

SCHEDULE OF REPRESENTATIONS

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REPRESENTATION REFERENCE	REPRESENTOR	POLICY/ PART OF DOC	REPRESENTATION	CHANGES REQUIRED	COUNCIL'S RESPONSE	COUNCIL'S PROPOSED ACTION
SA Site Allocations						
60002 /3000 2/SA/C	BAA Heathrow	SA	<p>Given that the boundary for the Three Rivers District Council is more than 13km from the Aerodrome Reference Point (ARP) for Heathrow Airport, we would only have the following comments to make;</p> <p>Wind Turbine Developments</p> <p>The safeguarding requirements for Heathrow Airport includes a circle with a 30 kilometres radius drawn from the aerodrome reference point to indicate the area within which the Planning Authority must consult the Airport Operator on proposed wind turbine development. This recognises the fact that the introduction of wind-powered generator turbines as an alternative energy policy can create problems for aviation. In addition to their potential for presenting a physical obstacle to air navigation, wind turbines can affect radar and other electronic aids to air navigation from radio frequency interference (the rotating blades create electromagnetic disturbance which can degrade the performance of these systems and cause incorrect information to be received). The amount of interference depends on a number of factors; the number of turbines, their size, construction materials, location and shape of blades. A wind turbine development is also likely to be the subject of consultation with the Civil Aviation Authority (CAA), NATS En Route Ltd. (NERL) and the Ministry of Defence (MOD).</p> <p>Government advise applicants to initiate discussions with the Planning Authority and the Airport Operator at an early stage in the process and before submitting an application to ensure that they understand the constraints and provide the information to enable a detailed assessment to be made of the proposed development i.e. a navigational impact assessment study. Where it is determined that a planning application for a proposed development may have an effect on navigational or other aeronautical systems, simulation or other types of interference modelling of the effects of the development may need to be conducted before a decision can be made on the application. It is usual for the developer to bear the cost of the modelling.</p> <p>Within the safeguarding zone around Heathrow Airport shown on the official safeguarding map published to each council. , wind turbine development will be permitted that demonstrates for the duration of the construction period and during operation it will not adversely affect the operation of Heathrow Airport or the navigational aids, communication or surveillance equipment used for air navigation at Heathrow Airport.</p>	No change required.	Comment noted.	No change required.
60120 /3003 1/SA/2	The Wellcome Trust Ltd	SA	<p>Omission Site Ref: H084 'Land West of 10 Toms Lane' has been identified by TRDC as having potential to accommodate residential development since the 2008 SHLAA under reference: BP29. In the February 2009 Core Strategy Preferred Options consultation the site was identified with a potential capacity for 20 dwellings phased during the period 2008 to 2015. This proposed allocation was rolled forward to the Site Allocations Preferred Options Local Development Document in January 2012. The proposed allocation recognised that the release of the site for housing would be consistent with the spatial strategy established within the adopted Three Rivers Core Strategy (TRCS). The site also performs well against the Council's site selection criteria, when compared with other Green Belt sites proposed for allocation. Notwithstanding the favourable performance of the site against the Council's own criteria and spatial strategy, the allocation has not been taken forward to the Submission Site Allocations Local Development Document (SALDD). The decision to omit the site was taken at TRDC Executive Committee on 25 June 2012, following a motion by the Environment Portfolio Holder. The decision was not the result of amendments proposed at an officer level and there is seemingly no evidential basis to support the omission. Subsequent discussions with planning policy officers have however indicated that the reasoning behind this decision relates to the impact of developing the site on the Green Belt and traffic conditions on Toms Lane. This is confirmed within the site assessment provided at Page 88 of the Site Allocations Supporting Information Report (SASIR).</p> <p>Given that TRDC has provided no evidence to support the omission of the site, indeed the SALDD is not justified by a Green Belt Review and we are not aware that the Council has commissioned work to assess the traffic conditions on Toms Lane, it is entirely necessary and appropriate to question the legitimacy of this decision and the resultant impact on the soundness of the SALDD.</p> <p>Site Selection Criteria</p> <p>The site selection criteria which has been used to identify those sites proposed for allocation is provided at Appendix 2 of the TRCS. This confirms that each site has been considered against a set of 48 criteria. For each criteria a score between 1 and 10 has been assigned (1 = poorest performance and 10 = best performance). A weighting is then applied to the score depending on the perceived importance of the criteria. Given the significant emphasis placed on sustainable</p>	In order to address the deficiencies identified above, it is necessary for the SALDD to allocate Land West of 10 Toms Lane for the development of 20 residential dwellings. This change can be effected either at the expense of, or in addition to, Site H(2), Site H(17) or Site H(28). Land West of 10 Toms Lane is immediately deliverable and should be treated as such in the phasing of new development within the SALDD.	<p><u>5% buffer</u></p> <p>The Annual Monitoring Report (2012) sets out that there are 870 dwellings currently with planning permission (full or outline) which are expected to be exhausted by 2019. The AMR also shows that delivery beyond 2015 will rely on sites proposed for allocation in the Site Allocations document coming forward.</p> <p>Appendix 2 of the Annual Monitoring Report (2012) sets out an assessment of whether Three Rivers has a five year supply of deliverable sites for housing. This assessment has been completed in accordance with the NPPF and includes a 5% buffer and shows that Three Rivers does have a five year supply.</p> <p>NPPF paragraph 47 is clear that the 5% buffer should be moved forward from later in the plan period. While the proposed allocations do provide for dwellings in excess of the target, providing a buffer against non-delivery, applying a 5% buffer to the overall housing target set out in the Site Allocations document (which is in accordance with the target set out in the Core Strategy which was adopted following independent examination) would be contrary to the NPPF and is not considered necessary.</p> <p><u>Windfall allowance</u></p> <p>Paragraph 5.19 and Table 2 of the adopted Core</p>	No change considered necessary.

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development by the NPPF, it is entirely appropriate to judge the suitability of sites to accommodate housing development against a range of sustainability criteria. "At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking" (NPPF, para 14). Nonetheless, the TRCS notes that, whilst the site selection criteria will inform the Council's decision on a particular site, in coming to a final decision the Council will consider each site on its merits and take into account sites specific circumstances. It is unclear whether the 'site specific circumstances' referred to are in addition to the 48 criteria already considered or whether this is merely an opportunity for TRDC to opt out of the evidence based approach, should it suit the Council's purposes to do so.

Land West of 10 Toms Lane scored better than four of the sites currently proposed for allocation. Collectively these sites provide capacity for 272 dwellings in locations which do not perform as well as Land West of Toms Lane against that Council's own planning and sustainability criteria. The table below provides a comparison of all five sites.

The spatial strategy established within the TRCS seeks to focus housing development on previously developed land and appropriate infilling opportunities within the Principal Towns, Key Centres and Secondary Centres. Limited development to meet local needs will also take place in the villages of Sarratt and Bedmond. It is also acknowledged that it will be necessary to release Green Belt land to supplement the supply of housing sites. In considering Green Belt sites, the TRCS confirms that priority will be given to previously developed land and sites will be identified at the most sustainable locations on the edge of the Principal Towns, Key Centres and Secondary Centres. The comparison table above confirms that Land West of Toms Lane is consistent with this spatial strategy, as is the Royal British Legion Site in Sarratt.

Langleybury House is previously developed and therefore is given priority over other Green Belt sites, however the preference shown towards previously developed land in this case is at odds with the sustainability principles endorsed by the NPPF. The site is isolated from those locations which are considered to be the most sustainable within the TRCS (Principal Towns, Key Centres and Secondary Centres) and therefore does not benefit from being closely located to existing services/amenities and cannot be easily accessed by modes of transport other than the car. Site H(6) 'Leavesden Pumping Station', although not listed above, would also result in the development of new housing in a Green Belt location which is not consistent with TRDC's own spatial strategy. It is therefore considered that the blind preference towards previously developed land, regardless of its location, will result in a dispersed and unsustainable pattern of residential development which is not consistent with the approach envisaged by the NPPF.

The remaining two sites listed in the table are inconsistent with both the TRCS spatial strategy and TRDC's preference towards previously developed land. Accordingly, there are two sites which did not score as well as Land West of Toms Lane but nonetheless are considered appropriate for allocation to accommodate approximately 60 new dwellings. It must therefore follow that the concerns over Green Belt harm and traffic impact resulting from the development of Land West of 10 Toms Lane are considered to be sufficient to outweigh TRDC's own evidence based site selection process.

Impact of the Green Belt

TRDC has not produced any technical landscape evidence to substantiate concerns over the visual harm that the development of Land West of 10 Toms Lane would have on the Green Belt. By way of comparison, it should be acknowledged that both Site H(17) and Site H(28), discussed above, are also located on the edge of existing built up areas. The site assessments provided within the SASIR states that both sites are capable of creating a defensible boundary against further encroachment. When compared to Land West of 10 Toms Lane, which was supposedly omitted from the SALDD because of Green Belt harm, it is difficult to see how either of the sites would perform better in Green Belt terms. Land West of 10 Toms Lane would fill a gap in existing built form, such that it would be surrounded by existing development on three sides. The continuation of the existing line of development along the remaining boundary would therefore be entirely defensible and would not leave adjoining land vulnerable to development in the future. It is therefore unclear why the site has been treated differently to Site H(17) and Site H(28).

In visual terms, Land West of Toms Lane is extremely well screened by the railway embankment to the east, an extensive bund along Toms Lane to the north and existing built form to the west, whilst views from the south are obscured by established field boundaries, pockets of woodland and existing farm buildings.

Accordingly, in the absence of site specific technical evidence to demonstrate that those Green Belt sites proposed for allocation within the SALDD would be less harmful to the Green Belt than Land West of Toms Lane, it is difficult to attach any weight to the concerns raised by TRDC in this respect.

Traffic Impact on Toms Lane

TRDC has not produced any technical evidence to substantiate concerns over the impact that development of Land West of 10 Toms Lane would have on existing traffic conditions. It is understood that the only technical information produced in order to consider the likely highway and transport impact of the site is that submitted on behalf of The Wellcome Trust to the early

Strategy set out that a windfall allowance of 38 dwellings a year has been included in the trajectory between 2021 and 2026 (a total of 190 dwellings). While NPPF paragraph 48 specifically refers to the potential for windfall sites to be included in the five-year supply where there is compelling evidence, it does not rule out the inclusion of windfall sites in considering longer term housing supply. As accepted through the examination of the Core Strategy, there is evidence to support the inclusion of a windfall allowance in Three Rivers. The windfall allowance has been reviewed and 38 dwellings a year has been found to still be appropriate. While NPPF paragraph 48 excludes delivery on garden land from inclusion in any windfall allowance, the definition of windfall sites in the NPPF is 'sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available'. Therefore while windfalls will normally comprise previously-developed sites, sites not on previously developed land (including garden land) are not excluded from the definition of a windfall. Three Rivers does not have any policy which would necessarily prevent delivery of housing on garden land where other policy objectives would be met, and therefore there it should not be assumed that these sites will no longer contribute to the delivery of housing in Three Rivers. The windfall allowance is therefore considered justified.

Mixed Use Redevelopment

Kings Langley employment area is identified as a proposed housing site with capacity for 150 dwellings. Specific employment sites within this area are also identified under site Ee as having potential for mixed use development, however the housing site H3 includes a wider area than just the sites identified for mixed use development under site Ee. Detailed flood risk modelling has been completed for this area as part of the Strategic Flood Risk Assessment (2012) and shows that no part of the site proposed for allocation would be within flood zone 3. While parts of the site would be within flood zone 2, sequential test (2012) has been carried out indicating that development of this site would be sequentially preferable in accordance with the NPPF. While across the whole of site H3 there is land in multiple ownerships, submissions have been put forward on behalf of some landowners within this area demonstrating that housing is deliverable on some parcels within five years.

Flood Risk

As set out above, the Strategic Flood Risk Assessment was updated in 2012 and revises the assessment of flood risk of some housing sites. No sites are proposed for development within flood zone 3. A 2012 Sequential Test has also been undertaken which demonstrates that the sites proposed are sequentially preferable in accordance with the NPPF and the Environment Agency have commented that they find all of the site allocations to be sound and legally compliant.

Lapse Rate

As the sites proposed for allocation have been individually assessed, a lapse rate has not been included. In addition, while a windfall allowance has only been included between 2021 and 2026 in accordance with the adopted Core Strategy, windfall sites will continue to come forward

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consultation stages. A copy of the submitted Transport Statement, prepared by Millard Consulting and dated 2009, is attached. This confirms that the anticipated number of vehicular trips associated with a development of 20 dwellings would not have a detrimental impact on Toms Lane. It is acknowledged however that there are two other sites proposed for allocation on Toms Lane, with a combined capacity of 30 dwellings and therefore the traffic implications of new development should be considered cumulatively. Based on the TRICS data referred to in the enclosed Transport Statement, the development of 50 new dwellings (all three sites combined) would result in approximately 30 additional vehicular trips on Toms Lane in the AM and PM peak periods. If we assume that 50% of these trips will head east toward Kings Langley and 50% will head west to Bedmond, there would be only 15 additional cars using the principal junctions at either end of Toms Lane during the AM peak (8:00-9:00) and PM peak (17:00-18:00). This equates to 1.25 trips every 5 minutes, within each 1 hour period.

