need for 70-80 self-contained extra care facility noted. Additional text inserted in the site-specific comments in the local plan including surface water flooding propensity and need for a FRA and drainage strategy. Noted the revised scale of the development may impact the levels of public benefits, including delivering sustainable transport on site. Sustainable travel is covered in part covered by the Sustainable Transport policy in the Local Plan. No action necessary. The request for justifying the sustainability of the allocation given its scale and relationship with the existing settlement. is noted, which will be further confirmed through the local plan viability and Infrastructure Delivery Plan (both ongoing). Also, the request for a revised bus strategy for the site to enable service improvement is noted. Discussion with bus operators and HCC will be undertaken to fulfill this.

Q57 & 58 MC11: Do you agree that the site MC11 is an appropriate development site?		Officer Response MC11
Neutral	[Summary of comments. Full PDF available on request] Archaeology (HCC) - The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. LLFA (HCC) - We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	Noted no fundamental ecological constraints including possible archaeological requirement at planning application stage.
Q59 & 60 EOS 7.0: Do you agree that the site EOS 7.0 is an appropriate development site?		Officer Response EOS 7.0
Neutral	[Summary of comments. Full PDF available on request] Adult Care Services. The county council notes that no provision for older persons housing has been included at this site. In accordance with Table 1 (see general comments section), the county council recommends the inclusion of one extra-care facility comprising of 70-80 self-contained units. LLFA. The site is generally at low flood risk, with a small area at high risk of surface water ponding to the east of the site adjacent to King George V Playing Field. It is considered that this site is an appropriate development site subject to a suitable Flood Risk Assessment and drainage strategy. Transport. The Active and Safer Travel Team suggested that a bus strategy for the site will need to be developed. The quantum of development proposed should enable some degree of service improvement, subject to further discussions with operators. Service improvement may also be affected by delivery of development on EOS12.4 and any developer contributions from there. Children's Services (School Place Planning including SEND). The preferred Local Plan lower growth scenario makes provision for approximately 900 new homes, including existing commitments, across the Rickmansworth (and Mill End) area. Using the tiered strategic planning approach, this equates to planning to be able to accommodate approximately 2FE of demand. At the primary phase, the provision of a new primary school site at EOS7.0 would be supported within this growth scenario, to ensure potential demand arising from new homes can be met locally. The site should be of sufficient size (2.03ha) to be capable of providing up to 2FE of new primary phase provision. At the secondary phase, the retention of the (residual) existing education allocation at Long Lane Mill End for maintained education would help facilitate up to 6FE of new secondary provision to meet potential demand arising from growth across Chorleywood, Maple Cross and Rickmansworth.	Comments Noted. Additional text added to site specific comments in relation to provision for older persons housing. High risk of surface water ponding to the east of the site adjacent to King George V Playing Field noted including the need for an flood risk and drainage assessment. TRDC will liaise with bus operators and HCC regarding bus service improvements and a bus strategy in conjunction with site EOS 12.4. New text for the provision of a 2FE school is added. Potential need for the education provision at the secondary phase noted.
Q61 & 62 P4a: Do you agree that the site P4a is an appropriate development site?		Officer Response P4a
Neutral	[Summary of comments. Full PDF available on request] The site has been identified for post application consultation on archaeology. Brownfield site and no ecological constraints. Site capacity is under 10 units so planning application has been considered minor.	No ecology constraints noted including need for post-application consultation.
Q63 & 64 P33: Do you agree that the site P33 is an appropriate development site?		Officer Response P33
Neutral	[Summary of comments. Full PDF available on request] The site has been identified for post application consultation on archaeology. Brownfield site and no ecological constraints. Site capacity is under 10 units so planning application has been considered minor.	Comments noted.
Q65 & 66 P38: Do you agree that the site P38 is an appropriate development site?		Officer Response P38

Neutral	[Summary of comments. Full PDF available on request] The site has been identified for post application consultation on archaeology. Brownfield site and no ecological constraints. Site capacity is under 10 units so planning application has been considered minor.	Comments noted.
Q67 & 68 P39: Do you agree that the site P39 is an appropriate development site?		Officer Response P39
Neutral	[Summary of comments. Full PDF available on request] The site has been identified for post application consultation on archaeology. Brownfield site and no ecological constraints. Site capacity is under 10 units so planning application has been considered minor.	Comments noted.
Q69 & 70 RW31: Do you agree that the site RW31 is an appropriate development site?		Officer Response RW31
Neutral	[Summary of comments. Full PDF available on request] Large area of gardens with amenity grassland, hedgerows and trees, so biodiversity offsetting / net gain might be expected. The site has been identified for post application consultation on archaeology.	Comments noted.
Q71 & 72 H15: Do you agree that the site H15 is an appropriate development site?		Officer Response H15
Neutral	[Summary of comments. Full PDF available on request] The site has been identified for post application consultation on archaeology.	Comments noted.
Q73 & 74 CFS59: Do you agree that the site H15 is an appropriate development site?		Officer Response CFS59
Neutral	[Summary of comments. Full PDF available on request] Adult Care Services. The county council notes that a 75 bed C2 care home has been included at this site. The county council is supportive of the inclusion of a nursing home at this site and as long as the site meets the locational criteria set out at Table 2 (see general comments section). Fundamental Ecological Constraint: No – but four undeveloped grassland fields with boundary trees so biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	Support noted. New text added in the comment section to reflect HCC views on the need for biodiversity offsetting/net gain.
Q75 & 76 CFS40a: Do you agree that the site CFS40a is an appropriate development site?		Officer Response CFS40a
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works.	Comments noted. Site specific comments capture most of the points made. Requirement to explore the adult care provision has been noted and new text added to site specific comments.

	12.71 Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities has been included at this site. In accordance with Table 1 (see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Icen Projects Older Persons and Adult Disability Care Housing Need Model, the County Council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.72 LLFA. The site is generally at low risk of surface water flooding apart from an area at high risk of surface water ponding on Caravan Lane. There is an ordinary watercourse at the southeast corner of the site. It would be important for any applications to model this watercourse to ensure its floodplain does not impact on the site. 12.73 The site is indicated to have very high potential (>75%) for groundwater emergence. Site-specific ground investigations should be conducted to assess groundwater levels at the earliest stage of any potential development. 12.74 The groundwater flood risk should be investigated at the initial stages of any future development as it may impact on foundation depths, sewers and SuDS features. For avoidance of doubt, areas at groundwater flood risk should be avoided. Any sequential testing should consider groundwater flood risk. Fundamental Ecological Constraint: No – partially developed site with railway line and wooded banks. If trees affected then biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	
Q77 & 78 H17: Do you agree that the site H17 is an appropriate development site?		Officer Response H17
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Comments on exploring archaeological interest at the planning application stage noted.
Q79 & 80 H18: Do you agree that the site H18 is an appropriate development site?		Officer Response H18
Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation.	Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this. Comments on localised flood noted.

	7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor applications and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being a statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	
Q81 & 82 H22a: Do you agree that the site H22a is an appropriate development site?		Officer Response H22a
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Adult Care Services. The county council notes that no provision for supported housing for people with disabilities has been included at this site. The county council suggests that, in order to meet the need determined in the Icenis Projects Older Persons and Adult Disability Care Housing Need Model, further allocations for supported housing are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). Fundamental Ecological Constraint: No – previously developed land. We are pleased to see that part of Stockers Farm Meadow Local Wildlife Site (LWS) has now been removed from this boundary. Any development should have a buffer to the north and west against the adjacent LWS, to avoid any adverse impact.	Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this. New text added to site specific comments to explore adult care provision. New text regarding the need for a buffer to the north and west added to site specific comments.
Q83 & 84 CFS20: Do you agree that the site CFS20 is an appropriate development site?		Officer Response CFS20
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. 12.80 Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities has been included at this site. In accordance with Table 1 (see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Icenis Projects Older Persons and Adult Disability Care Housing Need Model, the County Council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.81 LLFA. The site is generally at low risk of surface water flooding apart from an area at high risk of surface water ponding on at the north of the site adjacent to Watford Road. 12.82 The site is indicated to have high potential (>50%) for groundwater emergence. Site-specific ground investigations should be conducted to assess groundwater levels at the earliest stage of any potential development. 12.83 The site is likely to be appropriate for development with respect to flood risk however groundwater flood risk should be investigated at the initial stages of any future development as it may impact on foundation depths, sewers and SuDS features. The site is also in	New text added to explore provision for older persons housing or supported housing for people with disabilities to the site specific comments including the need for site-specific ground investigations should be conducted to assess groundwater levels at the earliest stage of any potential development. No ecological constraints noted. New text added to explore biodiversity offsetting/net gain.

	groundwater Source Protection Zone 1; therefore groundwater contamination must be strictly avoided. Fundamental Ecological Constraint: No –developed site with railway line. Wooded strip so if trees affected then biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	
Q85 & 86 CG16: Do you agree that the site CG16 is an appropriate development site?		Officer Response CG16
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this. Possible flood issues noted. No action necessary.
Q87 & 88 CG47: Do you agree that the site CG47 is an appropriate development site?		Officer Response CG47
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this. Possible flood issues noted. No action necessary.
Q89 & 90 CG65: Do you agree that the site CG65 is an appropriate development site?		Officer Response CG65
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this. Possible flood issues noted. No action necessary.
Q91 & 92 H9: Do you agree that the site H9 is an appropriate development site?		Officer Response H9
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Fundamental Ecological Constraint: No – developed site. Bordered by broadleaved woodland to the west so buffer may be advisable.	Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. No action necessary in relation to this. Possible flood issues noted. No fundamental ecological constraints noted. No action necessary.
Q93 & 94 CFS61: Do you agree that the site CFS61 is an appropriate development site?		Officer Response CFS61