It is accepted that the TRICS data referred to above will have now been superseded by the latest database, however it strongly suggests that TRDC's concerns over the traffic impact of Land West of 10 Toms Lane are entirely unfounded. It is also unclear why the same criticisms have not been directed at the other sites on Toms Lane.

The enclosed Transport Statement also provides details of the proposed access arrangement for Land West of 10 Toms Lane. These confirm that access would be taken from the existing service road which abuts the western boundary of the site and therefore traffic joining Toms Lane would use the existing priority junction. Accordingly, there would be no need for a new junction with Toms Lane which might conflict with the existing road layout.

In contrast to this arrangement, it would seem that Site H(2) - Land at Three Acres, which is located directly opposite Land West of 10 Toms Lane, would require considerable access improvements in order to achieve the necessary standards to serve the proposed 20 dwellings. At present Site H(2) is accessed via a narrow, single lane track joining Toms Lane. This track would need to be upgraded to provide a two way entrance road of at least 4.8m in width (Roads in Hertfordshire: Highway Design Guide 2011) and would also require a pedestrian footway. It is highly questionable, given the boundaries shown within the SALDD, that sufficient land will be available to provide the necessary road. It is also questionable whether sufficient land may be acquired for adjoining properties to provide the necessary visibility splays at the junction with Toms Lane.

In light of the above, TRDC's concerns in respect of the potential traffic impact associated with Land West of 10 Toms Lane are considered to be entirely unfounded. TRDC has not produced any technical evidence to substantiate these concerns. If such evidence had been produced it would have confirmed that the development of 50 new homes would not result in unacceptable levels of congestion on Toms Lane or at the principal junctions at either end of the lane. It is also unclear why TRDC's concerns over highways matters do not extend to other sites proposed for allocation on Toms Lane, particularly Site H(2) which is seemingly unable to satisfy the necessary access standards for the size of development proposed.

Other Technical Assessments and Studies

In addition to the information discussed above in respect of transport issues, an extensive package of technical studies have been submitted to TRDC in support of earlier representations which confirm that Land West of 10 Toms Lane is deliverable and provide an illustration of the type of development which might occupy the site. The previously submitted information is listed below:

- Flood Risk and Drainage Technical Note – Millard Consulting – May 2009
- Noise Assessment – Millard Consulting – April 2009
- Phase 1 Environmental Risk Assessment – Millard Consulting – May 2009
- Ecological Assessment – Catherine Bickmore Associates – May 2009
- Archaeological Desk Based Assessment – CgMS – April 2009
- Service Report – Millard Consulting – June 2009
- Tree Survey – Catherine Bickmore Associates – May 2009
- Contextual Analysis and Option Study – Bidwells – September 2009

In the interests of completeness a copy of each of the documents listed above is enclosed. Further copies can be provided as required, either in paper or electronic format.

It is acknowledged that the enclosed reports are now more than two years old and that in some respects policy and legislation has moved on in the interim period. Nonetheless the reports listed, in combination with the Transport Statement discussed above, are sufficiently robust to provide compelling evidence to demonstrate that the site can be released for development without significant harm to the landscape and that there are no technical constraints (such as highways, drainage or utilities) or ecological features which would prevent the site from coming forward for development.

between now and 2021 and therefore housing delivery can reasonably be expected to be higher than set out in the housing trajectory as a result of these windfalls. Therefore it is not considered necessary to include a lapse rate allowance.

H084

The site 'Land West of 10 Toms Lane' was included as a potential housing site in consultation at the Core Strategy Preferred Options (2009), Core Strategy Further Preferred Options (2009) and, Site Allocations Preferred Options (2012) stages. It is acknowledged that the site performs reasonably well against the housing site selection criteria when compared to other Green Belt sites proposed for allocation, however as set out in Appendix 2 of the adopted Core Strategy, while performance against the criteria will inform the assessment of sites, the Council will consider each site on its merits and take into account site specific circumstances. In considering potential housing sites on 25 June 2012, the Council's Executive Committee considered that the site at Land West of 10 Toms Lane' should not be included as a potential housing site because of the impact on Green Belt resulting from development of this greenfield site and on traffic conditions on Toms Lane.

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The outcomes of this comprehensive technical assessment formed the basis for consideration of different site development options and culminated in the Contextual Analysis and Options Study (also enclosed).

The Contextual Analysis and Options Study identifies the preferred development option for the site of 20 detached and semi-detached houses to comprise a yet to be determined mix of 2-bedrooms through to 5-bedrooms. This shows strategic landscaping to the southern boundary of the site, planting reinforcement along the north and west boundaries, a balancing pond which will be managed as an ecological feature and new vehicular and pedestrian access.

In addition, The Wellcome Trust as landowner of the site and the remainder of the Kings Langley Estate have agreed to identify a corridor of land within their ownership along the eastern side of the rail line which will form a permissive path connecting the homes along Toms Lane with Kings Langley rail station and employment area. This permissive path will be more direct and hence it will improve accessibility to the train station and employment area for existing and future local residents and would therefore provide a significant benefit to the local population. Accordingly, there is no reason why the site should not be allocated for residential development so that it may immediately contribute to the supply of housing in the district.

It is not clear whether other sites which continue to be proposed for allocation are supported by a similarly comprehensive and compelling package of technical information which demonstrates deliverability. If this is not the case, then serious questions must be raised over the robustness of the SALDD, particularly in respect of sites such as 'Land at Three Acres' (Site H(2)) which seemingly has no deliverable means of access.

Conclusions

TRDC has not produced any evidence to justify the omission of Land West of 10 Toms Lane from the SALDD. It is not acceptable to base such decisions solely on a political preference to avoid the development of a particular site.

It has been demonstrated above that Land West of 10 Toms Lane is better suited to residential development than at least three sites which are proposed for allocation (Site H(2), Site H(17) and Site H(28)) and is also more sustainable than Site H(6) and Site H(10) in terms of accessibility to local services and amenities. The SALDD does not therefore represent the most appropriate strategy when considered against the reasonable alternatives and it is not based on proportionate evidence.

Furthermore, in proposing allocations which do not perform as well as Land West of 10 Toms Lane against a range of sustainability criteria, the SALDD is contrary to clear presumption in favour of sustainable development required by the National Planning Policy Framework. The SALDD should advocate and facilitate the most sustainable strategy for growth. This is not currently the case.

The Site Allocations document appears to makes no specific provision for healthcare facilities which in light of for example closure of various UCCs in County and other factors such as increasing nos. of older people generally within local communities has and will continue to place increasing pressure on existing already stretched resources at e.g. WGH &HHGH.

In this respect the Site Allocations document appears to be limited by the ambit of the adopted Core Strategy which does not seem to give health a high priority. Community Strategy Priorities 1- 5 make no reference to health. Strategic Objectives S1-S12 make only passing mention of provision of services and infrastructure to meet needs of existing and new development.PPS2 Development in Key Centres visualizes improved access to health care services in Mill End yet the Site Allocations document makes no specific provision for such a development. The document identifies South Oxhey as an area needing regeneration yet improved healthcare does not seem to be part of the overall package for this settlement.

The need for more intermediate care for older people is well recognised by various studies including the National Service Framework for Older People 2001 yet presumably because of the Core Strategy not specifically addressing health care needs these have not been translated into site allocations.

Seriously deprived areas such as Northwick do not appear to have been given special attention and appropriate site allocations to help meet urgent needs. The knock effect of this is increasing pressure on other adjacent areas.

The schedule of proposed allocations includes the redevelopment of primary school site for housing which in light of County Council strategy for increased secondary school provision on the face of it seems puzzling e.g. Little Furze School South Oxhey.

Several proposed housing allocations involve redevelopment in the Green Belt.

Whilst subject to certain provisos, such development can now be seen as not inappropriate; the larger scale developments of a no. of such sites in these locations may be unduly optimistic which could have implications for housing land supply.

West Herts Hospitals Trust would be interested in taking these matters further with the District Council

60103 West Hertfordshire Hospitals NHS Trust
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More focus on the healthcare needs of the district.

Comment noted. The Infrastructure Delivery Plan has been subject to consultation with the PCT. The plan has been informed by information from a range of County and District Council services, (such as education, libraries, highways etc), the Local Strategic Partnership and infrastructure providers. The provision of healthcare facilities would be addressed through the planning application process by S106 agreements and CIL in the future.

No change considered necessary.

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both informally and via the next stages in the preparation of this DPD.

WHHT's main concern is that this document fails to address healthcare needs of the District's population which in part appears to rest on the lack of attention given to this topic area by the Core Strategy.

With the increasing health care needs of the population nationally and locally, planning for health must to be done properly, positively and proactively and not as an after -thought reactive exercise to population /household growth and pressures.

The Core Strategy and Site Allocations DPD as planning tools should as the NPPF points out be creating a high quality built environment , with accessible local services that reflect the community's needs and support its health ,social and cultural well being.

It is questioned whether the Site Allocations DPD fully meets the requirements of the NPPF.

60251 Environment SA
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We are pleased that the sequential test has been carried out for those sites shown to be in flood risk areas, and that all residential sites have been removed from flood zones 3a and 3b.

We find all of the site allocations to be sound and legally compliant.

Biodiversity and Green Infrastructure

We are pleased that the requirement for an ecological survey has been identified for a number of the sites that may have an impact on sites of an ecological interest. However, we do feel that the comments on these sites H(3), H(24), H(26), H(27), H(28), H(33), H(36) and H(37)) could be made stronger to require a net gain in biodiversity, rather than just 'avoid adverse impacts'.

The National Planning Policy Framework (NPPF) gives clear guidance to local authorities about the importance of planning for the natural environment at a strategic scale. Some of the key sections from the NPPF state:

- the planning system should contribute to an enhance the natural and local environment by providing net gains in biodiversity where possible (paragraph 109);
 - local planning authorities (LPAs) should plan positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure (paragraph 114);
 - planning policies should minimise impacts on biodiversity (paragraph 117);
 - opportunities to incorporate biodiversity in and around developments should be encouraged (paragraph 118).
- Furthermore, your own Core Strategy Development Plan Document (DPD)(adopted) and Development Management DPD (at examination) provide further guidance on the expectations for developments and biodiversity, such that:
- development should protect and enhance natural environments from inappropriate development and improve the diversity of wildlife and habitats (Core Strategy policy CP1);
 - the council will seek a net gain in Green Infrastructure, particularly focusing on conserving and enhancing watercourse corridors, the Colne Valley Park, and the District's key wildlife sites (Core Strategy policy CP9);
 - the design of development should conserve and enhance natural assets and build resilience into the site's design taking climate change into account (Core Strategy policy CP12);
 - proposals should incorporate measures for biodiversity enhancement and Green Infrastructure delivery (Development Management policy DM06);
 - protect habitats, provide compensation for loss of habitats, maintain the integrity of networks of natural habitats and enhance existing habitats and networks (Development Management policy DM06);
 - development must not result in fragmentation or isolation of wildlife habitats and should seek opportunities for habitat connectivity with the wider landscape (Development Management policy DM06).

A good proportion of the sites are in potentially sensitive locations close to river and canal corridors, as well as nationally and locally designated wildlife or habitat sites. It is crucial that as development proposals are brought forward for these sites, biodiversity is considered from the offset. Many of these sites will offer a once-in-a-lifetime opportunity to improve the green linkages between sites and with the wider landscape and to provide an overall net gain in biodiversity.

Buffer zones

We are pleased that all residential sites adjacent to watercourses have identified the requirement for a 5 metre (m) or 8m buffer zone. We would also request that this requirement is added to the comments section for the proposed employment sites adjacent to watercourses. We have identified these sites in our site specific comments.

The comments on these sites H(3), H(24), H(26), H(27), H(28), H(33), H(36) and H(37)) could be made stronger to require a net gain in biodiversity, rather than just 'avoid adverse impacts'.

Strongly recommend that a paragraph is included in the introduction to the document, or the accompanying text to each relevant site, indicating what a buffer zone is.

Strongly recommend that you mention in the introductory text that the use of SuDS will be expected for all development sites.

Highly recommend that the requirement for preliminary risk assessments is added to the comments box for the sites where this is the case.

No further detail on buffer zones is considered necessary as further guidance is available elsewhere.

It is not considered necessary to mention that the use of SuDS will be expected for all development sites as this is referred to in Policy CP1 of the Core Strategy (adopted October 2011).

The following alterations are proposed:

Amend Site H(3) Comments to 'Part of the site (north of Masters Yard) is identified as a wildlife site. Measures to avoid adverse impacts **and enhance biodiversity** will need to be provided by developers, supported by adequate ecological survey '.

Amend Site H(24) Comments to 'Site near to wildlife site. Measures to avoid adverse impacts **and enhance biodiversity** will need to be provided by developers, supported by adequate ecological survey '.

Amend Site H(26) Comments to 'Site near to wildlife site. Measures to avoid adverse impacts **and enhance biodiversity** will need to be provided by developers, supported by adequate ecological survey '.

Amend Site H(27) Comments to 'Site near to wildlife site. Measures to avoid adverse impacts **and enhance biodiversity** will need to be provided by developers, supported by adequate ecological survey '.

Amend Site H(28) Comments to 'Site includes area of wildlife site. Measures to avoid adverse impacts **and enhance biodiversity** will need to be provided by developers, supported by adequate ecological survey '.

Amend Site H(33) Comments to 'Site adjacent to wildlife site. Measures to avoid adverse impacts **and enhance biodiversity** will need to be provided by developers, supported by adequate ecological survey '.

Amend Site H(36) Comments to 'Site adjacent to wildlife site. Measures to avoid adverse impacts **and enhance biodiversity** will need to be provided by developers, supported by adequate ecological survey '.

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Amend Site H(24) Comments to 'Site near to wildlife site. Measures to avoid adverse impacts **and enhance biodiversity** will need to be provided by developers, supported by adequate ecological survey '.

Amend Site H(26) Comments to 'Site near to wildlife site. Measures to avoid adverse impacts **and enhance biodiversity** will need to be provided by developers, supported by adequate ecological survey '.

Amend Site H(27) Comments to 'Site near to wildlife site. Measures to avoid adverse impacts **and enhance biodiversity** will need to be provided by developers, supported by adequate ecological survey '.

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However, we are concerned that the term 'buffer zone' has not been described in the document, so this may lead to confusion for developers on what the requirements are for them.

We would strongly recommend that you either include a paragraph in the introduction to the document, or add accompanying text to each relevant site, indicating that a buffer zone is expected to be:

- free of all built development, including roads, paths, fences and structures;
- only planted with locally appropriate, native flora species;
- naturalised where possible.

Naturalised, undeveloped buffer zones planted with native species will help to provide net gains for biodiversity, improve Green Infrastructure, help Three Rivers District Council (TRDC) to improve the ecological state of watercourses as required by the Water Framework Directive, and allow space for the rivers to flood and flow naturally.

Sustainable Drainage Systems (SuDS), water quality and water efficiency

We appreciate that the comments sections of the site allocations are for the principal issues and specific requirements for each site. As such, details of expectations for the use of SuDS to improve water quality and efficiency at each site is unrealistic.

However, we would strongly recommend that you mention in the introductory text that the use of SuDS will be expected for all development sites.

This will help to improve water quality, having a positive impact on the District's watercourses and groundwater resources.

The use of water efficiency techniques, such as greywater recycling and water efficient appliances, should also be an expectation (or recommendation) for all development sites. TRDC has amongst the highest water usage levels in the country, whilst also having some of the most sensitive and over-abstracted groundwater resources. The average resident of TRDC uses approximately 170 litres per day (l/d), well above the Building Regulations target of 125 l/d, and the Code for Sustainable Homes target that we promote in this region of 105 l/d.

With the effects of climate change and population pressures in the future, water efficiency is going to become an even more crucial issue in Three Rivers. You should be making clear to developers at an early stage that you will expect the highest water efficiency standards for all developments.

Land contamination

In our response to the pre-submission version of this document, we indicated that a number of sites are known to or likely to suffer from land contamination due to current or previous land uses. We know that a Preliminary Risk Assessment (PRA) will be required for applications on these sites. As such, we highly recommend that this requirement is added to the comments box for the sites where this is the case.

We have indicated on the site specific comments where we know that a PRA would be required and the reason why.

The groundwater and chalk aquifers in Three Rivers are highly sensitive to groundwater pollutants. National and local policies give clear guidance that where land contamination is known or suspected, adequate investigation and remediation should be carried out such that the sensitive groundwater is not put at risk.

Amend Site H(37) Comments to 'Site adjacent to wildlife site. Measures to avoid adverse impacts and enhance biodiversity will need to be provided by developers, supported by adequate ecological survey'.

It is not considered appropriate to include the suggested paragraph about buffer zones in the document because the detailed impact of future development would be assessed through the planning application process.

Policy CP1 of the Core Strategy states that all development should take into the account the need to minimise flood risk through the use of Sustainable Drainage Systems.

All of the relevant Comments section for Sites H(3), H(7), H(9), H(12), H(13), H(14), H(16), H(19), H(24), H(25), H(26), H(27), E(a) and E(d) to be amended to include the requirement for a preliminary risk assessment.

Site H(3) Comments to include 'A number of waste sites are located to the north of the site. Parts of the site are in Source Protection Zones 1 and 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(7) to include 'The site lies within Source Protection Zone 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(9) to include 'The site lies within Source Protection Zone 3. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(12) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(13) to include 'The site lies within Source Protection Zone 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(14) to include 'The whole site is located above a principal aquifer (chalk), which is highly sensitive to contamination. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(16) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

biodiversity will need to be provided by developers, supported by adequate ecological survey'.

Amend Site H(28) Comments to 'Site includes area of wildlife site. Measures to avoid adverse impacts and enhance biodiversity will need to be provided by developers, supported by adequate ecological survey'.

Amend Site H(33) Comments to 'Site adjacent to wildlife site. Measures to avoid adverse impacts and enhance biodiversity will need to be provided by developers, supported by adequate ecological survey'.

Amend Site H(36) Comments to 'Site adjacent to wildlife site. Measures to avoid adverse impacts and enhance biodiversity will need to be provided by developers, supported by adequate ecological survey'.

Amend Site H(37) Comments to 'Site adjacent to wildlife site. Measures to avoid adverse impacts and enhance biodiversity will need to be provided by developers, supported by adequate ecological survey'.

Site H(3) Comments to include 'A number of waste sites are located to the north of the site.'

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Site H(19) to include 'The site lies within Source Protection Zone 3. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(24) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(25) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(26) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(27) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site E(a) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site E(d) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Parts of the site are in Source Protection Zones 1 and 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(7) to include 'The site lies within Source Protection Zone 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(9) to include 'The site lies within Source Protection Zone 3. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(12) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

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Site H(13) to include 'The site lies within Source Protection Zone 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(14) to include 'The whole site is located above a principal aquifer (chalk), which is highly sensitive to contamination. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(16) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(19) to include 'The site lies within Source Protection Zone 3. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be

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undertaken would be required to support planning applications on the site.'

Site H(24) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(25) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(26) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site H(27) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works

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60020 /3001 1/SA/1	Barclays Bank SA	<p>Barclays support the promotion of South Oxhey District Centre as a Key Centre within Three Rivers and strongly support the delivery of regeneration benefits to South Oxhey. Barclays are strongly committed to maintaining their presence within the regenerated Town Centre in order to contribute to these goals.</p>	<p>Barclays formally request that greater clarity is provided so that the Three Rivers Submission Policies Map (November 2012)</p>	<p>It is not considered necessary to make the recommended changes because the frontages relate to Policy SA4 which sets out the uses considered appropriate within the frontages.</p>	<p>No change considered necessary.</p>
		<p>Barclays support the "Housing Site Allocation", "Primary Frontage Allocation" and "Secondary Frontage Allocation" shown on the Three Rivers Submission Policies Map (November 2012) – Map 4. We reiterate our comments stated above in relation to each, but consider that these labels should be amended to reflect the amendments to site plan ref. R(b) and the Land Use Plan (page 66) for consistency.</p>	<p>– Map 4 correlates with the suggested alterations to site plan ref. R(b) and the Land Use Plan (page 66). This will provide consistency across all three plans and flexibility to ensure that bank uses will be supported and provided within the redevelopment of South Oxhey Town Centre, either on the same site or elsewhere in the centre.</p>	<p>The land use plan has been produced to guide amounts of different uses to be provided in the centre and where these would be located. Given that these are guidelines it is not considered appropriate to include these on the Policies map.</p>	
			<p>Barclays request that the following alterations are made to the key to Three Rivers Submission Policies Map (November 2012) – Map 4: "Primary Frontage: Retail and Supporting Services Allocation" and "Secondary Frontage: Retail and Supporting Services Allocation".</p>		
			<p>We also consider that the relevant areas of South Oxhey should be colour coded on the Three Rivers Submission Policies Map (November 2012) – Map 4 for mixed use to correlate with the Land Use Plan (page 66).</p>		
			<p>This will ensure that the plan is positively prepared, justified, effective and thus sound.</p>		

will need to be undertaken would be required to support planning applications on the site.'

Site E(a) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

Site E(d) to include 'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'

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60036 /3002 0/SA/2	Natural England	SA	<p>We are pleased that the document has been revised to address some of our previous comments. We believe a number of outstanding comments need to be addressed to provide further clarity; these are as follows:</p> <p>We note that a number of designated wildlife sites (Local wildlife sites and Local Nature Reserves) fall on/in close proximity to some of the allocated sites. It should be re-iterated within the SAPD that where designated sites occur on/close to an allocated site (and in accordance with Development Management Policy 6- DM6) proposals will need to demonstrate that development will not have adverse effects and opportunities for ecological management, enhancement and restoration will be sought.</p> <p>Similarly, relevant proposals will need to be subject to ecological surveys and appropriate mitigation/enhancement measures where development could potentially impact upon a species protected under European or statutory legislation or which could impact upon UK or Local BAP habitats or species.</p> <p>Some of the allocated sites occur on previously developed land/brownfield sites. As mentioned in Core Strategic Objective 2 of the Core Strategy brownfield sites can often be constrained by biodiversity interests. We would suggest that this is also highlighted within the SAPD.</p>	Document amended to include reference to the impact development could have on Local Wildlife Sites, Local Nature Reserves and biodiversity.	Paragraph 3.4 sets out that 'all development will be assessed in accordance with planning policy in the NPPF, the Core Strategy and Development Management Policies Documents and any subsequent local plan documents. It is not necessary to repeat the detail of these policies in the site allocations document.	No change considered necessary.
60180 /3004 6/SA/C	M Hosking	SA	<p>Consultation on the Plan has not been fully effective, mainly as a result of Rickmansworth not having a Local Parish Council or Neighbourhood Forum to act as a conduit to residents. The result is that many people have no idea of the impact these proposals will have on the area they live in. I would like to propose that the consultation period for the Plan is extended so alternative options can be considered in conjunction with the soon to be formed Neighbourhood Forum (assuming it is given the go-ahead by TRDC).</p>	Consultation period of the document extended.	<p>The Council has sought submission of potential sites for consideration for housing, employment etc since 2008.</p> <p>Planning applications would be submitted to determine whether the proposed development is in accordance with the relevant planning policies of the Local Plan.</p>	No change considered necessary.
60229 /3005 4/SA/1	Mr J Webb	SA	<p>Because the Council ignored the 22 of 91 which states all Councils should consider the needs of travelling showpeople when preparing local plans. 20 years old.</p> <p>Housing needs assessment for showmen. To be allocated by 2011 has come and gone nothing allocated under Local Housing Act 225 Section 3 Council accept large numbers of showmen living in Three Rivers for over 50 years and travelling in the area with a need but no allocation in this document.</p>	Showmen should have been included in housing allocations as green sites are being allocated for other uses.	The Council are currently in the process of producing a Gypsy, Traveller and Travelling Showpeople LDD, which is a document that will identify sites to meet the accommodation needs for Gypsies, Travellers and Travelling Showpeople in the District in accordance with national policy.	No change considered necessary.