Neutral	[Summary of comments. Full PDF available on request] The following sites below include, or have the potential to include, heritage assets with archaeological interest. However, Historic Environment do not believe that there is a high risk that the archaeology interest will be a constraint on the principle of development of the proposed scale. Although in some instances the archaeological interest could have an influence on the precise numbers of dwellings or the design of development proposals, should they be adopted. 7.2 The sites identified are as follow - CFS3, CFS4, CFS6, PCS21, CFS65, NSS6a, ACFS8b, H7, ACFS1, CFS18c, EOS12.4, EOS7.0, CFS40a, H18, CFS61. 7.3 For those sites listed, we would therefore recommend that, in accordance with Government NPPF policies, for example Policy 16 (para. 205, etc.) and relevant guidance contained in the National Planning Practice Guidance, and in the Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England, 2015) that pre-application or pre-determination archaeological assessments should be included within all development briefs and other specific development proposals for the sites, if they are formally adopted as development sites in the local development plan. Such assessment would, depending upon the size and location of the proposals, range in scope from additional desk-based research to more extensive archaeological field survey and evaluation. 7.4 The county council's Historic Environment advisory team would be happy to advise further with regard to the scope of any such archaeological works. Adult Care Services. The county council notes that no provision for older persons housing or supported housing for people with disabilities has been included at this site. In accordance with Table 1 (see general comments section), this site isn't large enough for the inclusion of housing for older people, however, as the recommendations for inclusion based on size alone does not fully meet the need determined in the Icen Projects Older Persons and Adult Disability Care Housing Need Model, the County Council suggests that further allocations for specialist housing (including supported housing) are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). 12.85 LLFA. A significant area of the site is at high risk of flooding from surface water from an off-site flow path to the west. The LPA may wish to ensure this site passes as sequential test. 12.86 The site is indicated to have high potential (>50%) for groundwater emergence. Site-specific ground investigations should be conducted to assess groundwater levels at the earliest stage of any potential development. 12.87 Based on the above, 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. Fundamental Ecological Constraint: No – developed site, half paved with x1 building, half amenity grass and boundary trees. Biodiversity offsetting / net gain might be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	Agree that archaeological interest of these sites can be dealt with through conditions and planning application stage. Possible flood issues noted. No fundamental ecological constraints noted. New text added to explore provision for older persons housing or supported housing for people with disabilities to the site specific comments. The site will be subject to sequential testing for flood impact.
Q95 & 96 CFS12: Do you agree that the site CFS12 is an appropriate development site?		Officer Response CFS12
Neutral	[Summary of comments. Full PDF available on request] The site has been identified for post application consultation on archaeology. The county council notes that no provision for supported housing for people with disabilities has been included at this site.	Comments noted and new text added to the site specific coments in relation to the provision for older persons housing.
Q97 & 98 AS13: Do you agree that the site AS13 is an appropriate development site?		Officer Response AS13

Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Adult Care Services. The county council notes that no provision for supported housing for people with disabilities has been included at this site. It is suggested that, in order to meet the need determined in the Icení Projects Older Persons and Adult Disability Care Housing Need Model, further allocations for supported housing are delivered at smaller sites or where developers are amenable, as long as they conform to the locational criteria given at Table 2 (see general comments section). Fuindamental Ecological Constraint: No - partially developed site with are of rough vegetation / scrub; if affected then biodiversity offsetting / net gain would be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024.	Comments noted. Archaeological assessment requirement at the point of application. Additional text inserted ref older persons housing. No fundamental Ecological Constraint noted. Additional text re biodiversity net gain/offsetting provision added.
Q99 & 100 AS31: Do you agree that the site AS31 is an appropriate development site?		Officer Response AS31
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA.	Comments noted. Archaeological assessment requirement at the point of application.
Q101 & 102 BR20: Do you agree that the site BR20 is an appropriate development site?		Officer Response BR20
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. Adult Care Services. The county council notes the comments included in the consultation document for this site 'Northwick Road Day Centre facility would need to be re-provided in the local area as part of any development'. It is the county council's intention to re-provide this existing day service at the southern parcel of the Sir James Altham site, site reference CFS52.	Comments noted. Archaeological assessment requirement at the point of application. Amendements made in relation to the provision of Northwick Road Day Centre at the southern parcel of the site CFS52.
Q103 & 104 PCS16: Do you agree that the site PCS16 is an appropriate development site?		Officer Response PCS16
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved. We note that several of the proposed sites (AB18, AB26, AB31, AB39, CW9, MC11, P4A, P33, P38, P39, H18, CG16, CG65, AS13, AS31 and PCS16, which total 102 units) all have a respective dwelling capacity of fewer than 10 units. Planning applications made on these sites would therefore likely be considered as minor application and the LLFA would not be a statutory consultee on these developments. The LPA should be aware that despite the LLFA not being statutory	Comments noted. Archaeological assessment requirement at the point of application. Additional text inserted ref older persons housing. No fundamental Ecological Constraint noted. New text added re any biodiversity net gain/offsetting provision.

	consultee on minor cases, several of them are at risk of flooding from various sources which must be considered in the design. If in doubt, please consult the LLFA. Fundamental Ecological Constraint: No – developed site. However large gardens with amenity grassland and mature trees so biodiversity offsetting / net gain might be expected. Biodiversity Net Gain to become mandatory for the majority of development sites (unless exempt) from January 2024	
Q105 & 106 H24: Do you agree that the site H24 is an appropriate development site?		Officer Response H24
Neutral	[Summary of comments. Full PDF available on request] The archaeological interest of these sites can be conserved by appropriate planning requirements (for example archaeological conditions) imposed by the LPA, should planning permission be approved.	Comments noted. Archaeological assessment requirement at the point of application.
SC_P4_00026_HCC Minerals & Waste		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Lower Housing
Neutral	[Summary of comments. Full PDF available on request] The Minerals and Waste Planning Authority (MWPA) has no comments to make on the Council's proposal to not comply with the Government's Standard Method for calculating the District's housing need figure. In the context of responding to Local Plan consultations, the Minerals and Waste Planning Authority's (MWPA) interests relate to the safeguarding of minerals and waste infrastructure, the safeguarding of mineral deposits and the management of waste arising, particularly those arisings coming from the demolition and construction of built development.	Comments noted.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Neutral	[Summary of comments. Full PDF available on request] In the context of responding to Local Plan consultations, the Minerals and Waste Planning Authority's (MWPA) interests relate to the safeguarding of minerals and waste infrastructure, the safeguarding of mineral deposits and the management of waste arising, particularly those arisings coming from the demolition and construction of built development.	Comments noted.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		Officer Response Sites not taken forward
Yes	[Summary of comments. Full PDF available on request] The MWPA raises no concerns or objections in relation to any of the sites that the Council are not proposing for development.	Comments noted.
Q7 & 8 AB18: Do you agree that the site AB18 is an appropriate development site?		Officer Response AB18
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Minerals/Waste: Comments noted.
Q9 & 10 AB26: Do you agree that the site AB26 is an appropriate development site?		Officer Response AB26
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral	Comments noted.

	sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	
Q11 & 12 AB31: Do you agree that the site AB31 is an appropriate development site?		Officer Response AB31
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q13 & 14 AB32: Do you agree that the site AB32 is an appropriate development site?		Officer Response AB32
Yes	[Summary of comments. Full PDF available on request] The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planing application stage.
Q17 & 18 H3: Do you agree that the site H3 is an appropriate development site?		Officer Response H3
Yes	[Summary of comments. Full PDF available on request] The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	H6: Agreed that archaeological interest of the site can be conserved through planning conditions. New text added to the site specific comments to encourage opportunistic extraction and the need for a Site Waste Management Plan (SWMP) prepared to support any application.
Q19 & 20 H4: Do you agree that the site H4 is an appropriate development site?		Officer Response H4
Yes	[Summary of comments. Full PDF available on request] In response to question 19, our records show that the southern and western parameters of site H4 adjoin a Historic Landfill site (reference: EAHL32349). The presence of and risk from contaminative materials should be a consideration in any proposal at this site. The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits	Comments noted. The LPA will discuss these comments with the developer including, the consideration of contaminative materials, opportunistic extraction during construction and the need for a SWMP at planing application stage.

	beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	
Q21 & 22 H6: Do you agree that the site H6 is an appropriate development site?		Officer Response H6
Yes	[Summary of comments. Full PDF available on request] The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planing application stage
Q23 & 24 NSS14: Do you agree that the site NSS14 is an appropriate development site?		Officer Response NSS14
Yes	[Summary of comments. Full PDF available on request] The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planing application stage
Q25 & 26 CFS4: Do you agree that the site CFS4 is an appropriate development site?		Officer Response CFS4

Neutral	[Summary of comments. Full PDF available on request] The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. British Geological Survey (BGS) data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planning application stage
Q27 & 28 CFS3: Do you agree that the site CFS3 is an appropriate development site?		Officer Response CFS3
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site, but careful consideration must be given to the mineral matters set out below. Should the District Council be minded to continue to include this allocation, the need to assess the potential suitability of mineral extraction and how this requirement will fit in with the site's delivery and it's supporting text (or policy text where appropriate) will need to be considered. Site CFS3 is 7.1 hectares and has the potential to accommodate up to 303 dwellings. Site CFS3 is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. BGS data also identifies potential superficial sand/gravel deposits beneath the site. Adopted Minerals Local Plan Policy 5: Mineral Sterilisation states: Mineral extraction will be encouraged prior to other development taking place where any significant mineral resource would otherwise be sterilised, or where despoiled land would be improved following restoration. The County Council will object to any development proposals within, or adjacent to areas of potential mineral resource, which would prevent, or prejudice potential future mineral extraction unless it is clearly demonstrated that: i. the land affected does not contain potentially workable mineral deposits; and/or ii. there is an overriding need for the development; and iii. the mineral cannot practically be extracted in advance. In accordance with paragraph 212 of the NPPF development proposals in Mineral Safeguarding Areas that might constrain potential future use for mineral working should not normally be permitted. Given the size of the allocation coupled with the potential for sand and gravel deposits to be present beneath the site, the Minerals Planning Authority would request a site investigation and evaluation by way of a Minerals Resource Assessment (MRA) to assess the potential for workable mineral deposits and avoid the possibility of mineral sterilisation. MRAs should be undertaken as early as possible to identify whether prior extraction of sand and gravel will be necessary ahead of developing the site for residential use. If it is identified through the MRA that the prior extraction of sand and gravel is viable at this site, then a separate planning application for mineral extraction will need to be submitted to the Minerals Planning Authority. The District Council is advised to include a requirement on the need for a MRA within the appropriate policy or appropriate section of commentary for this site allocation within the Plan.	Comments noted. The LPA will discuss these comments with the developer including the need to assess the potential suitability of mineral extraction (and that the County Council will object to development jeopardising future mineral extraction), opportunistic extraction during construction and the need for a SWMP at planning application stage.