1.0 Introduction

2.0 Local Plan Policy Context

3.0 Presumption in Favour of Sustainable Development

60108 /3002 7/3.1/ 1	WD3 School Action Group	3.1	<p>The WD3 School Action Group (WD3SAG) notes Three Rivers District Council's (TRDC) statement that "It will always work with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area." It has answered "No" in reply to the questions above because although it understands that the inclusion of this statement should render the answer to the 5 questions as the affirmative, it does not truly expect TRDC to be able to behave in line with this statement because of the word "always".</p> <p>TRDC Councillors and officers have on occasion been very good at working jointly with the WD3SAG by providing information about proposed local development (e.g. details about the hotel development proposed behind Hertford Place, Councillor and officer presence and presentations at WD3SAG public meetings, etc.). The WD3SAG has greatly appreciated this joint working and supportive collaboration from TRDC. However, there have also been other occasions when this has not been the WD3SAG's experience of TRDC. The WD3SAG has asked Councillors several times to be given permission to work with Council officers with access to TRDC land data to determine what areas could be developed for Secondary School purposes - evidently with a possible view to making an application itself or arming itself with information for use by the County Council as part of an application to provide the local educational infrastructure that TRDC, the County Council, WD3SAG and other local community representatives agree is needed. On each occasion, the Councillors approached have seemed to duck this request by finding reasons why such a meeting should not happen. Thus, the WD3SAG questions if this TRDC can genuinely behave in the manner represented by the absoluteness of the statement (i.e. "always").</p> <p>It is unclear from the possible ambiguity of the statement if the purpose behind the use of the phrase "wherever possible" is to address the 'approval of applications' or 'TRDC's efforts to always work jointly with applicants'. If the use of this phrase is intended for the second purpose, the uncertainty is already inherent in the word "can" (used instead of "will"), and so the "wherever possible" simply reinforces the uncertainty - the phrase is not actually needed to provide the intended meaning. Thus, it is better to</p>	<p>Section 3.1 should read instead: Wherever possible, it will work with applicants jointly to find solutions which mean that proposals can be approved, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Section 12.7, Policy SA9 should read instead: Regular monitoring will assess: a) How many applicants or potential applicants register (dis)satisfaction with TRDC willingness to work with them to find development proposal solutions; and b) Progress on individual sites against capacity and phasing information set out in the Site Allocations document.</p>	<p>Paragraph 3.1 is taken from the PINS model policy and is therefore not considered appropriate to amend.</p> <p>While applicants/ potential applicants registering '(dis)satisfaction with TRDC willingness to work with them to find development proposal solutions' will be kept under review it will not be possible to formally monitor this.</p>	No change considered necessary.
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use this phrase at the start of the sentence so that it covers both parts of the following phrase/wording and serves to cover both purposes.

60113 /3003 0/3.1/ 3	New Gospel Halls Trust	3.1	<p>New Gospel Hall Trust is a charitable ecclesiastical trust responsible for the provision and maintenance of Gospel Halls for the Plymouth Brethren Christian Church in the Watford area, including adjoining districts where the congregation reside. The Trust has engaged in an ongoing search for new gospel halls in the area.</p> <p>The Trust are therefore concerned to ensure that the Site Allocations DPD is fully aligned with the NPPF. In particular, the Trust is concerned at the weight to be given to the general presumption in favour of sustainable development and the linkage to the NPPF which explicitly recognises the need for places of worship (NPPF paragraphs 28, 70 and 171).</p> <p>The Trust welcomes the inclusion of the 'model policy' in the text at paragraphs 3.1 and 3.2 but considers that these should take the form of policy to ensure effectiveness and consistency with national policy.</p>	<p>Upgrade paragraphs 3.1 and 3.2 to policy status, with appropriate minor changes to text to reflect this modification.</p> <p>NOTE: It is considered that as the text already is set out in the Submission Draft this will not amount to a Main Modification.</p>	<p>Comment noted. The presumption in favour of sustainable development is a national planning policy and while the text has been included in the site allocations document as recommended by the PINS model policy it is not considered necessary for paragraphs 3.1 and 3.2 to be specifically identified as a local policy.</p>	<p>No change considered necessary.</p>
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4.0 Housing Site Allocations

60184 /3005 0/4.1/ S	Thames Water Utilities Ltd	4.1	<p>We support the reference to Policy CP8 of the Core Strategy. With regard to the housing sites within the document there are a number of sites where we have concerns about the capacity of the existing sewerage infrastructure network and the potential impacts of the development.</p> <p>In accordance with Policy CP8 of the Core Strategy and the text in section 5.81 of the Core Strategy developers should either demonstrate that capacity exists both on and off site or that additional capacity can be provided in time to serve the development and that it would not lead to problems for existing or new users. Where sewers cross proposed development sites developers will need to ensure that a minimum distance of three metres is retained between the new development and the existing assets.</p> <p>Our current comments on individual sites, based on the information available, are summarised in the attached table.</p> <p>At a more strategic level there are potential network constraints across the catchment and potential issues with the ability to treat flows at the existing sewage treatment works as highlighted in the previous stage 1 scoping water cycle study. The district of Three Rivers is served by Maple Lodge STW which also serves Watford, Dacorum, Chiltern, Hertsmere, Welwyn and Hatfield and St Albans and so their growth plans also need to be taken into consideration when planning infrastructure.</p> <p>The Works treats a flow from a population equivalent (PE) of just under 500,000. PE flows are made up of trade, commercial, residential and other discharges.</p> <p>Thames Water recommends that this study is revisited by the all boroughs served by the works to show that sewerage infrastructure will not be a significant constraint to growth in the future.</p> <p>Upgrades to our infrastructure should be anticipated their exact scale and location will be determined by the exact location scale and phasing of development. The time to deliver infra should not be underestimated. It can take 18 months - 3 years for local upgrades and 3 - 5 years for more strategic ones from a point of certainty about development occurring.</p> <p>We would welcome the councils support in securing infra upgrades by placing suitably worded Grampian planning conditions on development site planning approvals where off site upgrades are required or suspected.</p>	No change required.	Support welcomed.	No change required.
Policy SA1: Housing Site Allocations						
60012 /3000 8/SA1/ S	Highways Agency	SA1	The Agency supports SA1 relating to Housing Site Allocations	n/a	Support welcomed.	No change required.
60105/ 30026/ SA1/2	Gade Investments	SA 1	<p>The comment in the policy that 'Sites should be developed at an overall capacity which accords generally with the dwelling capacity given for that site.' is an unnecessary restriction on capacity and could constrain and undermine the housing land supply. It should state minimum, but as in the case of other authorities is to be seen as a flexible guide to the capacity - if it is exceeded through specific planning application proposals then so much the better as by definition it will have been found to be acceptable from a DM perspective.</p>	<p>Take out 'Sites should be developed at an overall capacity which accords generally with the dwelling capacity given for that site'</p> <p>and substitute with</p> <p>'The capacity shown for allocated sites is considered a guide and can be increased subject to compliance with other development management policies of the plan'</p>		No change considered necessary.

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6026 Taylor
0/300 Wimpey
58/SA
1/1

SA
1

Do you support this policy?

2.1 No

Comments

2.2 We object to the housing numbers proposed to be delivered via the SADPD. These have been carried over from the Core Strategy. The housing numbers are out of date and are not therefore adequate, up-to-date and relevant as the basis for plan preparation (NPPF paragraph 158 refers). A summary of the approach that should be applied to the preparation of a Local Plan are best explained in the three tests that the Plan must pass as set out in paragraph 182 of the NPPF. These tests which the Inspector must apply during the examinations are:

- whether the plan has been prepared in accordance with the Duty to cooperate;
- whether the plan meets the legal and procedural requirements; and
- whether the plan is sound.

2.3 A "sound" local plan is one which is:

- positively prepared- the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- justified- the plan should be the most appropriate strategy, when considering against the reasonable alternatives, based on proportionate evidence;
- effective – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities;
- consistent with national policy- the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

Delivering sustainable development: Delivering a wide choice of high quality homes

2.4 In the chapter "Achieving sustainable development" the Government clearly states that in order to achieve this objective there is a need to deliver a wide choice of high quality homes. Paragraph 47 requires local authorities to significantly boost the supply of housing. To do this local planning authorities are required to use their evidence base to ensure that their Local Plan meets the full, objectively assessed need for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this NPPF, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.

2.5 In paragraph 50 Councils are required to deliver a wider choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities. To achieve this, Government states that local planning authorities should plan for a mix of housing based on current and future demographic trends, market trends and also identify the size, type, tenure and range of housing this is required in particular locations, reflecting local demand.

Preparation of a local plan

2.6 In addition to the above, paragraph 151 of the NPPF requires that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development and includes the presumption in favour of sustainable development.

2.7 In terms of sustainable development local authorities have in the past simply chosen not to accommodate much needed development due to the impact on one of the measures of sustainable development. The NPPF at paragraph 152 does not condone this approach but requires that the LPAs seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. The NPPF requires that significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

2.8 Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate. In summary therefore the NPPF does not allow for the needs of the present (such as housing) to go unmet, but requires the LPAs to establish a way of making this provision, if required, by ensuring that there is mitigation and/or appropriate compensation if necessary.

2.9 Paragraph 154 requires the Local Plans should be aspirational but realistic. They

The Council has considered available evidence both on the need for housing in the District and the capacity of the District to accommodate this need. The Core Strategy was subject to Examination and sets out the target for new housing to be provided in Three Rivers. The Core Strategy was adopted in 2011 following examination. The Site Allocations document has been prepared in accordance with this and therefore it is not considered necessary or appropriate to repeat information on how the housing target has been derived within the Site Allocations document.

No change
considered
necessary.

Sustainable Development

Sustainable development is a key principle underpinning the Core Strategy and is critical to the delivery of many of the Council's and community's aspirations. The Site Allocations document has been subject to a Sustainability Appraisal and a Strategic Environmental Assessment to test the document throughout the process in terms of its environmental, economic and social impact.

Duty to Cooperate

The Site Allocations document has been produced on the basis of cooperative working with a range of organisations. The Council has cooperated across district boundaries, with other Hertfordshire authorities including the County Council and with other organisations. Where there are clear strategic and cross boundary issues we have undertaken the evidence base studies jointly with other authorities and organisations such as the South West Hertfordshire Strategic Housing Land Availability Assessment (2008). The Council will continue to constructively and actively engage with all the relevant bodies as part of the plan preparation process.

Delivery of Housing Allocations

Affordable housing is dealt with in the Core Strategy. Policy CP4 of the Core Strategy states that the Council will seek an overall provision of 45% of all new housing as affordable housing, incorporating a mix of tenures. All new development resulting in a net gain of one or more dwellings will be expected to contribute to the provision of affordable housing. In cases where the applicant considers that the provision of affordable housing would impact on the viability of a development, the onus is on the developer to submit evidence of non viability in the form of a financial appraisal submitted at the time of the application.

It should be noted that the policy provides an indicative capacity for each housing site.

Woodside Road

Whilst the overall score of the site is acknowledged, as set out in Appendix 2 of the adopted Core Strategy 'whilst the criteria and score of how well a site performs in relation to the range of planning and sustainability criteria will inform the Council's decision on the site, in coming to a final decision the Council will consider each site on its merits and take into account site specific circumstances. It may not be the case that higher scoring sites will automatically be taken forward and that lower scoring sites will not be taken forward'.

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should address the spatial implications of economic, social and environmental change. NPPF (paragraph 156) requires Local Plans to include strategic policies which deliver:

- the provision of homes and jobs needed in the area
- the provision of retail, leisure and other commercial development;
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
- the provision of health, security, community and cultural infrastructure and other local facilities;
- climate change mitigation and adaptation, conservation and enhancements of the natural and historic environment, including landscape.

2.10 Local Plans are also required to be based on co-operation with neighbouring authorities, public, voluntary and private sector organisations. Using a proportionate evidence base

2.11 Local Plans are required to be based on adequate, up-to-date and relevant evidence, to ensure that their assessment of, and strategies for, housing, employment and other uses are integrated and that they take full account of relevant market and economic signals (paragraph 158).

2.12 In terms of the evidence base for housing, planning authorities should:
- prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of ten o meets household and population projections, taking account of mitigation and demographic change;

- addresses the need for all types of housing, including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and caters for housing demand and the scale of housing supply necessary to meet this demand.

- Prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, sustainability and the likely economic viability of land to meet the identified need for housing over the plan period.

The duty to cooperate and plan strategically across local boundaries

2.13 The duty for local authorities to cooperate on planning issues is a statutory responsibility. Paragraph 178 of the NPPF sets out how this is to be achieved. This states that public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities set out in paragraph 156, including housing and migration. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities.

2.14 It is also very clear that the Government considers that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas – for instance, because of a lack of physical capacity or because to do so would cause significant harm to the principles and policies of the NPPF. As part of this process, they should consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans (paragraph 179).

2.15 The need to take account of wider areas is explicit in paragraph 180 of the NPPF and includes the need to consider travel-to-work areas.

2.16 Paragraph 181 requires a trail of evidence to demonstrate evidence of effective cooperation to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This evidence can consist of: preparation of plans or policies by a joint committee;

- a memorandum of understanding;
- or a jointly prepared strategy which is presented as evidence of an agreed position.

2.17 The Government expects that cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support

In relation to the Woodside Road site with a dwelling capacity of 100 and also a primary school, this site is a greenfield and green Belt site which the Council considers is likely to have a significant adverse impact on the Green Belt in this area. The Council also has concerns about access to the site and traffic in the area particularly given the proximity to three schools already in the area. Therefore, the Council do not consider that the site should be allocated for housing and a primary school.

As the primary school element would not be deliverable without the housing allocation, the site has not been included as a primary school allocation.

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current and projected future levels of development.

2.18 Local Plans cannot proceed until the implications of the neighbouring authorities' policies have been appropriately modelled and, in a clear unambiguous agreement with the authorities concerned, a strategy is developed that takes into account the likely future impact of these adopted policies.

2.19 Such an agreement might include the commitment by other authorities for an early review of recently adopted policies so that they can be brought into conformity with this legal requirement.

Conclusions on approach to housing provision

2.20 The Core Strategy was adopted prior to the publication of the NPPF. The NPPF does not allow for plans dealing with housing allocations to refer back to anything other than an up-to-date SHMA or other evidence base. The LPA must reassess housing provision.

2.21 Furthermore, there is no documented evidence of how the Council has complied with the Duty to Co-operate. Arising from the need to establish a suitable evidence base, the Duty to Co-operate would require that the Authority has regard to the provisions and requirements of Plans in adjoining and other areas, particularly in regard to cross boundary provisions such as education.

Delivery of Housing Allocations

2.22 Explanations into how the Council have arrived at their dwelling capacities for each of the proposed site allocations within the evidence base are unclear, and none appear to be included within the DPD itself. The SHLAA Update 2010 states at section 3.6 that for sites of less than 5 hectares, case studies from the Urban Capacity Study (UCS) 2005, compared to density levels of planning permissions granted in the study area since the UCS was published have provided a sample range of different types of development opportunity in a range of locations.

2.23 The majority of proposed site allocations are less than 5 hectares and it is assumed that their dwelling capacity has been calculated using this approach. This ambiguous explanation is made no clearer following a review of the UCS and has resulted in several sites being assigned dwelling yields which are excessively high, unlikely to be realistically capable of being delivered and which, even were they to be achievable, would not complement or integrate with the local area. These sites' dwelling capacities are not justified and many sites are assigned development which would fail to respond to and respect the character of its surroundings. The DPD is not consistent with national policy, artificially inflates the assumptions of delivery and is therefore unsound.

2.24 There are further implications arising from the large number of small PDL sites proposed for allocation. Although the Core Strategy at Policy CP4 „Affordable Housing" sets a low threshold for developments which must provide affordable housing, it allows for developments below 10 dwellings to provide commuted payments for off-site provision. A number of proposed allocations have dwelling capacities below 10 dwellings and it is considered that further proposed allocations would, in reality, deliver fewer than 10 dwellings. The capacities of the majority of remaining sites are not much greater and as such, a requirement for 45% affordable housing on-site would make many unviable and therefore undeliverable. These sites cannot be relied upon to provide the affordable housing that the Core Strategy recognises is a priority for the area and as such, the DPD is not in conformity with the strategies set out within the

Core Strategy.

2.25 We object to the omission of Woodside Road, Abbots Langley (with associated provisions for the construction of a primary school on site) from the Pre-Submission DPD and would request the site be included as an allocation within the document. The inclusion of the whole site extending to High Elms Lane, as outlined in Appendix 1, would provide a new high quality development with an opportunity to provide a significant area of new public open space / green infrastructure, linking to existing Local Plan open space designations and therefore with the potential to provide an ecologically important „green corridor". We consider the site to be better suited to providing a sustainable and accessible development as part of a natural extension to the urban area than the alternative sites on greenfield land currently retained or recently added by the Council (which account for approximately 42 hectares of Green Belt land in total).

2.26 There is an over-reliance on allocations of smaller PDL sites within the Pre-Submission DPD. The site at Woodside Road is available and deliverable in the short term and would make a reasonable contribution to the housing requirements of the Core

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Strategy, while clearly being able to offer the benefits of a larger scale development, such as affordable housing, land for community needs and the realistic provision of a new primary school.

2.27 Land at Woodside Road, Abbots Langley has been scored by the Council using their methodology contained at Appendix 2 of the adopted Core Strategy. The breakdown of this scoring is contained in the Site Allocations Proposed Submission November 2012 Housing Site Scores document. The site's score is greater than the scores of 25 of the 38 sites proposed for allocation; it scores higher than more than 65% of the proposed allocated sites.

2.28 We do not however agree with the scoring of the Woodside Road site, with several scores completely contrary to assessments made by the Council themselves during earlier consultations on the site, as well as assessments made by Taylor Wimpey. Impact on the Green Belt is concerned with potential encroachment into the Green Belt and coalescence of settlements. The residential land parcel at Woodside Road abuts existing housing to the south and west, with further residential areas to the east, beyond existing scrubland. A Landscape and Visual Appraisal (June 2011) of the site concludes that built development would fall within the surrounding visual context of these residential areas and due to this visual containment, the site "does not play a significant role in the „openness" of the Green Belt". Further, the appraisal concludes that high quality housing and a primary school abutting the urban edge which would be framed and enclosed by mature hedges and trees would not give rise to a significant effect on the character of the Green Belt. When compared to sites that scored higher for GB Impact, such as East of Summerhouse Way, Abbots Langley and East of Jacketts Field, Abbots Langley, it is clear that Woodside Road should have scored at least 6, giving the site a score of 30 within this column, taking into account the multiplication factor of 5.

2.29 The site has been given a score of 3 for „wildlife site", presumably due to the fact that it is within 1km of a local wildlife site. This wildlife site, which forms part of the grounds of a private estate, has not been recorded as supporting any protected species. An extended Phase 1 Habitat and Protected Species Report (February 2011) for Woodside Road concludes that the presence of broadleaved woodland and scrubland between the two sites means that proposed development works should not affect the habitats present within the designated wildlife site. A score of 3 out of 10 is considered unreasonable therefore; a modest score of 5 out of 10 would be more appropriate, giving the site a score of 15 within this column, taking into account the multiplication factor of 3.

2.30 The site scores 2 for „listed building", presumably due to the fact that it is within 1km of two Grade II Listed Buildings. The Heritage Assessment (June 2011) produced on behalf of Taylor Wimpey concludes that development on the site would not lie within the setting of any designated heritage assets and that the visual impact of the development will not significantly intrude into any settings, or adversely affect the significance of any such assets. A score of 2 out of 10 is considered wholly unreasonable therefore; taking into account other site scores, a modest score of 4 out of 10 would be more appropriate, giving the site a score of 16 within this column, considering the multiplication factor of 4.

2.31 The Council has assessed the impact on Historic Landscape Character and it is not clear how they have arrived at their scores, but the scoring methodology does state that sites of „built up modern" character will score highest. Considering the points set out above in paragraph 2.12, a score of 2 out of 10 for the site is considered wholly unreasonable; a score of 5 would be more appropriate (multiplication factor is only 1 for this criterion).

2.32 Extensive work has been undertaken on the site's sustainability and accessibility credentials, with a Transport Strategy Report (January 2011) providing details on distances to local services and facilities. This assessment of accessibility shows the site is in compliance with the Institute for Highways and Transportation (IHT) Guidelines for Providing Journeys on Foot (2000). The site is approximately 400m from Tesco Express, 400m from Leavesden Pharmacy and 400m from the nearest takeaway restaurant. The Council's own assessment of the site, as detailed in Appendix 4 „Larger Housing Sites" of the Core Strategy Preferred Options Document states that "the site scores well in relation to local shops". For the site to then score 0 for „local shops" is bewildering; a modest score of 5 should be applied against this criterion, giving the site a score of 15 within this column, taking into account the multiplication factor of 3.

2.33 The site scores 9 for „primary school", the reason for which is unclear given that a primary school would be provided on-site; a score of 10 against the criterion should be given, giving the site a score of 30 taking account the assessment. These revised scores are not

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excessive and reasonably reflect the site's development credentials. Whilst it may be the case that other sites would score differently when assessed rigorously, it is clear that the site at Woodside Road should have a notably higher score and would undoubtedly move up the site score ranking in Housing Site Scores published with the draft DPD. The revised score for the site has been calculated as 926, meaning that, if no other site scores were to change, only 2 of the 38 sites proposed for allocation score higher; it scores higher than almost 95% of the proposed allocated sites. It is clear therefore that the Site Allocations Pre-Submission DPD does not provide the most appropriate strategy when considered against the reasonable alternatives and is therefore not justified.

2.34 The revised scores set out above have been justified through the robust site assessments produced by Taylor Wimpey and through the Council's previous consultations, as well as comparing the site and its scores with other sites included in given, giving the site a score of 30 taking account the multiplication factor of 3. It is noted that the site scored 10 in the January 2012 scoring, and the change in scoring now is unclear and inconsistent. Applying the same rationale, a score of 10 (30 with a multiplication factor of 3) should be given against the „children's play" criterion as the Masterplan for the site also includes an equipped area of play and natural area of play within the housing land parcel, as well as further opportunities for community uses within the remainder of the site. Whereas smaller PDL sites do not have the ability to offer such benefits, it should be recognised that Woodside Road does.

2.35 The provision of a primary school on the site provides an additional significant benefit to development of the site and multiplication factor of 3. It is noted that the site scored 10 in the January 2012 scoring, and the change in scoring now is unclear and inconsistent. Applying the same rationale, a score of 10 (30 with a multiplication factor of 3) should be given against the „children's play" criterion as the Masterplan for the site also includes an equipped area of play and natural area of play within the housing land parcel, as well as further opportunities for community uses within the remainder of the site. Whereas smaller PDL sites do not have the ability to offer such benefits, it should be recognised that Woodside Road does.

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SA 1 The housing sites allocation follows detailed research and evaluation of a wide number of sites, including via the Strategic Housing Land Availability Assessment and sustainability appraisal of the Site Allocations LDD (based upon the site selection criteria set out in Appendix 2 of the Core Strategy). The proposed sites included in the Site Allocations LDD have been the subject of detailed evaluation, including a Sustainability Appraisal against a list of criteria.

This submission is made in respect of land to the rear of 59-99 Ebury Road, Rickmansworth. This site has not been referred to or included in any of the Council's previous work on the site allocations. The site is under single private ownership and has recently been brought to the open market. This has triggered commercial interest in the site and the Development Plan process for the first time.

The objection raised relates to the suitability of the site for inclusion in the Site Allocations LDD and the fact that it is more suitable for allocation for development than some other sites included in the Preferred Options SA LDD.

The site extends to approximately 0.3 hectares and currently comprises rough grassland. A site plan is attached to this submission for clarification purposes. The site is currently covered by Green Belt designation and adjoins the Conservation Area. Importantly, the site lies close to the main town centre of Rickmansworth (the largest settlement in the District), which offers a wide range of shops, services and facilities. Access to the site could taken via either the Goral Mead garages to the east, or via No. 85 Ebury Road.

Based upon a standard density of 30 dwellings per hectare, the site could accommodate up to 15 dwellings.

The SA LDD allocates a number of non Previously Developed Land Green Belt sites to be released from the Green Belt and allocated for housing. This includes H17, H27, H37 and H38.

The proposed site would provide an urban extension to the existing built up limits of Rickmansworth and would represent an accessible and sustainable location to accommodate additional housing development. Certainly, the site offers a more accessible and sustainable location than any of the sites referred to above.

The site has also been assessed against the criteria set out in Appendix 2 of the Core Strategy (see attached) and scores reasonably well (778), particularly in relation to accessibility factors. However, it is noted that many criteria require a subjective assessment in selecting the score of 1 - 10.

This compares to the other Green Belt non PDL sites as follows (information taken from Appendix 4) ;

It is considered that in order to properly justify the SA LDD, the Council should consider all of the reasonable alternative sites – based upon proportionate evidence.

In this case, the Council are requested to consider to suitability of the site rear of 59-99 Ebury Road, Rickmansworth, and undertake their own assessment of the site to consider whether the site is more suitable than a number of the other identified sites. The Council are not considered to have considered the most appropriate strategy with the Preferred Options Site Allocations LDD.

It is considered that the site should be included in preference to a number of the other non- PDL Green Belt sites, in meeting the site allocation requirements of the District.

The Council has sought submission of potential housing sites for consideration since 2008. This site has not been previously put forward to the Council for consideration as a housing site and therefore has not been assessed or subject to consultation. No change required.

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H17 – Branksome Lodge, Loudwater – scores 614 The site does not offer such an accessible or sustainable location as the Ebury Road site.

H27 – Stockers Farm Road, Rickmansworth – scores 759. The site does not offer such an accessible or sustainable location as the Ebury Road site.

H37 – Land at Foxgrove Path/Heysham Drive, S Oxhey – scores 766. The site does not offer such an accessible or sustainable location as the Ebury Road site.

H38 – Land off Lytham Avenue, S Oxhey – scores 737. The site does not offer such an accessible or sustainable location as the Ebury Road site.

It is contended that the Council have not set out the most appropriate strategy by not considering all of the reasonable alternatives, including land rear of 59 – 99 Ebury Road, Rickmansworth. If non PDL Green Belt land is required to be released in order to accommodate the District's housing needs, then it is considered that the site rear of 59 – 99 Ebury Road, Rickmansworth should be considered and weighed against the relative merits of the other non PDL Green Belt sites identified in the LDD.