	With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	
Q29 & 30 CFS6: Do you agree that the site CFS6 is an appropriate development site?		Officer Response CFS6
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site, but careful consideration must be given to the mineral matters set out below. Should the District Council be minded to continue to include this allocation, the need to assess the potential suitability of mineral extraction and how this requirement will fit in with the site's delivery and it's supporting text (or policy text where appropriate) will need to be considered. Site CFS6 is 2.8 hectares and has the potential to accommodate up to 133 dwellings. The Plan states that the site could come forward together with adjacent site PCS21 Land at Love Lane. Site PCS21 is 1.3 hectares and has the potential to accommodate up to 62 dwellings. County of opportunity Both sites are located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. BGS data also identifies potential superficial sand/gravel deposits beneath both sites. Adopted Minerals Local Plan Policy 5: Mineral Sterilisation states: Mineral extraction will be encouraged prior to other development taking place where any significant mineral resource would otherwise be sterilised, or where despoiled land would be improved following restoration. The County Council will object to any development proposals within, or adjacent to areas of potential mineral resource, which would prevent, or prejudice potential future mineral extraction unless it is clearly demonstrated that: i. the land affected does not contain potentially workable mineral deposits; and/or ii. there is an overriding need for the development; and iii. the mineral cannot practically be extracted in advance. In accordance with paragraph 212 of the NPPF development proposals in Mineral Safeguarding Areas that might constrain potential future use for mineral working should not normally be permitted. Given the size of the allocations (when considered together as one) coupled with the potential for sand and gravel deposits to be present beneath the site, the Minerals Planning Authority would request a site investigation and evaluation by way of a MRA to assess the potential for workable mineral deposits and avoid the possibility of mineral sterilisation. MRAs should be undertaken as early as possible to identify whether prior extraction of sand and gravel will be necessary ahead of developing the site for residential use. If it is identified through the MRA that the prior extraction of sand and gravel is viable at this site, then a separate planning application for mineral extraction will need to be submitted to the Minerals Planning Authority. The District Council is advised to include a requirement on the need for a MRA within the appropriate policy or appropriate section of commentary for this site allocation within the Plan.	Comments noted. The LPA will discuss these comments with the developer including the need to assess the potential suitability of mineral extraction (and that the County Council will object to development jeopardising future mineral extraction), opportunistic extraction during construction and the need for a SWMP at planning application stage.
Q31 & 32 PCS21: Do you agree that the site PCS21 is an appropriate development site?		Officer Response PCS21
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site, however, careful consideration should be given to minerals and waste matters. Site CFS6 is 2.8 hectares and has the potential to accommodate up to 133 dwellings. The Plan states that the site could come forward together with adjacent site PCS21 Land at Love Lane. Site PCS21 is 1.3 hectares and has the potential to accommodate up to 62 dwellings.	Comments noted. The LPA will discuss these comments with the developer including the need to assess the potential suitability of mineral extraction (and that the County Council will object to development jeopardising future mineral extraction), opportunistic extraction during construction and the

	County of opportunity Both sites are located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. BGS data also identifies potential superficial sand/gravel deposits beneath both sites. Adopted Minerals Local Plan Policy 5: Mineral Sterilisation states: Mineral extraction will be encouraged prior to other development taking place where any significant mineral resource would otherwise be sterilised, or where despoiled land would be improved following restoration. The County Council will object to any development proposals within, or adjacent to areas of potential mineral resource, which would prevent, or prejudice potential future mineral extraction unless it is clearly demonstrated that: i. the land affected does not contain potentially workable mineral deposits; and/or ii. there is an overriding need for the development; and iii. the mineral cannot practically be extracted in advance. In accordance with paragraph 212 of the NPPF development proposals in Mineral Safeguarding Areas that might constrain potential future use for mineral working should not normally be permitted. Given the size of the allocations (when considered together as one) coupled with the potential for sand and gravel deposits to be present beneath the site, the Minerals Planning Authority would request a site investigation and evaluation by way of a MRA to assess the potential for workable mineral deposits and avoid the possibility of mineral sterilisation. MRAs should be undertaken as early as possible to identify whether prior extraction of sand and gravel will be necessary ahead of developing the site for residential use. If it is identified through the MRA that the prior extraction of sand and gravel is viable at this site, then a separate planning application for mineral extraction will need to be submitted to the Minerals Planning Authority. The District Council is advised to include a requirement on the need for a MRA within the appropriate policy or appropriate section of commentary for this site allocation within the Plan.	need for a SWMP at planning application stage.
Q33 & 34 CFS65: Do you agree that the site CFS65 is an appropriate development site?		Officer Response CFS65
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site. Special consideration will need to be given to waste matters given the site's proximity to nearby waste uses. Site CFS65 falls within the Sand and Gravel Belt, and BGS data also identifies potential sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. Site CFS65 is located south of two existing safeguarded waste management facilities namely Waterdale Recycling Centre (RC) and Waste Transfer Station (WTS) (collectively referred to as Waterdale). Waterdale, as mentioned in previous responses, is identified as an Allocated Site (ref: AS041) in the adopted Waste Site Allocations Development Plan Document (DPD) and as such is acceptable in principle for a range of potential waste uses. Waterdale is also identified as an existing Strategic Site in the adopted Waste Core Strategy & Development Management Policies DPD, as the site is essential to the current and future waste management of Local Authority Collected waste in the county.	Comments noted. The LPA will discuss these comments with the developer including the need to assess the potential suitability of mineral extraction (and that the County Council will object to development jeopardising future mineral extraction), opportunistic extraction during construction and the need for a SWMP at planning application stage.

	In line with adopted waste Policy 5: Safeguarding of Sites, the county council will oppose development proposals that are likely to prevent or prejudice the use of land identified or safeguarded for waste management purposes. All District and Borough Council's must apply the NPPF's 'agent of change' principle (paragraph 187) when considering proposals for non-waste related developments which fall within the vicinity of any safeguarded waste management facility. This states that planning decisions on new developments should ensure integration with existing business such that they do not have unreasonable restrictions placed upon them. The National Planning Policy for Waste also states at paragraph 8 that: 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 County of opportunity 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. In response to the District Council's 2021 Regulation 18 consultation on the Preferred Policy Options and Sites for Potential Allocation, the MWPA explained the county council has acquired the parcel of land known as Brookdell Yard and that this parcel of land will be used to expand and improve operations at Waterdale. As the District Council will be aware, the shredding facility now has planning permission (planning reference number: PL/0276/22). In response to the 2021 consultation, the MWPA requested that the separation buffer as referred to in the commentary for site CSF65 should be adjusted so that it takes into consideration the parcel of land at Brookdell Yard. A minimum 100m buffer distance between the nearest dwellings and the boundary of Brookdell Yard must be applied. This results in a reduced area available for housing development to approximately 3 hectares according to our calculations. There are two different site areas given in the Plan (4.2ha in the comments and 3.2ha in the Size(ha) box). It appears that the site area has been revised (down to 3.2 hectares) but this has not been reflected in the comments associated with the allocation. The comments currently state the following about the buffer distance: 'A minimum 100m buffer distance between the nearest dwellings and the boundary of the Waterdale Household Waste Recycling Centre (located to the north) would be required as part of any development, which has reduced the developable area to approximately 4.2ha'. The comments should be revised to read as follows: 'A minimum 100m buffer distance between the nearest dwellings and the boundary of Brookdell Yard (located to the north) would be required as part of any development, which has reduced the developable area to approximately 3.2ha'.	
Q35 & 36 NSS2: Do you agree that the site NSS2 is an appropriate development site?		Officer Response NSS2
Yes	[Summary of comments. Full PDF available on request] The site falls within the Sand and Gravel Belt, and BGS data also identifies potential sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted County of opportunity and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planning application stage.

	With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition. For Question 38, It should be noted that the site NSS6a falls adjacent to an area of Historic Landfill (reference: EAHLD35959). The presence of and risk from contaminative materials should be a consideration in any proposal at this site.	
Q37 & 38 NSS6a: Do you agree that the site NSS6a is an appropriate development site?		Officer Response NSS6a
Yes	[Summary of comments. Full PDF available on request] The site falls within the Sand and Gravel Belt, and BGS data also identifies potential sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted County of opportunity and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition. For Question 38, It should be noted that the site NSS6a falls adjacent to an area of Historic Landfill (reference: EAHLD35959). The presence of and risk from contaminative materials should be a consideration in any proposal at this site.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planing application stage
Q39 & 40 NSS10: Do you agree that the site NSS10 is an appropriate development site?		Officer Response NSS10
Yes	[Summary of comments. Full PDF available on request] Site NSS10 is located on an area of Historic Landfill (reference: EAHLD12879). The presence of and risk from contaminative materials should be a consideration in any proposal at this site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition	Comments noted. The LPA will discuss these comments with the developer including the potential for contaminative materials and the need for a SWMP at planing application stage.
Q41 & 42 ACFS8b: Do you agree that the site ACFS8b is an appropriate development site?		Officer Response ACFS8b
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data identifies potential deposits only beneath a small portion of the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planning application stage.
Q43 & 44 H7: Do you agree that the site H7 is an appropriate development site?		Officer Response H7

Yes	[Summary of comments. Full PDF available on request] The site is located entirely within the Sand and Gravel Belt which is identified in the adopted Minerals Local Plan 2007. BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planning application stage.
Q45 & 46 CFS16: Do you agree that the site CFS16 is an appropriate development site?		Officer Response CFS16
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planning application stage.
Q47 & 48 CW9: Do you agree that the site CW9 is an appropriate development site?		Officer Response CW9
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q49 & 50 CFS18c: Do you agree that the site CFS18c is an appropriate development site?		Officer Response CFS18c
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planning application stage.
Q51 & 52 ACFS1: Do you agree that the site ACFS1 is an appropriate development site?		Officer Response ACFS1
Neutral	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planning application stage.

	minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	
Q53 & 54 NSS23: Do you agree that the site NSS23 is an appropriate development site?		Officer Response NSS23
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planing application stage.
Q55 & 56 EOS12.4: Do you agree that the site EOS12.4 is an appropriate development site?		Officer Response EOS12.4
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site, but careful consideration must be given to the mineral matters set out below. Should the District Council be minded to continue to include this allocation, the need to assess the potential suitability of mineral extraction and how this requirement will fit in with the site's delivery and it's supporting text (or policy text where appropriate) will need to be considered. Site EOS12.4 is 17.18 hectares and has the potential to accommodate up to 850 dwellings. The site is located entirely within the Sand and Gravel Belt. BGS data also identifies potential superficial sand/gravel deposits beneath the site. Adopted Minerals Local Plan Policy 5: Mineral Sterilisation states: Mineral extraction will be encouraged prior to other development taking place where any significant mineral resource would otherwise be sterilised, or where despoiled land would be improved following restoration. The County Council will object to any development proposals within, or adjacent to areas of potential mineral resource, which would prevent, or prejudice potential future mineral extraction unless it is clearly demonstrated that: i. the land affected does not contain potentially workable mineral deposits; and/or ii. there is an overriding need for the development; and iii. the mineral cannot practically be extracted in advance. County of opportunity In accordance with paragraph 212 of the NPPF development proposals in Mineral Safeguarding Areas that might constrain potential future use for mineral working should not normally be permitted. Given the size of the allocation coupled with the potential for sand and gravel deposits to be present beneath the site, the Minerals Planning Authority would request a site investigation and evaluation by way of a MRA to assess the potential for workable mineral deposits and avoid the possibility of mineral sterilisation. MRAs should be undertaken as early as possible to identify whether prior extraction of sand and gravel will be necessary ahead of developing the site for residential use. If it is identified through the MRA that the prior extraction of sand and gravel is viable at this site, then a separate planning application for mineral extraction will need to be submitted to the Minerals Planning Authority. The District Council is advised to include a requirement on the need for a MRA within the appropriate policy or appropriate section of commentary for this site allocation within the Plan. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP)	The LPA note the amended comments dated 19.02.2024, withdrawing comments for the site needing to undertake a Mineral Resource Assessment (MRA) and the advice that a requirement on the need for a MRA should be included within the appropriate policy or appropriate section of commentary for the site allocation. The LPA will discuss HCC Minerals and Waste's comments with the developer, including the request for a SWMP at a planning application stage.

	prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	
Q57 & 58 MC11: Do you agree that the site MC11 is an appropriate development site?		Officer Response MC11
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q59 & 60 EOS 7.0: Do you agree that the site EOS 7.0 is an appropriate development site?		Officer Response EOS 7.0
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site, but careful consideration must be given to the mineral matters set out below. Should the District Council be minded to continue to include this allocation, the need to assess the potential suitability of mineral extraction and how this requirement will fit in with the site's delivery and it's supporting text (or policy text where appropriate) will need to be considered. Site EOS7.0 is 20.8 hectares and has the potential to accommodate up to 550 dwellings. The site is located entirely within the Sand and Gravel Belt. BGS data also identifies potential superficial sand/gravel deposits beneath the site. Adopted Minerals Local Plan Policy 5: Mineral Sterilisation states: Mineral extraction will be encouraged prior to other development taking place where any significant mineral resource would otherwise be sterilised, or where despoiled land would be improved following restoration. County of opportunity The County Council will object to any development proposals within, or adjacent to areas of potential mineral resource, which would prevent, or prejudice potential future mineral extraction unless it is clearly demonstrated that: i. the land affected does not contain potentially workable mineral deposits; and/or ii. there is an overriding need for the development; and iii. the mineral cannot practically be extracted in advance. In accordance with paragraph 212 of the NPPF development proposals in Mineral Safeguarding Areas that might constrain potential future use for mineral working should not normally be permitted. Given the size of the allocation coupled with the potential for sand and gravel deposits to be present beneath the site, the Minerals Planning Authority would request a site investigation and evaluation by way of a MRA to assess the potential for workable mineral deposits and avoid the possibility of mineral sterilisation. MRAs should be undertaken as early as possible to identify whether prior extraction of sand and gravel will be necessary ahead of developing the site for residential use. If it is identified through the MRA that the prior extraction of sand and gravel is viable at this site, then a separate planning application for mineral extraction will need to be submitted to the Minerals Planning Authority. The District Council is advised to include a requirement on the need for a MRA within the appropriate policy or appropriate section of commentary for this site allocation within the Plan. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	The LPA note the amended comments dated 19.02.2024, withdrawing comments for the site needing to undertake a Mineral Resource Assessment (MRA) and the advice that a requirement on the need for a MRA should be included within the appropriate policy or appropriate section of commentary for the site allocation. The LPA will discuss HCC Minerals and Waste's comments with the developer, including the request for a SWMP at a planning application stage.
Q61 & 62 P4a: Do you agree that the site P4a is an appropriate development site?		Officer Response P4a
Yes	[Summary of comments. Full PDF available on request]	Comments noted.

	None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	
Q63 & 64: Do you agree that the site P33 is an appropriate development site?		Officer Response P33
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q65 & 66: Do you agree that the site P38 is an appropriate development site?		Officer Response P38
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q67 & 68: Do you agree that the site P39 is an appropriate development site?		Officer Response P39
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q69 & 70: Do you agree that the site RW31 is an appropriate development site?		Officer Response RW31
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will County of opportunity reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planning application stage.
Q71 & 72: Do you agree that the site H15 is an appropriate development site?		Officer Response H15
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will	Comments noted. The LPA will discuss these comments with the developer including opportunistic extraction during construction and the need for a SWMP at planning application stage.

	County of opportunity reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	
Q73 & 74: Do you agree that the site CFS59 is an appropriate development site?		Officer Response CFS59
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planning application stage
Q75 & 76: Do you agree that the site CFS40a is an appropriate development site?		Officer Response CFS40a
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.
Q77 & 78: Do you agree that the site H17 is an appropriate development site?		Officer Response H17
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.

Q79 & 80: Do you agree that the site H18 is an appropriate development site?		Officer Response H18
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q81 & 82: Do you agree that the site H22a is an appropriate development site?		Officer Response H22a
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.
Q83 & 84: Do you agree that the site CFS20 is an appropriate development site?		Officer Response CFS20
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the proposed allocation is located near to a safeguarded waste management site (GPG Auto Services – ELV metal recycling facility). Any future proposals on the allocation may need to consider the nearby safeguarded waste management site and the need incorporate measures to avoid adverse amenity conditions for residents and to avoid any restrictions being placed on the existing facility. The county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.
Q85 & 86: Do you agree that the site CG16 is an appropriate development site?		Officer Response CG16
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.

Q87 & 88: Do you agree that the site CG47 is an appropriate development site?		Officer Response CG47
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will County of opportunity reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.
Q89 & 90: Do you agree that the site CG65 is an appropriate development site?		Officer Response CG65
Yes	[Summary of comments. Full PDF available on request] The MWPA agrees that this could be an appropriate development site.	Comments noted.
Q91 & 92: Do you agree that the site H9 is an appropriate development site?		Officer Response H9
Neutral	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planning application stage.
Q93 & 94: Do you agree that the site CFS61 is an appropriate development site?		Officer Response CFS61
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will County of opportunity reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.