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The Site Allocations Local Development Document (SALDD) is overly optimistic in regard to the deliverability of proposed allocations and as such the document would fail to effectively secure a rolling supply of housing sites across the plan period, in accordance with Policy CP2 of the adopted Three Rivers Core Strategy (TRCS) and paragraph 47 of the National Planning Policy Framework (NPPF).

Policy CP2 of the TRCS sets a target for the delivery of 180 dwellings per year in the period 2001 - 2026. The most recent housing trajectory published by Three Rivers District Council (TRDC) is contained within the Annual Monitoring Report 2011 (AMR). This illustrates that the release of sites allocated for residential development will be phased across the plan period. The information provided at Appendix 1 of the AMR confirms that sites which are currently under construction or benefit from full / outline planning permission (totalling 567 dwellings) are expected to be exhausted by April 2015. Accordingly, the delivery of housing beyond 2015 will be reliant on those sites proposed for allocation under Policy SA1 of the SALDD. At paragraph 4.5, the SALDD indicates that the combination of housing completions in the district since 2001 and existing commitments equates to a total supply of 2,898 dwellings. This includes an allowance for 190 dwellings through the emergence and delivery of windfall sites in the future. The SALDD therefore goes on to establish that a further 1,602 dwellings need to be delivered in the period 2012 – 2026 in order to satisfy the adopted target, this equates to 114 dwellings per year.

5% buffer

It should however be acknowledged that paragraph 47 of the NPPF requires that local planning authorities identify sufficient deliverable housing sites to provide a 5 year rolling supply of housing, plus a 5% buffer. The additional 5% can be rolled forward from the latter part of the plan but this approach will inevitably result in an ever increasing deficit in supply toward the back end of the plan period and it A robust approach to land supply would therefore ensure that a sufficient number of sites are identified now to deliver the additional 5% across the entire plan period. The SALDD seeks to allocate specific sites to accommodate 1,658 dwellings in the period to 2026, an additional 56 dwellings over an above the target identified at paragraph 4.5 of the document. A 5% buffer would however equate to 80 dwellings, such that the proposed allocations would be insufficient to satisfy the requirements of the NPPF across the full extent of the plan. If those sites considered to be committed by TRDC fail to deliver housing as expected (including the windfall allowance of 190 dwellings), the residual target will increase and therefore so will the 5% buffer. There are a number of other assumptions within the SALDD which raise questions over the supply of housing land and therefore the effectiveness of the plan. These are considered below:

In order for Policy SA1 to be sound, it must make provision for the delivery of an adequate number of sites to satisfy the adopted housing targets imposed by Policy CP2 of the TRCS and the requirements of the NPPF to identify 5 year rolling supply of housing sites, plus a 5% buffer. Accordingly, it is necessary for the SALDD to identify further sites to accommodate at least 74 additional dwellings toward the back end of the plan period. If the proposed windfall allowance is discounted or amended to reflect changes in planning policy, relating to residential garden land, then sites to accommodate up to 190 additional dwellings should also be identified. It is crucial that the SALDD takes a realistic and cautious approach to the supply of housing sites over the entire plan period. An approach which fails to identify a sufficient number of sites will quickly result in a shortfall in supply and as such may leave TRDC vulnerable to 5 year housing land supply challenges. In such circumstances, TRDC will lose control over where development should be located and when it should be delivered. It is considered that 'Land West of 10 Toms Lane, Kings Langley' represents an appropriate and deliverable housing site which is capable of contributing towards redressing the deficit in supply discussed above. Representations submitted by Bidwells, on behalf of the Wellcome Trust Ltd, provide detailed comments in respect of the decision to omit the site for the SALDD as part of the site selection process. These representations confirm that there is no evidence to support the omission of the site and therefore, given the discussion had above in terms of overall land supply, it should be proposed for allocation within the SALDD.

5% buffer

The Annual Monitoring Report (2012) sets out that there are 870 dwellings currently with planning permission (full or outline) which are expected to be exhausted by 2019. The AMR also shows that delivery beyond 2015 will rely on sites proposed for allocation in the Site Allocations document coming forward.

Appendix 2 of the Annual Monitoring Report (2012) sets out an assessment of whether Three Rivers has a five year supply of deliverable sites for housing. This assessment has been completed in accordance with the NPPF and includes a 5% buffer and shows that Three Rivers does have a five year supply.

NPPF paragraph 47 is clear that the 5% buffer should be moved forward from later in the plan period. While the proposed allocations do provide for dwellings in excess of the target, providing a buffer against non-delivery, applying a 5% buffer to the overall housing target set out in the Site Allocations document (which is in accordance with the target set out in the Core Strategy which was adopted following independent examination) would be contrary to the NPPF and is not considered necessary.

Windfall allowance

Paragraph 5.19 and Table 2 of the adopted Core Strategy set out that a windfall allowance of 38 dwellings a year has been included in the trajectory between 2021 and 2026 (a total of 190 dwellings). While NPPF paragraph 48 specifically refers to the potential for windfall sites to be included in the five-year supply where there is compelling evidence, it does not rule out the inclusion of windfall sites in considering longer term housing supply. As accepted through the examination of the Core Strategy, there is evidence to support the inclusion of a windfall allowance in Three Rivers. The windfall allowance has been reviewed and 38 dwellings a year has been found to still be appropriate. While NPPF paragraph 48 excludes delivery on garden land from inclusion in any windfall allowance, the definition of windfall sites in the NPPF is 'sites which have not been specifically identified as available in the Local Plan process. They normally comprise previously-developed sites that have unexpectedly become available'. Therefore while windfalls will normally comprise previously-developed sites, sites not on previously developed land (including garden land) are not excluded from

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required. change

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Windfall Allowance

The SALDD advises that a windfall allowance of 38 dwellings per year (totalling 190 dwellings) has been included in the last 5 years of the plan period (2021-2026). The TRDC Strategic Housing Land Availability Assessment Update 2010 (SHLAA 2010) confirms that no windfall allowance was made within the SHLAA 2008 because it was considered, at the time, that there were not genuine local circumstances to justify such an allowance (Section 6.3). Nonetheless, the SHLAA 2010 indicates that the housing capacity of assessed sites is insufficient to satisfy the necessary targets (RSS at the time) and therefore suggests that a windfall allowance is included in order to redress any shortfall. The inclusion of a windfall allowance within TRDC's housing trajectory is intended as a makeweight for an anticipated shortfall in supply, rather than being a genuine reflection of local circumstances. The NPPF does allow for the inclusion of windfall sites in the calculation of 5 year housing land supply if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply (paragraph 49). This would seem to be a reasonable approach, given that trend based data should provide a reasonably firm indication of the sources of supply which have very recently contributed to the delivery of housing and therefore provide some certainty over the continuation of such trends in the short term.

The NPPF does not however specifically allow for the inclusion of windfall sites for the purposes of plan making (as was the case within the now superseded PPS3 - Housing). This is perhaps a reflection of greater uncertainty over the emergence and delivery of windfall sites in years 6-10 and beyond, given that trend based data is less likely to be robust. It is therefore questionable as to whether the NPPF provides any policy support for an allowance for windfalls in the last 5 years of the plan period, particularly as the calculated figure is derived from trend based data from 2001-2009.

In any event, we have serious concerns over whether the number of dwellings expected to emerge from windfall sites is realistic. The basis for the proposed windfall allowance of 38 dwellings per annum is summarised within Table 6.5 of the SHLAA 2010. This provides monitoring information in order to assess the number of dwellings delivered on small windfalls sites (1-4 dwellings) in the district in the period 2001-2009. Approximately half of the supply identified in the table was delivered through the redevelopment of existing residential sites.

It should however be acknowledged that changes to PPS3 in 2010, now encompassed in the NPPF, amended the definition of previously development land in order to discount 'land in built up areas, such as private residential gardens'. Given the nature of infill development in high value districts such as Three Rivers, it would be reasonable to assume that a high proportion of windfall development in the period 2001-2009 occurred on or included residential garden land. Such sites are far less likely to come forward in the current policy climate and therefore should be disaggregated from trend data used to inform the SALDD windfall allowance. Accordingly the proposed windfall allowance is not justified by robust and credible evidence.

Mixed Use Redevelopment of Employment Sites

Kings Langley Employment Area (Housing Allocation Ref: H(3)) is identified in its entirety as having capacity for the development of 150 dwellings across the plan period. Specific parcels of the employment area are also identified for mixed development under proposed Employment Allocation Ref: E(e). It is not clear whether housing development should be confined to those specific areas also identified for mixed uses or whether the redevelopment of other parts of the employment area for residential uses would also be acceptable. Clarification from TRDC in this respect is requested. The Site Allocations Supporting Information Report 2010 (SASIR) confirms that there is some landowner support for the redevelopment of the employment area but that the land is in multiple ownerships and therefore may require some assembly.

It is also noted that part of the area lies within the flood zone and therefore flooding issues would need to be addressed as part of any development. The Environment Agency Flood Map and the TRDC Strategic Flood Risk Assessment (SFRA) indicate that, in fact, large parts of the employment area fall within Flood Zone 2 - 3, indeed the SFRA recommends that parts of the area (Happy Valley, Kings Park and Masters Yard) are only provisionally allocated for mixed uses until detailed flood modeling is completed. It is not clear whether this work has been undertaken and if so whether the outcomes would allow for residential development. The NPPF is however quite clear that development should be directed away from areas at highest risk of flooding. Local Plans should apply a sequential, risk based approach to the location of development to avoid, where possible, flood risk to people and property.

A flood risk sequential test was undertaken by Halcrow Group (on behalf of TRDC) in 2009. This document concludes that constraints such as the Green Belt, along with the absence of alternative redevelopment sites in Flood Zone 1 will result in a need to release land within the study area

the definition of a windfall. Three Rivers does not have any policy which would necessarily prevent delivery of housing on garden land where other policy objectives would be met, and therefore there it should not be assumed that these sites will no longer contribute to the delivery of housing in Three Rivers. The windfall allowance is therefore considered justified.

Mixed Use Redevelopment

Kings Langley employment area is identified as a proposed housing site with capacity for 150 dwellings. Specific employment sites within this area are also identified under site Ee as having potential for mixed use development, however the housing site H3 includes a wider area than just the sites identified for mixed use development under site Ee. Detailed flood risk modelling has been completed for this area as part of the Strategic Flood Risk Assessment (2012) and shows that no part of the site proposed for allocation would be within flood zone 3. While parts of the site would be within flood zone 2, sequential test (2012) has been carried out indicating that development of this site would be sequentially preferable in accordance with the NPPF. While across the whole of site H3 there is land in multiple ownerships, submissions have been put forward on behalf of some landowners within this area demonstrating that housing is deliverable on some parcels within five years.

Flood Risk

As set out above, the Strategic Flood Risk Assessment was updated in 2012 and revises the assessment of flood risk of some housing sites. No sites are proposed for development within flood zone 3. A 2012 Sequential Test has also been undertaken which demonstrates that the sites proposed are sequentially preferable in accordance with the NPPF and the Environment Agency have commented that they find all of the site allocations to be sound and legally compliant.

Lapse Rate

As the sites proposed for allocation have been individually assessed, a lapse rate has not been included. In addition, while a windfall allowance has only been included between 2021 and 2026 in accordance with the adopted Core Strategy, windfall sites will continue to come forward between now and 2021 and therefore housing delivery can reasonably be expected to be higher than set out in the housing trajectory as a result of these windfalls. Therefore it is not considered necessary to include a lapse rate allowance.

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(including Kings Langley Employment Area) for redevelopment. However, development in the study area should be directed to Flood Zone 2, unless sites in Flood Zone 3 are able to satisfy the exception test. Accordingly, there is still some doubt as to whether it will be technically possible to deliver residential development in those parts of Kings Langley Employment Area which fall within Flood Zone 3.

The SALDD indicates that the employment area is capable of delivering housing from 2012 onwards. This would seem to be an extremely optimistic approach given that there continues to be uncertainty over land ownership and flood risk matters. Additional, site specific evidence is required in order to assess the deliverability of the proposed allocation. At the present time, it is questionable as to whether the site is appropriate to accommodate any residential development and in any event, it is no more than a broad area of search and therefore, in accordance with provisions of paragraph 47 of the NPPF, should not be included within years 1-5 of the housing trajectory.

Allocations in Areas at Risk of Flooding

In light of the potentially prohibitive flooding constraints experienced by the King Langley Employment Area, it is also relevant to note that a further 7no. sites which are proposed for allocation through the SALDD fall within an area at risk of flooding, either in part or fully. The table below identifies proposed allocations which are flood affected, along with the relevant Flood Zones taken from the SFRA.

Site Ref: Address SFRA Flood Zone

H(23) Langwood House, High Street, Rickmansworth 2
H(24) Gas Works, Salter Close, Rickmansworth 2-3
H(25) Bridge Motors, Church Street, Rickmansworth 2-3
H(26) Depot, Harefield Road, Rickmansworth 1-3
H(27) Depot, Stockers Farm Road, Rickmansworth 2 (in part)
H(28) Land South of Tolpits Lane 1-3

The sites listed above, when combined with the Kings Langley Employment Area, are expected to deliver 330 dwellings over the plan period, this equates to 20% of capacity of all sites proposed for allocation.