Q95 & 96: Do you agree that the site CFS12 is an appropriate development site?		Officer Response CFS12
Yes	[Summary of comments. Full PDF available on request] The proposed site is located entirely within the Sand and Gravel Belt, and BGS data also identifies potential superficial sand/gravel deposits beneath the majority of the site. The council would like to encourage opportunistic extraction at the site. Opportunistic extraction refers to cases where preparation of the site for built development may result in suitable material being uncovered that could be extracted and processed for use on site as part of the development. This may include excavating the foundations and footings or landscaping works associated with the development. The council recognises that there will be limited scope for opportunistic extraction where sites are already developed. Opportunistic use of minerals will reduce the need to transport sand and gravel to the site and make sustainable use of these valuable finite resources. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including potential for opportunistic extraction and the need for a SWMP at planning application stage.
Q97 & 98: Do you agree that the site AS13 is an appropriate development site?		Officer Response AS13
Yes	[Summary of comments. Full PDF available on request] nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q99 & 100: Do you agree that the site AS31 is an appropriate development site?		Officer Response AS31
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q101 & 102: Do you agree that the site BR20 is an appropriate development site?		Officer Response BR20
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planning application stage.
Q103 & 104: Do you agree that the site PCS16 is an appropriate development site?		Officer Response PCS16
Yes	[Summary of comments. Full PDF available on request] None of the above allocations would necessitate the need for a Site Waste Management Plan, nor would any give rise to mineral sterilization concerns or safeguarding concerns in connection with minerals and waste infrastructure.	Comments noted.
Q105 & 106: Do you agree that the site H24 is an appropriate development site?		Officer Response H24
Yes	[Summary of comments. Full PDF available on request] The site does not give rise to any mineral sterilisation concerns. Whilst the site falls within the Sand and Gravel Belt, BGS data does not identify any potential deposits beneath the site. With regards to waste, the county council, as the Waste Planning Authority, will expect to see a Site Waste Management Plan (SWMP) prepared to support any application on the site, in line with adopted	Comments noted. The LPA will discuss these comments with the developer including the need for a SWMP at planning application stage.

	Waste Local Plan Policy 12: Sustainable Design, Construction and Demolition.	
SC_P4_00028_Canal & River Trust		
Q39 & 40: Do you agree that the site NSS10 is an appropriate development site?		Officer Response NSS10
Neutral	[Summary of comments. Full PDF available on request] The site does directly adjoin the canal corridor and any development would therefore need to have particular regard to any potential impacts to the canal and include appropriate assessments and mitigation. The detail within the consultation suggests that the site could accommodate up to 20no. units though considering the limited depth of the site it is difficult to see how this quantum of development with associated access road, parking, external amenity spaces etc could successfully be accommodated within the site, even before any potential EA requirement for an 8m buffer strip is factored in. The Trust would require much greater detail to demonstrate how that could be achieved in a way that delivers high quality place making. There are existing trees at the back of the towpath which would need to be retained and proposals for boundary treatment would require careful consideration. Any submission would need to consider shading to the canal corridor and it would also be important to ensure that external areas are designed and laid out appropriately with car parking and bin storage screened from the view of the waterway. As identified in the consultation a Heritage Statement would be required and this should consider the listed Sparrow's Herne Bridge to the south and take into account the fact that the canal corridor, including structures such as the adjacent lock, are non-designated heritage assets. The provision of an area of meaningful open space around the lock and to the south of the site to protect the setting of the listed Sparrow's Herne Bridge may also be required.	Comments noted. The LPA will discuss the Canal and River Trusts comments with the developers. Discussion topics will include: - Concerns about quantum of development and how access road, parking, amenity space, 8m buffer etc would be provided -Trust requires greater detail regarding high quality place making, i.e design and retention of trees -A Heritage Statement should consider the Listed Sparrow's Herne Bridge and non-designated heritage assets such as the adjacent lock -The provision of an area of meaningful open space around the lock and to the south of the site to protect the setting of the listed Sparrow's Herne Bridge may also be required.
Q41 & 42: Do you agree that the site ACFS8b is an appropriate development site?		Officer Response ACFS8b
Neutral	[Summary of comments. Full PDF available on request] The site is set back from the canal though it adjoins the Mill Stream which is linked to the canal. Any proposals should therefore consider potential impacts to water quality and provide appropriate landscape screening to soften any wider views of the development from the canal corridor.	Comments noted. The LPA will discuss the Canal and River Trust's comments with the developer, including potential impacts to water quality and the need to provide appropriate landscape screening to soften any wider views of the development from the canal corridor.
Q81 & 82: Do you agree that the site H22a is an appropriate development site?		Officer Response H22a
Neutral	[Summary of comments. Full PDF available on request] The site is set back from the canal though the site would appear to be at a higher ground level. Therefore, to mitigate any visual impact and retain the landscaped setting of the canal corridor additional planting to the site boundary should be required. Considering the difference in land levels full drainage details would also be required with any submission.	Comments noted. The LPA will discuss the Canal and River Trust's comments with the developer. Additionally, flood related policies would be applied at the planning application stage. Through Local Plan policy, any development would be required to respond to distinctive local character (including landscape character) and would have to consider a design criteria.
SC_P4_00029_Hertsmere Borough Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852		Officer Response Housing Numbers

 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		
Neutral	[Summary of comments. Full PDF available on request] -It is clear that there are several shared characteristics between Three Rivers District Council and Hertsmere Borough Council in terms of settlement pattern and size, and green belt coverage (both around three quarters of the local authority area). Lack of available brownfield land is acknowledged to be a common denominator between the boroughs due to the relatively small settlement sizes and the absence of historic large scale industry in the areas. -Addressing the acute need for housing is vital -Evidence for housing Need - If a local authority is planning to provide significantly less homes than set out in the standard methodology, (42% of the total need in the proposed approach in your preferred option consultation), there needs to be clear and justified reasons why this is the case. - The Green Belt as a constraint to development - concerned that the level of reduction proposed, when compared to both the previous consultation and in particular, the quantum suggested by officers in the report of 24 August 2023 to the Local Plan Sub-Committee has not been clearly justified. Suggest that more robust, technical justification may be needed for the low growth option. -We have reviewed the housing sites proposed and do not have any specific comments. We do not consider any to be close enough to our centres of population or large enough to impact directly on our infrastructure. However, we will want to continue working with you on areas of cross boundary interest, including strategic infrastructure requirements. In the absence of more robust justification for the approach being taken, we have concerns that the removal of a number of strategic sites from the plan moving forward will be problematic in terms of the soundness of the plan.	It is acknowledged that there are shared characteristics between the borough of Hertsmere and Three Rivers District, including similar levels of Green Belt. It is considered that the standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental, infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target. Paragraph 11 of the NPPF states that "strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needsthat cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area". Footnote 7 of the NPPF states "The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty". As set out in Footnote 7, land designated as Green Belt is listed as a reason as to why the scale, type and distribution of development within the plan area may be restricted. The LPA will continue to undertake discussions with neighbouring authorities such as Hertsmere as part of its Duty to Co-operate.
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Neutral	[Summary of comments. Full PDF available on request] -It is clear that there are several shared characteristics between Three Rivers District Council and Hertsmere Borough Council in terms of settlement pattern and size, and green belt coverage (both around three quarters of the local authority area). Lack of available brownfield land is acknowledged to be a common denominator between the	It is considered that the standard method figures should be taken forwards as providing an appropriate assessment of housing need. It is for the plan-making process to balance housing need with environmental,

	boroughs due to the relatively small settlement sizes and the absence of historic large scale industry in the areas. -Addressing the acute need for housing is vital -Evidence for housing Need - If a local authority is planning to provide significantly less homes than set out in the standard methodology, (42% of the total need in the proposed approach in your preferred option consultation), there needs to be clear and justified reasons why this is the case. - The Green Belt as a constraint to development - concerned that the level of reduction proposed, when compared to both the previous consultation and in particular, the quantum suggested by officers in the report of 24 August 2023 to the Local Plan Sub-Committee has not been clearly justified. Suggest that more robust, technical justification may be needed for the low growth option. -We have reviewed the housing sites proposed and do not have any specific comments. We do not consider any to be close enough to our centres of population or large enough to impact directly on our infrastructure. However, we will want to continue working with you on areas of cross boundary interest, including strategic infrastructure requirements. In the absence of more robust justification for the approach being taken, we have concerns that the removal of a number of strategic sites from the plan moving forward will be problematic in terms of the soundness of the plan.	infrastructure and policy constraints – including Green Belt – drawing together the housing need with the wider evidence base, to define what level of housing provision should be planned for. The housing need figures are thus an advisory starting point rather than a housing requirement or target. Paragraph 11 of the NPPF states that "strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area". Footnote 7 of the NPPF states "The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 187) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty". As set out in Footnote 7, land designated as Green Belt is listed as a reason as to why the scale, type and distribution of development within the plan area may be restricted. The LPA will continue to undertake discussions with neighbouring authorities such as Hertsmere as part of its Duty to Co-operate.
General Comments		Officer Response General Comments
	[Summary of comments. Full PDF available on request] We recognise that there are challenges in justifying such a housing figure which deviates so much from the standard method. However, such a deviation has the potential to impact on neighbouring authorities within the same housing market area. In the absence of more robust justification for the approach being taken, we have concerns that the removal of a number of strategic sites from the plan moving forward will be problematic in terms of the soundness of the plan.	Comments noted. The LPA will continue to undertake discussions with neighbouring Local Authorities such as Hertsmere Borough Council as part of its Duty to Co-operate.
SC_P4_00031_Natural England		
Q7 & 8: Do you agree that the site AB18 is an appropriate development site?		Officer Response AB18
Neutral	[Summary of comments. Full PDF available on request] The following allocations are located within the proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns AONB: - AB18 - NSS2 - NSS6a - NSS10	Comments Noted.