As noted above, the sequential test undertaken by Halcrow considers this approach to be justifiable, given constraints such as the Green Belt. Nonetheless, flooding issues are currently high on the political agenda. There is reluctance from buyers to consider properties in areas which are at risk of flooding and moreover there are significant questions over the availability of buildings insurance and mortgages for such properties. Questions must therefore be raised over whether it is appropriate for the SALDD to direct a substantial number of new homes to areas at risk of flooding and whether it will even be technically possible to deliver new homes on such sites, particularly those in Flood Zone 3 which would be subject to the NPPF exception test. It is also questionable whether there will be an appetite from developers to invest in sites which present significant technical challenges and may be difficult to sell.

Lapse Rate

The comments provided above suggest that certain sites proposed for allocation will not come forward for development as anticipated and may not be delivered at all. It is therefore considered entirely appropriate to make allowances within the SALDD for the non-delivery of sites. The SHLAA 2010 makes an allowance of 2.5% for the non-delivery of identified sites (Section 6.2). We are told that this figure is derived from past rates of non-implementation of planning permissions, although no data is provided to substantiate the calculation. Nonetheless, the SALDD fails to adopt a similarly cautious approach, such that all proposed allocations are expected to deliver the anticipated number of dwellings. Given that the 2.5% identified in the SHLAA 2010 is based on sites which already benefit from the certainty of planning permission, it is not unreasonable to suggest that allocations, which are yet to negotiate the planning process, are even more likely to yield a proportion of undelivered sites. Indeed, although the principle of development would be established through the site allocation process, there are numerous financial, technical and operational constraints which could prevent a particular site from coming forward.

It is therefore considered entirely appropriate to apply a lapse rate in order make realistic allowances for the non-delivery of allocated sites. In the absence of any data to the contrary, the 2.5% lapse rate established by the SHLAA 2010 represents a reasonable approach. A 2.5% lapse rate would reduce the capacity of the housing allocations identified within the SALDD (1,658) by 41 dwellings. If a higher lapsed rate were to be applied in recognition of the greater uncertainty associated with allocated sites (compared to those with planning permission) then the anticipated capacity would be further reduced.

Summary and Conclusion

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In light of the above, it is considered that Policy SA1 of the SALDD fails to identify a sufficient number of sites to effectively deliver the housing targets imposed by Policy CP2 of the TRCS. If the 5% buffer required by the NPPF is taken into account then the SALDD will need to identify sufficient sites to accommodate 1,682 dwellings, 24 more than currently proposed. It is also questionable whether it is appropriate to include a windfall allowance in the last 5 years of the plan period and even if windfalls are included, whether the figure of 38 dwellings per year is realistic, given recent changes in planning policy.

In addition, it is considered entirely appropriate to apply a lapse rate to the anticipated number of dwellings to be delivered from sites proposed for allocation, particularly given the uncertainty associated with existing employment areas and flood affected sites. It is therefore entirely appropriate to build in realistic allowances for non-delivery. The SHLAA applies a lapse rate of 2.5% and in the absence of any evidence to suggest that this figure should be increased or decreased, it would be appropriate to roll this forward to the SALDD.

Accordingly, it is quite possible that the supply of housing identified by the SALDD will fall well short of the required level. The table below calculates the potential shortfall in supply if all of the factors discussed above are taken into account. The table does not however seek to quantify any potential shortfall as a result of non-delivery at Kings Langley Employment Area and across flood affected sites, as this will depend on a number of unknown factors and in any event may be accounted for in the proposed lapse rate.

A 4,500 CP2 Target 2001-2026
B 2,898 Completions + Commitments @ April 2012
C 190 Proposed Windfall Allowance 38 x 5
D 2,708 Commitments – Windfalls B – C
E 1,792 Residual Target A – D
F 1,881 Residual Target + 5% E + 89 (5% of 1,792)
G 1,658 Proposed Allocations SALDD
H 1,617 Proposed Allocations – 2.5% Lapse Rate
G – 41 (2.5% of 1,658)
I -264 Shortfall in Supply F – H

In light of the above, it is necessary to identify additional site(s) for allocation in order to redress the anticipated deficit in supply. Even if the proposed windfall allowance of 190 dwellings is accepted, there will still be a deficit of 74 dwellings.

Effective – Policy SA1 would fail to effectively satisfy the housing targets set by Policy CP2 of the TRCS. By failing to make allowances for the non-delivery of identified sites, the Policy also provides no back up plan if allocations do not deliver the number of dwellings anticipated.

Justified – Policy SA1 is not justified by robust and credible evidence in respect of the proposed windfall allowance and the number and timing of mixed use development at existing employment areas, given issues of flood risk and land ownership.

Consistent with National Planning Policy – Policy SA1 does not make provision for 5% buffer in housing land supply in accordance with paragraph 47 of the NPPF and fails to take account of changes in the definition of previously developed land, provided at Appendix 2 of the NPPF, when calculating the proposed windfall allowance.

Positively Prepared – In failing to properly plan for the delivery of housing across the entire plan period, the SALDD has not been positively prepared. The number of sites proposed for allocation is led by a desire to limit growth in TRDC to the minimum level rather than plan for the realistic development needs of the district. A positive approach would be to anticipate circumstances which may prevent the housing targets set by Policy CP2 of the TRCS from being satisfied and take appropriate actions to identify suitable sites to redress any shortfall in supply.

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6012 9/300 39/SA 1/2	Thrive	SA 1	<p>I note that the document confirms your Core Strategy identifies the need for the provision of 4,500 dwellings in Three Rivers between 2001-2026. It is not clear from the document how you have assessed the strategic housing needs for the area in determining that 4,500 dwellings will meet those needs and i would be grateful if you could provide me with more information.</p> <p>Site Allocations- we would refer you to our previous responses and highlight comments we have made previously on the significant number of development opportunities which could be achieved by pooling the land holdings of Thrive Homes and Three Rivers District Council. This would help achieve the Core Strategy objectives of maximising development on previously developed land, in order to minimise the need for incursions in to the Green Belt.</p>	No change required.	As stated in the Core Strategy housing figures for 2001-2016 are based on monitoring information and the five year land supply assessment required by National Policy. Beyond 2016, the Strategic Housing Land Availability Assessment Update (2010) and other evidence base information are used to project the expected proportions of sites within existing urban areas and sites on the edge of existing settlements. Beyond 2012, a windfall allowance has been included in the trajectory. This is on the basis that historically, conversions of between one and four houses into flats and newbuild of one or two dwellings have contributed an average of 38 dwellings a year to housing supply.	No required.	change
6012 8/300 38/SA 1/2	Mr Lyne	SA 1	<p>These representations are prepared on behalf of Mr S Lyne and respond to the Site Allocations Proposed Submission Consultation November 2012. Mr S Lyne is the owner of Fairways Farm, north of Bucknells Lane, Abbots Langley. The land is currently designated as Green Belt, however, it is considered that the site is available, suitable and deliverable for residential uses.</p> <p>1.2 These representations consider the 'soundness' of the Site Allocations Pre Submission consultation document (SAPSD). It is our submissions that the SAPSD as drafted is 'unsound'. The substance of our representations is set out in section 2.0 and in section 3.0 we detail the changes we consider necessary to make the document sound.</p> <p>2.0 Representations</p> <p>2.1 Our response relates to Policy SA1. This section examines the key objections to the document which lead us to conclude that the DPD is not 'sound'. Our findings are linked to the tests of soundness identified by The Planning Inspectorate (PINS). These representations include information and evidence to support the objectors submission and identifies the changes to the DPD sought by the objector and suggested amendments.</p> <p>Soundness Under the Planning and Compulsory Purchase Act 2004 S20 (5)(b) an Inspector is charged with checking that the Core Strategy is "sound".</p> <p>2.2 To be 'sound' a SAPSD should be:</p> <ul style="list-style-type: none"> •justified; •effective; and •consistent with national policy. <p>2.3 To be "justified" the SAPSD must be: (i) founded on a robust and credible evidence base; and (ii) the most appropriate strategy when considered against the reasonable alternatives.</p> <p>2.4 To be "effective" the SAPSD must be:</p> <ul style="list-style-type: none"> (i) deliverable; (ii) flexible; and (iii) able to be monitored. <p>2.5 It is our submission that the SAPSD as drafted is not sound as it is not "justified" or "effective". The substance of our submission is set out below.</p> <p>Background</p> <p>2.6 The site has been the subject of an on-going promotion since an earlier appeal Inspector's positive comment towards the lack of Green Belt function of the site back in in 1974. The landowner regrets that his proposals have been disregarded and would question the robustness and transparency of the various Local Development Framework panel meeting decisions that have led to the submission of this plan.</p> <p>2.7 Notwithstanding the above, the subject site, Fairways Farm, was previously part of a joint promotion with the adjacent Penfold Golf Course. The proposal at that time, known as Fairways Garden Village, proposed redevelopment of both sites over 8.2ha of land with capacity for approximately 300 homes. These proposals were duly assessed by the Council as part of its Sustainability Appraisal and Site Allocation Site Score assessment process. A number of alternative sites scored higher than the Fairways Garden Village proposals and were duly included within the Council's strategy. The Fairways Garden Village was rejected as an</p>	To make the SAPSD sound the Council's evidence base must be updated to reflect the amended nature of the Fairways Farm proposals. This will require a re-appraisal of the Fairways Farm site as illustrated at Appendix 1. Our own conservative re-appraisal of the Fairways Farm site illustrates that the current SAPSD should include the Fairways Farm site as it scores more superior than the current selected sites and there are other material planning reasons for its inclusion. The inclusion of the Fairways Farm site would be "justified" i.e. the most appropriate strategy when considered against the reasonable alternatives. <p>3.2 In addition, it is considered that the SAPSD must build in sufficient flexibility to make up any shortfall in housing delivery identified by our assessment in Appendix 4. This will ultimately require the addition of further sites within the Site Allocations DPD to ensure delivery of the minimum housing requirement set out in the adopted Core Strategy DPD. This is required to make the SAPSD "effective" i.e. deliverable and flexible.</p> <p>3.3 Based on the foregoing it has been identified that the minimum changes necessary to make the DPD satisfy the tests of "soundness" by being "justified" and "effective" require the inclusion the Fairways Farm site as illustrated at Appendix 1 but may also require further allocations.</p> <p>3.4 It is therefore submitted that the inclusion of the Fairways Farm site as a "Proposed Housing Site Allocation" will make the DPD "sound".</p>	Appendix 2 of the Annual Monitoring Report (2012) sets out an assessment of whether Three Rivers has a five year supply of deliverable sites for housing. This assessment has been completed in accordance with the NPPF and includes a 5% buffer and shows that Three Rivers does have a five year supply. <p>NPPF paragraph 47 is clear that the 5% buffer should be moved forward from later in the plan period. While the proposed allocations do provide for dwellings in excess of the target, providing a buffer against non-delivery, applying a 5% buffer to the overall housing target set out in the Site Allocations document (which is in accordance with the target set out in the Core Strategy which was adopted following independent examination) would be contrary to the NPPF and is not considered necessary.</p> <p>The amended proposal has been assessed and the Council considers it is not appropriate for allocation as a result of the impact on the Green Belt and Bucknalls Lane.</p>	No considered necessary.	change

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option.

2.8 It was clear that Members and local residents rejected the Fairways Garden Village site following concern at the scale of growth proposed by the Fairways Garden Village, the use of access from the A405 and the significant loss of the Green Belt land required to accommodate development in the order of 300 dwellings.

2.9 The land owner, Mr Shaun Lyne, has responded to these concerns and in July 2011 formally wrote to the Council's Planning Policy team and the Local Development Framework Members Working Panel to confirm that it was no longer the intention to progress the proposals for Fairways Garden Village. Having listened to local concern and feedback from Members, Penfold Golf Course would no longer form part of the proposals.

2.10 The alternative proposals, which have been before the Council since July 2011, are for more modest development on the land Fairways Farm only. We include at Appendix 1 a Masterplan which illustrates the current proposals.

2.11 The submitted Masterplan is conceptual and does not illustrate individual house types but establishes potential footprints for development. Based on the potential footprint achievable and the size of site (3.3ha) the Masterplan shows the potential of residential development in the range of 70 to 100 new dwellings.

2.12 The current proposals are of a significantly lower scale than previous proposals and more in keeping with the lower density character of the existing area. The development does not propose flats and focuses on more family units in keeping with 3-4 bedroom family units within the area. These will be well landscaped and emphasis placed on green spaces. The proposal will also minimise the amount of Green Belt land to be developed as the adjacent golf course is to be retained in this proposal, which will maximise the amount of openness and green space retained.