	- CFS59 Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas.	
Q23 & 24: Do you agree that the site NSS14 is an appropriate development site?		Officer Response NSS14
Neutral	[Summary of comments. Full PDF available on request] Two proposed allocations (NSS14 and NSS2) either have ancient woodland within their red line boundary or are close to ancient woodland so have the potential to adversely impact ancient woodland, in particular through recreational pressure. You should consider site specific policies requiring alternative natural greenspaces (ANGs) to mitigate for potential recreational effects on affected ancient woodland.	Comments noted. The LPA will discuss Natural England's comments with the developer.
Q29 & 30: Do you agree that the site CFS6 is an appropriate development site?		Officer Response CFS6
Neutral	[Summary of comments. Full PDF available on request] The site is within the zone of influence for Chilterns Beechwoods Special Area of Conservation (SAC). For larger developments that fall within the ZOI and result in a net increase of more than 100 dwellings we recommend further consultation with Natural England to determine the recreational impacts and any requirement for mitigation measures. 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).	Comments noted. The LPA will discuss Natural England's comments with the developer, as well as likely undertake further discussions with Natural England.
Q31 & 32: Do you agree that the site PCS21 is an appropriate development site?		Officer Response PCS21
Neutral	[Summary of comments. Full PDF available on request] The site is within the zone of influence for Chilterns Beechwoods Special Area of Conservation (SAC). For larger developments that fall within the ZOI and result in a net increase of more than 100 dwellings we recommend further consultation with Natural England to determine the recreational impacts and any requirement for mitigation measures. 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).	Comments noted. The LPA will discuss Natural England's comments with the developer, as well as likely undertake further discussions with Natural England.
Q33 & 34: Do you agree that the site CFS65 is an appropriate development site?		Officer Response CFS65
Neutral	[Summary of comments. Full PDF available on request] Our review of the additional allocations submitted indicates that at least five of these allocations, namely CFS65: Land north of Bucknalls Lane; EOS12.4: Land west and south of Maple Cross; CFS40a: Land at Park Road; CFS20: Land at Croxley Station Watford Road and CFS61: Cinnamon House Cassiobridge appear to trigger NEs SSSI Impact Risk Zones for residential development (please refer to previous consultation responses for further details). Such developments could impact Bricket wood common SSSI; Mid Colne Valley SSSI; and Croxley common moor SSSI and are likely to require consultation with Natural England. However, we expect all allocations to identify opportunities to contribute towards delivering the Nature Recovery Network by environmental enhancement, including Biodiversity Net Gain, secured through robust Plan policies.	Comments noted. The LPA will discuss Natural England's comments with the developer and undertake further discussions with Natural England where necessary.
Q35 & 36: Do you agree that the site NSS2 is an appropriate development site?		Officer Response NSS2
Neutral	[Summary of comments. Full PDF available on request] The following allocations are located within the proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns AONB:	Comments noted. The LPA will discuss Natural England's comments with the developer.

	- AB18 - NSS2 - NSS6a - NSS10 - CFS59 Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas. Two proposed allocations (NSS14 and NSS2) either have ancient woodland within their red line boundary or are close to ancient woodland so have the potential to adversely impact ancient woodland, in particular through recreational pressure. You should consider site specific policies requiring alternative natural greenspaces (ANGs) to mitigate for potential recreational effects on affected ancient woodland.	
Q37 & 38: Do you agree that the site NSS6a is an appropriate development site?		Officer Response NSS6a
Neutral	[Summary of comments. Full PDF available on request] The following allocations are located within the proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns AONB: - AB18 - NSS2 - NSS6a - NSS10 - CFS59 Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas.	Comments noted.
Q39 & 40: Do you agree that the site NSS10 is an appropriate development site?		Officer Response NSS10
Neutral	[Summary of comments. Full PDF available on request] The following allocations are located within the proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns AONB: - AB18 - NSS2 - NSS6a - NSS10 - CFS59 Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas.	Comments noted.
Q55 & 56: Do you agree that the site EOS12.4 is an appropriate development site?		Officer Response EOS12.4

Neutral	[Summary of comments. Full PDF available on request] EOS12.4: Land west and south of Maple Cross appear to trigger NEs SSSI Impact Risk Zones for residential development (please refer to previous consultation responses for further details). Such developments could impact Mid Colne Valley SSSI and are likely to require consultation with Natural England. However, we expect all allocations to identify opportunities to contribute towards delivering the Nature Recovery Network by environmental enhancement, including Biodiversity Net Gain, secured through robust Plan policies. The Chilterns Area of Outstanding Natural Beauty (AONB) is referenced within the Sustainability Appraisal Note submitted alongside Part 4 of the Reg 18 consultation. Several allocations fall within the AONB, namely: ACFS1; NSS23; EOS12.4; EOS7.0; CFS59; CFS40a; H22a; CFS20; and CFS61. We would expect to see a policy that requires assessment of development applications to ascertain whether the proposed development would have a significant impact on or harm that statutory purpose.	Comments noted. The LPA will discuss Natural England's comments with the developer, including potential impact of development on SSSI's and AONB's. The LPA will undertake further discussions with Natural England where necessary.
Q73 & 74: Do you agree that the site CFS59 is an appropriate development site?		Officer Response CFS59
Neutral	[Summary of comments. Full PDF available on request] The following allocations are located within the proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns AONB: - AB18 - NSS2 - NSS6a - NSS10 - CFS59 Although the assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the development proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 174 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 176 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas. Our review of the additional allocations submitted indicates that at least five of these allocations, namely CFS65: Land north of Bucknalls Lane; EOS12.4: Land west and south of Maple Cross; CFS40a: Land at Park Road; CFS20: Land at Croxley Station Watford Road and CFS61: Cinnamon House Cassiobridge appear to trigger NEs SSSI Impact Risk Zones for residential development (please refer to previous consultation responses for further details). Such developments could impact Bricket wood common SSSI; Mid Colne Valley SSSI; and Croxley common moor SSSI and are likely to require consultation with Natural England. However, we expect all allocations to identify opportunities to contribute towards delivering the Nature Recovery Network by environmental enhancement, including Biodiversity Net Gain, secured through robust Plan policies.	Comments noted. The LPA will discuss Natural England's comments with the developer and undertake further discussions with Natural England where necessary.
Q83 & 84: Do you agree that the site CFS20 is an appropriate development site?		Officer Response CFS20
Neutral	[Summary of comments. Full PDF available on request] Our review of the additional allocations submitted indicates that at least five of these allocations, namely CFS65: Land north of Bucknalls Lane; EOS12.4: Land west and south of Maple Cross; CFS40a: Land at Park Road; CFS20: Land at Croxley Station Watford Road and CFS61: Cinnamon House Cassiobridge appear to trigger NEs SSSI Impact Risk Zones for residential development (please refer to previous consultation responses for further details). Such developments could impact Bricket wood common SSSI; Mid Colne Valley SSSI; and Croxley common moor SSSI and are likely to require consultation with Natural England. However, we expect all allocations to identify opportunities to contribute towards delivering the Nature	Comments noted. The LPA will discuss Natural England's comments with the developer and undertake further discussions with Natural England where necessary.

	Recovery Network by environmental enhancement, including Biodiversity Net Gain, secured through robust Plan policies.	
Q93 & 94: Do you agree that the site CFS61 is an appropriate development site?		Officer Response CFS61
Neutral	[Summary of comments. Full PDF available on request] Our review of the additional allocations submitted indicates that at least five of these allocations, namely CFS65: Land north of Bucknalls Lane; EOS12.4: Land west and south of Maple Cross; CFS40a: Land at Park Road; CFS20: Land at Croxley Station Watford Road and CFS61: Cinnamon House Cassiobridge appear to trigger NEs SSSI Impact Risk Zones for residential development (please refer to previous consultation responses for further details). Such developments could impact Bricket wood common SSSI; Mid Colne Valley SSSI; and Croxley common moor SSSI and are likely to require consultation with Natural England. However, we expect all allocations to identify opportunities to contribute towards delivering the Nature Recovery Network by environmental enhancement, including Biodiversity Net Gain, secured through robust Plan policies.	Comments noted. The LPA will discuss Natural England's comments with the developer and undertake further discussions with Natural England where necessary.
General Comments		Officer Response General Comments
	[Full PDF available on request]	The LPA will continue to undertake discussions with relevant bodies such as Natural England as part of its Duty to Co-operate.
SC_P4_00032_Harrow Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Yes	[Summary of comments. Full PDF available on request] The current Part 4 Regulation 18 with the lower growth option, has removed a number of Green Belt sites that were previously proposed to be de-designated from Green Belt. The Council welcome the revised approach.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		Officer Response Sites not taken forward
Yes	[Summary of comments. Full PDF available on request] The current Part 4 Regulation 18 with the lower growth option, has removed a number of Green Belt sites that were previously proposed to be de-designated from Green Belt. The Council welcome the revised approach, and specifically the removal of site PCS47 as a site sought to be released as set out in Appendix 1 – Sites not proposed for development by TRDC (Page 11)	Comments noted.
SC_P4_00034_National Highways		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for		Officer Response Housing Numbers

calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		
Neutral	[Summary of comments. Full PDF available on request] As is customary where housing numbers for a local plan are proposed, National Highways remains impartial, leaving the planning authority to argue its case. The housing numbers will be considered as part of the overall soundness of the plan by the planning inspector following or during the local plan examination in public.	Comments noted.
Q23 & 24: Do you agree that the site NSS14 is an appropriate development site?		Officer Response NSS14
Neutral	[Summary of comments. Full PDF available on request] Two proposed allocations (NSS14 and NSS2) either have ancient woodland within their red line boundary or are close to ancient woodland so have the potential to adversely impact ancient woodland, in particular through recreational pressure. You should consider site specific policies requiring alternative natural greenspaces (ANGs) to mitigate for potential recreational effects on affected ancient woodland.	Comments noted. The LPA will discuss Natural England's comments with the developer.
Q27 & 28: Do you agree that the site CFS3 is an appropriate development site?		Officer Response CFS3
Neutral	[Summary of comments. Full PDF available on request] Looking at the proposed development sites across the district, for subsequent planning applications National Highways would also require individual transport assessments alongside reviews of sustainability and net zero proposals covering the larger sites as follows:	Comments noted. The LPA will discuss National Highways' comments with the developer.
Q33 & 34: Do you agree that the site CFS65 is an appropriate development site?		Officer Response CFS65
Neutral	[Summary of comments. Full PDF available on request] Looking at the proposed development sites across the district, for subsequent planning applications National Highways would also require individual transport assessments alongside reviews of sustainability and net zero proposals covering the larger sites as follows:	Comments noted. The LPA will discuss with the developer that a planning application stage, individual transport assessments alongside reviews of sustainability and net zero proposals would be required at this site.
Q45 & 46: Do you agree that the site CFS16 is an appropriate development site?		Officer Response CFS16
Neutral	[Summary of comments. Full PDF available on request] Looking at the proposed development sites across the district, for subsequent planning applications National Highways would also require individual transport assessments alongside reviews of sustainability and net zero proposals covering the larger sites as follows:	Comments noted. The LPA will discuss National Highways' comments with the developer.
Q55 & 56: Do you agree that the site EOS12.4 is an appropriate development site?		Officer Response EOS12.4
Neutral	[Summary of comments. Full PDF available on request] Looking at the proposed development sites across the district, for subsequent planning applications National Highways would also require individual transport assessments alongside reviews of sustainability and net zero proposals covering the larger sites.	Comments noted. The LPA will discuss National Highways' comments with the developer.
Q59 & 60: Do you agree that the site EOS7.0 is an appropriate development site?		Officer Response EOS7.0
Neutral	[Summary of comments. Full PDF available on request] Looking at the proposed development sites across the district, for subsequent planning applications National Highways would also require individual transport assessments alongside reviews of sustainability and net zero proposals covering the larger sites as follows:	Comments noted. The LPA will discuss National Highways' comments with the developer.
General Comments		Officer Response General Comments

	[Summary of comments. Full PDF available on request] We look forward to continuing to participate in future consultations and discussions.	Comments noted. The LPA will continue to undertake discussions with relevant bodies such as National Highways as part of its Duty to Co-operate.
SC_P4_00036_Nash Mills Parish Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Yes	[Summary of comments. Full PDF available on request] NMPC commend Three Rivers for considering the impact on our precious green spaces and working to protect them from high harm.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Yes	[Summary of comments. Full PDF available on request] NMPC commend Three Rivers for considering the impact on our precious green spaces and working to protect them from high harm.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review
SC_P4_00007_Sport England		
Q33 & 34: Do you agree that the site CFS65 is an appropriate development site?		Officer Response CFS65
No	No objection is made to the principle of the loss of the former Penfold Park Golf Club that closed in 2016. This is because golf facility needs were assessed as part of the Council's Playing Pitch Strategy (2019) and concluded that the current supply of golf facilities in Three Rivers district (excluding Penfold Park) can meet current and future demand without this golf course being brought back into use. However, the strategy's action plan (page 58 of the Playing Pitch Strategy & Action Plan), included a site specific recommended action to mitigate the loss of the site through firstly seeking to enhance the golfing offer in the district or by creating an alternative non-traditional golf provision or	Comments noted. The LPA will discuss the site specific strategy within the Playing Pitch Strategy with the developer as well as the potential developer contributions which may be required

	secondly using developer contributions to improve other playing pitch sites. Given that the Council's Playing Pitch Strategy's forms part of the evidence base for the Local Plan and that the potential allocation of this site would need to demonstrate compliance with paragraph 97 of the NPPF in relation to the loss of sports facility provision, if this site is allocated for residential, the site specific requirements should incorporate the recommendations in the strategy relating to including proposals for mitigating the loss of the former golf course. Without this, the allocation of this site would not be considered to accord with Government policy in the NPPF and would not therefore meet the 'justified' and 'consistent with national policy' tests of soundness. Sport England would be willing to provide advice to the Council and the site promoter on the approach to developing mitigation proposals upon request.	
SC_P4_00013_Denham Parish Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Yes	Smaller quantum of green belt release	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Yes	Less traffic generation that will impact on neighbouring councils areas	Comments noted. Representations from the Hertfordshire Highways Authority will be taken in to consideration. The Transport Assessment will identify mitigation measures required and any identified measures will be included in the Infrastructure Delivery Plan.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		Officer Response Sites not taken forward
Yes	Less impact on neighbouring councils area.	Comments noted.
Q55 & 56: Do you agree that the site EOS12.4 is an appropriate development site?		Officer Response EOS12.4
No	Denham Parish Council has concerns about the increased traffic movements that would result in a development of 850 dwellings and the potential increase of traffic through the Denham Parish area. The infrastructure detailed above should be progressed at the earliest opportunity, along with suitable road layout to remediate traffic	Comments noted. With regards to concerns relating to congestion, traffic and highway safety, representations from the Hertfordshire Highways

	congestion during peak times. As the site is located close to the M25, suggest an AQMA study to view the likely impact arising from this development.	Authority and any other relevant bodies will be taken into consideration.
Q59 & 60: Do you agree that the site EOS7.0 is an appropriate development site?		Officer Response EOS7.0
No	Denham Parish Council has concerns about the increased traffic movements that would result in a development of 850 dwellings and the potential increase of traffic through the Denham Parish area. The infrastructure detailed above should be progressed at the earliest opportunity, along with suitable road layout to remediate traffic congestion during peak times. As the site is located close to the M25, suggest an AQMA study to view the likely impact arising from this development.	Comments noted. With regards to concerns relating to congestion, traffic and highway safety, representations from the Hertfordshire Highways Authority and any other relevant bodies will be taken into consideration.
SC_P4_00017_Chalfont St Peter Parish Council		
Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Yes	The Green Belt is extremely important to our area and it's important that we protect our Green Belt Areas on behalf of our residents.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Yes	This strategy will result in less use of our Green Belt Areas.	Comments noted. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		Officer Response Sites not taken forward
Yes	no comments	Comments noted.
Q55 & 56: Do you agree that the site EOS12.4 is an appropriate development site?		Officer Response EOS12.4

No	Horn Hill Road is an important access Road from Chalfont St Peter to A412/ North Orbital for access to Watford/ Rickmansworth, etc This Green Belt land separates Chalfont St Peter and Maple Cross, it is also the county border between Buckinghamshire and Hertfordshire. Our comment is purely on the IOS 12.4 which affects Chalfont St Peter accesses. We believe it is not sustainable as it does not have the required facilities at present which will be required to achieve sustainability.	Comments noted. With regards to concerns relating to congestion, highway safety, access to the site and sustainability, representations from the Hertfordshire Highways Authority and other relevant bodies will be taken into consideration.
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SC_P4_00011_Watford Rural Parish Council

Q1 & 2: Do you agree with the Council's proposed stance of not complying with the Government's Standard Method for calculating the District's housing need figure owing to Green Belt? This means that the District will only provide 4,852 dwellings against the required 11,466 dwellings if this plan is approved. Please explain your answer.		Officer Response Housing Numbers
Yes	Green Belt must be protected to ensure the following: Preservation of Natural Environment: Green belt areas often host unique ecosystems, flora, and fauna that require protection. They serve as important habitats for wildlife and contribute to biodiversity conservation. Maintaining Open Spaces: Green belt areas offer crucial open spaces for recreational activities, enhancing the quality of life for residents. These spaces contribute to mental and physical well-being, providing areas for leisure, exercise, and relaxation. Flood Risk Mitigation: Green belt land can play a role in natural flood management, absorbing excess water and reducing flood risk for nearby areas. Development can disrupt natural drainage systems and exacerbate flooding. Visual and Cultural Significance: Green belt areas often have scenic beauty and cultural significance, contributing to the local identity and heritage. Development can compromise these landscapes, impacting the visual appeal and historical value. Urban Sprawl Control: Green belt policies help contain urban sprawl, preventing cities from merging into one another and maintaining distinct community identities. Encouraging development on green belt land can lead to unchecked urban expansion and loss of rural character. Agricultural Importance: Some green belt areas may have agricultural value, supporting local food production and sustainable farming practices. Developing these areas can lead to the loss of fertile land, affecting local food sources. Traffic and Infrastructure Strain: Introducing developments in green belt areas can strain existing infrastructure, leading to increased traffic congestion and demands on services like schools and healthcare. Long-Term Impact on Environment: Developing green belt areas contributes to habitat fragmentation and loss, impacting the long-term health of ecosystems and natural resources. Policy Protection and Planning: Green belt policies are in place to ensure sustainable development and thoughtful urban planning, aiming to balance growth with environmental conservation. Violating these policies can set precedents that weaken environmental protections in the area. Alternatives and Brownfield Sites:	Comments noted. The preservation of green belt is important for a variety of reasons. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review.

	Consideration should always be given to alternatives, such as brownfield sites or repurposing existing structures, before encroaching on green belt areas. Preserving green belt land in the Three Rivers District Council area is crucial for maintaining a sustainable, balanced environment that benefits both current and future generations.	
Q3 & 4: Do you agree that the Council's preferred 'Low Growth and Green belt Restraint' option is the best growth strategy for the District? Please explain your answer.		Officer Response Low Growth Option
Yes	Environmental Conservation: Low growth and green belt restraint prioritize the preservation of natural habitats, biodiversity, and ecosystems, minimizing the environmental impact of development. Sustainable Development: It encourages a more sustainable approach to urban planning, focusing on efficient land use and reducing the carbon footprint associated with extensive construction and infrastructure. Resource Optimization: By redeveloping existing urban areas and repurposing brownfield sites instead of encroaching on green belt land, it optimizes the use of available resources and infrastructure. Preserving Scenic and Recreational Spaces: Restraining development on green belt areas ensures that open spaces for recreation, leisure, and natural beauty are preserved for community well-being. Fostering Community Identity: It helps maintain distinct community identities by preventing excessive urban sprawl and preserving the unique characteristics of towns and villages. Infrastructure Efficiency: Focusing growth within existing urban areas allows for better utilization of infrastructure, reducing the need for costly expansion and maintenance of new infrastructure. Economic Benefits: Redeveloping existing areas can lead to economic revitalization, attracting investment and fostering vibrant communities without sacrificing green spaces. Long-Term Sustainability: A low-growth strategy, when combined with green belt restraint, promotes a more balanced and sustainable approach to development that considers the long-term impacts on the environment and quality of life. Policy Consistency and Stability: Following green belt restraints and advocating a low-growth strategy ensures consistency with existing policies, maintaining stability in land-use planning and environmental protections. Encouraging Innovation and Creativity: Limiting expansion into green belt areas encourages innovative approaches to redevelopment, such as adaptive reuse of existing structures or implementing green infrastructure solutions. In essence, a low-growth strategy paired with green belt restraint supports the principles of sustainable development, responsible land use, and environmental conservation while fostering thriving and resilient communities.	Comments noted. The preservation of green belt is important for a variety of reasons. We need to plan for the development needs of the area, to meet these needs it may be necessary to alter Green Belt boundaries. We have taken a brownfield-first approach including undertaking an Urban Capacity study, however, we are unable to meet our needs purely on Previously Developed Land, so some Green Belt development is necessary. We have undertaken a Green Belt review assessing the levels of harm of releasing land for development. Our approach is avoiding sites with above moderate Green Belt harm as set out in our Stage 2 Green belt Review.
Q5 & 6: Do you agree with the sites detailed in Appendix 1 that TRDC are not proposing for development? Please explain your answer.		Officer Response Sites not taken forward

Yes	The large sites located within Carpenders Parks green belt would have 1) enabled urban spread, 2) damaged the local ecology and 3) created numerous traffic issues. The site along Hampermill Lane would have created points 2 & 3, so WRPC welcome their removal.	Comments noted.
Q95 & 96: Do you agree that the site CFS12 is an appropriate development site?		Officer Response CFS12
Yes	Its a yes, with the obvious caveats. The redevelopment must take into account all the reasons given by TRDC planning officers in their decision made for 11/0392/FUL. In addition, to pay particular care to learning from the lessons caused by the South Oxhey Central development by not allowing sufficient parking spaces for residents and office workers. Particular care must also be taken to protect the biodiversity of the stream located on this land.	Comments noted. It is noted that application 11/0392/FUL was refused. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. With regards to wildlife and habitat, the legal requirement for a 10% net gain in biodiversity would be applied at the planning application stage. Policies provide for the retention of trees and hedgerows where possible and replanting, as well as other wildlife related policy. The Environment Agency and other relevant body's representations will be taken into consideration.
Q97 & 98: Do you agree that the site AS13 is an appropriate development site?		Officer Response AS13
No	Where will the garage users park? Loss of parking just leads to more disharmony and potential ASB. The surrounding roads all have to park on the pavement already and cause the highway to be blocked for wheelchair users and mothers with pushchairs as well as causing issues with parking on junction corners. Loss of privacy and light will also be a factor for those houses backing onto the site. Narrow entrance will not allowed two vehicles to pass each other. Potential issues with emergency vehicles and waste lorries also.	Comments noted. Whilst it is noted that the allocation of the site would result in the loss of the garages, as set out in the Council's Local Housing Needs assessment there is a pressing need within the district for housing. The Regulation 18 consultation document states that the Council "will seek to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land". The allocation of garage sites aligns with this approach. Additionally, with regards to access and highway safety concerns, representations from the Hertfordshire Highways Authority will be taken into consideration. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. Development would be required to satisfy a Design Criteria so that the need for privacy for new and existing residential properties meet an acceptable standard and that overlooking is prevented.

Q99 & 100: Do you agree that the site AS31 is an appropriate development site?		Officer Response AS31
No	Loss of parking and the need for residents parking will only increase the current issues being faced due to the lack of parking caused by the nearby redevelopment. We really object to this site due to its locality. The Office of National Statistics states that, at the end of 2018, 78% of households have a car and the average number of cars per household is 1.4. " A recent survey undertaken by WRPC clearly show that Phase 1 car ownership is not meeting the expected numbers of cars. 4% of households indicated having no cars in the household. 56% of households had one car and the remaining 40% had 2 cars an equivalent of 1.48 cars per household. The development has put forward a figure of 0.69 spaces which currently equates to 354 spaces for the original planned number or 455 for the additional units proposed. If we take the numbers recorded in our consultation survey (on Henbury Way Car park), then we are looking at 975 spaces being required for the whole development, including the additional units. This means therefore, that the roads in South Oxhey near to the redevelopment require a staggering 520 possible after TRDC allowed the extra units to be built for phase 3. We must prevent any more issues by another development here. Loss of privacy and light will also be a factor for those houses backing onto the site. The very Narrow entrance will not allowed two vehicles to pass each other. Potential issues with emergency vehicles and waste lorries also as it is so narrow they cannot get down the existing entrance. Due to the houses either side, this cannot be widened.	Comments noted. Whilst it is noted that the allocation of the site would result in the loss of the garages, as set out in the Council's Local Housing Needs assessment there is a pressing need within the district for housing. The Regulation 18 consultation document states that the Council "will seek to maximise the delivery of housing within the built-up urban area including through intensification and higher densities of development to make the most efficient use of land, and making as much use as possible for previously developed brownfield sites and underutilised land". The allocation of garage sites aligns with this approach. Additionally, with regards to access and highway safety concerns, representations from the Hertfordshire Highways Authority will be taken into consideration. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety.
Q101 & 102: Do you agree that the site BR20 is an appropriate development site?		Officer Response BR20
Yes	Brownfield site, containing a dilapidated building. A replacement day care centre is being built nearby. However, we would ask that sufficient parking, or even over allocation of Council policy on parking spaces, is considered here to prevent any safety issues with dangerous or over parking on the street which could cause harm to the schoolchildren of Oxhey Wood School.	Comments noted. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. Additionally, representations from Herts Highways will be taken into consideration.
Q103 & 104: Do you agree that the site PCS16 is an appropriate development site?		Officer Response PCS16
No	Taken from our objection to 19/1961/FUL DM1 of the Development Management Policies document states The Council will protect the character and residential amenity of existing areas of housing from forms of "backland", "infill" or other forms of new residential development which are inappropriate for the area – This is clearly an infill project. We believe that this proposed plan fails under policy DM1 a) v). This type of infill development does not maintain the character of the area with different more narrow design. Under Appendix 2 5. New Development iii) it states that a development must "Respect the character of the street scene, particularly with regard to the spacing of properties, roof form, positioning and style of windows and doors, and materials." This does not follow as it clearly is out of context to the rest of the areas property uniformity. We believe that this proposed plan fails under policy CP12 c) of the Local Development Framework – Core Strategy Document. Concerns have been raised by neighbours regarding the blocking out of light that they have always had.	Comments noted. It is acknowledged that previous applications at the site were refused by the LPA (however, the red line of these applications are different to the proposed site allocation). Through Local Plan policy, any development would be required to respond to distinctive local character (including landscape character) and would have to consider a design criteria. Additionally, policies relating to the protection and preservation of Heritage Assets such as conservation areas would be applied.

	We note and echo the concerns of the public comment where it states that any extra parking along this road will exacerbate the parking issues which currently exist there. Parking is at a premium and adding to this will cause locals difficulty, especially near a main road. This could cause danger to pedestrians which could fall foul of which then causes failures under CP10 (I) of the TRDC's Local Development Framework - Core Strategy Document where it states that a development must make "adequate provision for all users, including car and other vehicle parking, giving priority to people with mobility difficulties, pedestrians, cyclists and equestrians" Councillors recently went on a walk around the playing fields in relation to the Green Space plan being undertaken. Whilst on this walk, rangers showed a badger set which is located near the vicinity. This application may fall foul of the Protection of Badgers Act 1982 specifically offences under section 3. Further, TRDC did not agree to a similar development 06/0490/FUL for the following reasons: The proposed layout would be unsatisfactory in that it would result in a cramped form of development which would not respect the extensive gardens which characterise the Oxhey Hall Estate. As such the proposal would adversely affect the character of the locality, contrary to Policies H14 and GEN3 and Appendix 2 of the Three Rivers Local Plan 1996-2011. It has not been demonstrated that adequate protection could be provided for protected trees on the site, particularly the large mature Oak (T1) close to 44 Vivian Gardens, as proposals, including areas of hardstanding, remain within the recommended root protection areas defined in BS:5837 (2005). Construction is likely to result in damage to trees, contrary to Policies N15 and N16 of the Three Rivers Local Plan 1996-2011.	At a planning application stage, development would be required to satisfy a Design Criteria so that the need for privacy for new and existing residential properties meet an acceptable standard and that overlooking is prevented as well as preventing unacceptable levels of loss of light. Through Local Plan policy, any development would have to provide appropriate levels of parking for vehicles to avoid additional on-street parking where this would cause congestion or harm to amenity or highway safety. With regards to wildlife and habitat, the legal requirement for a 10% net gain in biodiversity would be applied at the planning application stage. Policies provide for the retention of trees and hedgerows where possible and replanting, as well as other wildlife related policy. Additionally, policies relating to protected trees would be applied at the planning application stage.
Q105 & 106: Do you agree that the site H24 is an appropriate development site?		Officer Response H24
Yes	The plot is not used and we agreed for it to be developed in our letter to Planning relating to 22/1342/OUT application.	Comments noted.
General Comments		Officer Response General Comments
	However, WRPC would like to stress how important a detailed infrastructure delivery plan is to any future planning (as TRDC did previously in March 2012). It contains detailed requirements across all Partnerships, such as Heathcare, Police, Housing, Fire etc and we hope that one will be produced alongside this, or certainly when the CIL is updated.	Comments noted. Infrastructure requirements will be identified in the Infrastructure Delivery Plan.