2.13 It is also important to know that the site does not suffer from any constraint to development and is deliverable now. The site is not a risk from flooding, unlike a significant number of the Council's selected housing sites.

2.14 Vehicle access is proposed from Bucknalls Lane. The landowner has commissioned a highway assessment to determine the appropriateness of the access proposals which is enclosed at Appendix 2. The report, which has previously been submitted to the Council, demonstrates that the proposed means of access is acceptable to the Highway Authority as the junction is appropriate and the highway network can accommodate the development proposed. In addition it has been demonstrated that there is a good public transport service close the site improving the sustainability credential of the proposal. Clearly proposals for 70-100 dwellings is significantly less than previously proposed and will be accommodated in the network without detriment to the character of the local area as demonstrated by the Transport Statement.

Objection

2.15 The Council has selected sites to be put forward within the Proposed Submission DPD as allocations. These sites have been informed by the evidence base and Sustainability Appraisal (SA). Previously, the Council did not appraise the Fairways Farm proposals through its SA and had continued to judge the subject site as part of wider proposals for the Fairways Garden Village. We therefore believe that the site has been prejudiced through earlier stages of the plan making process because the alternative proposals were not considered as part of the SA process at the appropriate stages. It was our position that the amendments to the Fairways Farm site must be taken into account in order for the SAPSD to be "justified" i.e. founded and a robust and credible evidence base and the most appropriate strategy when considered against the reasonable alternatives.

2.16 Following several requests by the landowner the Council has now re-assessed the latest proposals for the site (excluding the land at Penfold Golf Course). However, we do not believe the Council's assessment of the site to be robust or accurate. There are inconsistencies within the Council's scoring of individual sites against its sustainability indicators and there is a need to reconsider the scoring process to address any inconsistencies.

2.17 In light of the foregoing, we have therefore undertaken to re-appraise the amended proposals for the Fairways Farm site using the Council's Housing Site Selection Criteria contained in Appendix 6 of its Sustainability Appraisal and the site score matrix contained in its Site Score Assessment 2012.

2.18 We enclose at Appendix 3 the results of our site score re-appraisal of the Fairways Farm site. The Council has scored the Fairways Farm proposals at 718, however when the site previously formed part of the wider Fairways Garden Village proposal it was scored 730 as in the Council's original assessment. The Council has indicated that the previous proposals were not as suitable as the current and therefore it follows that the new proposal would score higher than its predecessor as it addresses a number of concerns raised by the previous proposal. Our subjective assessment for Fairways Farm (excluding Penfold Golf Course) has scored 931 based on a conservative assessment using the Council's own criteria. The justification for the uplift in the sites score is set out in full at Appendix 3, however in summary this has been due to the following:

Site Ownership: The site is within a single ownership and is a deliverable and available site. It has therefore received a maximum score.

· Green Belt Impact: The proposed site is more modest and will use 60% less Green Belt land.

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The proposed impact has been deemed to be significantly less than previous proposals and the site score will improve on this basis.

- Tree Preservation Orders: There are no TPO on site. It therefore received a maximum score.
- Flood Zone: The site is within FZ1. It therefore received a maximum score.
- Ground Water Protection/SSSI/Wildlife Site/Listed Buildings/Locally Listed Buildings/Air Quality: There are no known constraints. It has therefore received a maximum score.
- Noise: There is appropriate mitigation available should noise be an identified constraint.
- Employment: The site is within close proximity and accessible to employment opportunities.
- Primary Shopping/Secondary Shopping/Local Centre/Local Shops/Library: The site is highly accessible by public transport to the main shopping areas of the Borough.
- Bus Service: The A405 is served by three regular bus routes with stops in lay-bys on both sides of the road immediately north of the Bucknalls Lane junction. The southbound stop is located about a 420m (5-minute) walk distance from the nearest point of the site, and 780m (a 10-minute walk) from the furthest point.

2.19 In light of the foregoing it is submitted that the proposal site should be re-assessed in light of the observations made above. It is our submission that the proposal site scores considerably more favourable in SA than some of the sites the Council has selected to allocated for development and therefore should be considered as a superior candidate for a residential allocation.

2.20 It is acknowledged that SA is one of many considerations in plan making and therefore a sites performance within SA is not the sole reason alone to allocate sites for housing. Indeed, the Council has provided site specific comments within its evidence base document entitled: "Site Allocations Supporting Information" (Nov 2012) which identifies the Council's decision making on the Fairways Farm site as follows:

1. the development may not create a defensible Green Belt boundary against further encroachment to the west;
2. there is an element of flood risk; and
3. the proposals would have an impact on the road network.

2.21 In response to 1 above, it is our submission that the Fairways Farm will create a defensible boundary because the site is neatly contained within a triangular area, wedged between the M1 and A405, with residential development to the south, makes it an ideal site for release of land for housing purposes, without future threats to the broader Green Belt. This has been endorsed by an Inspector in a previous appeal lodged in 1974, the Planning Inspector noted the following in relation to this site: ...the large triangle of land (including the appeal site), bounded to the east by the M1 motorway, to the west by the North Orbital Road (A405), and to the south by development fronting the north side of Bucknalls Lane, serves no practical purpose as part of the metropolitan green belt and that the case for the retention of this land in the green belt would be difficult to sustain against a comprehensive, well-planned development thereof, substantially for residential and complimentary purposes. (Appeal Ref: W/723/66)

2.22 It is our submission that the Inspector's comments remain relevant today. The NPPF clearly stresses the importance of defensible boundaries against further encroachment on the Green Belt. The NPPF states that boundaries should be clearly defined and carefully considered "so as not to include land where it is unnecessary to keep permanently open", as has been shown to be the case with the Fairways Farm site.

2.23 The NPPF also states that "If the boundaries are drawn excessively tight around existing built up areas it may not be possible to maintain the degree of permanence that Green Belts should have". Fairways Farm would be on land with defensible boundaries against further encroachment and is well positioned within 15 minutes walk of Garston National Rail station, an extensive local bus system, major auto routes, and is within walking distance of the amenities of Garston. Among others, these factors contribute towards making the Fairways Farm site the more sustainable option for a future housing development.

2.24 In respect of 2 above, only a modest area within the south east corner of the site is subject to fluvial flood risk in accordance with the Environment Agency flood maps. There is adequate mitigation that can be put in place to ensure that properties are flood resilient and that the proposals do not increase the risk of flooding elsewhere. Further, the proposed access scheme would not be within the flood zone allowing safe access and egress in a flood event.

2.25 Finally, in relation to 3 above, the landowner has commissioned a highway assessment to determine the appropriateness of the access proposals which is enclosed at Appendix 2. The report, which has previously been submitted to the Council, demonstrates that the proposed means of access is acceptable to the Highway Authority as the junction is appropriate and the highway network can accommodate the development proposed.

2.26 It is therefore our submission that the proposal site scores more favourably than its predecessor against the Council's sustainability and site score indicators. It is therefore our submission that the Fairways Farm site would therefore be more appropriate for a development allocation than the majority of sites that have been identified within the current draft of the SAPSD as suitable for allocation. The Fairways Farm site score of 931 would rank the site within the top 10 site scores.

2.27 Based on the foregoing it is our submission that the Fairways Farm site should be included within the Site Allocations DPD as an identified housing site safeguarded for housing development. It therefore follows that the SAPSD as drafted is not "sound" because it is not "justified". To be "justified" the SAPSD must be: (a) founded on a robust and credible evidence base; and (b) the most appropriate strategy when considered against the reasonable

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alternatives.

2.28 We have demonstrated that the SAPSD is not founded on a robust or credible evidence base as it is not based on up to date accurate assessment and this must be updated to reflect the amended nature of the Fairways Farm proposals. Further, our re-appraisal of the Fairways Farm site illustrates that the current SAPSD should include the Fairways Farm site as it scores more superior than the current selected sites and there are other material planning reasons for its inclusion set out in Appendix 3. This again serves to demonstrate that the current strategy would not be the most appropriate strategy when considered against the reasonable alternatives i.e. the inclusion of Fairways Farm.

2.29 We are also concerned that a number of the selected sites within the SAPSD are not deliverable in the plan period due to a number of specific site constraints. Further, a significant number of the proposed allocation sites are recent additions and have not all been the subject of scrutiny through the consultation process.

2.30 In light of the foregoing we have exercised our planning judgement and undertaken to review the current 'Proposed Housing Site Allocations' contained within the SAPSD. We have considered whether the sites are developable in accordance with NPPF paragraph 47, which defines developable as: available (now), suitable (close to facilities) and achievable (within 5 years).

2.31 We enclose at Appendix 4 our assessment of the 'Proposed Housing Site Allocations' and have determined that a number of the sites are not developable in the Plan period due to, among others, as follows:

- a number of the sites perform important Green Belt functions and their loss will weaken the function of the District's Green Belt;
- site constraints, such as contamination and/or flood risk – insurers are increasingly rejecting insurance for homes in flood risk locations;
- policy objections, such as building on playing fields contrary to Sport England policy;
- overestimated supply, NPPF has removed the minimum density requirement of 30 dwellings per hectare.
- The Council's estimates are based on providing flat developments which will not meet the Districts housing need profiles which seeks larger family properties within lower density developments;
- The Council has not provided evidence that the sites are viable for redevelopment and relocation of existing uses; and
- South Oxhey major town centre regeneration, which has serious delivery constraints, and no site specific allocations.

2.32 We would draw attention to one major proposed allocation at South Oxhey Town Centre H(35) as set out in Appendix 4. This proposed site area is not an allocation and is not suitable for this document. The Council has not identified precise and specific land parcels suitable to accommodate the dwelling capacity of 280. The sites are windfall development and will be provided for within a subsequent SPD. The South Oxhey Town Centre allocation should not be pursued through the Site Allocations DPD without specific sites. There is no explanation as to how the quantum of development has been calculated, whether sites have been identified and whether landowners are willing to release land.

2.33 The redevelopment proposals present, among others, the following issues:

- Whilst the site is within the ownership of the Council there is a need for the Council to buy back the leases on the properties to enable redevelopment and to regain ownership of a number of properties previously sold to housing associations. The Council has not produced any evidence to demonstrate the sites are deliverable at the point envisaged;
- There are significant number of existing uses in the area, which may not wish to be relocated or join in any redevelopment plans;
- It is likely that the Council would have to use Compulsory Purchase Orders to either assemble the land or relocate businesses which for this type of development may take years to complete and there is no evidence of the Council's intention in this respect;
- There is no evidence that the proposed development is viable;
- Local consultation has shown that there is objection to the proposals by local stakeholders;
- It is understood that there is a significant delay in the process of trying to buy back homes from the local housing associations; and
- The status of various leasehold arrangements is currently unknown which would add a further layer of complexity in the land assembly.

2.34 The foregoing assessment (full text within Appendix 4) has therefore identified a potential shortfall of 828 dwellings in the Council's housing land supply due to reliance on non deliverable sites or sites which are not the most appropriate strategy when considered against the reasonable alternatives. It is therefore submitted that the Council must plan for additional housing site allocations to make up the shortfall because the current strategy is not "sound" as the SAPSD is not "effective", which requires the DPD to be: (i) deliverable and (ii) flexible.

2.35 It is our submission that the SAPSD does not currently satisfy this test. It has therefore been determined that the SAPSD must build in sufficient flexibility to make up any shortfall identified and allocate additional housing sites capable of delivering a minimum of 828 additional dwellings. This will ultimately require the addition of further sites within the Site Allocations DPD to ensure delivery of the minimum housing requirement set out in the adopted Core Strategy DPD. The Fairways Farm site is an appropriate candidate for inclusion within the Site Allocations DPD. Our own conservative re-appraisal of the Fairways Farm site results in a score of 931, which would place it within the top 10 sites considered by the Council through this process. 2.36 A further example of the SAPSD shortcoming is that the Council has over estimated the capacity of a number of the sites it has put forward for development. There is no

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longer pressure to pursue higher density development where this does not reflect local character. The property market and housing demand is seeking larger family properties within lower density developments and no longer a significant proportion of flats. It is therefore considered that the Council's approach is overly optimistic on site density and delivery and therefore in reality fewer homes are likely to be delivered in the Plan period.

2.37 It is therefore our submission that SAPSD must build in sufficient flexibility to make up any shortfall identified. This will ultimately require the addition of further sites within the Site Allocations DPD to ensure delivery of the minimum housing requirement set out in the adopted Core Strategy DPD.

2.38 In addition, it is submitted that it is a significant consideration that the Core Strategy sets out minimum housing targets to be delivered and not ceilings on growth. It is therefore a sound strategy to ensure a flexible supply of sites to exceed the delivery of the minimum housing targets. This is because the East of England Plan figures falls significantly short of what is needed based on evidence about housing pressure, affordability and household projections (Paragraph 5.5 of the East of England Plan). The latest household projections show a more severe picture for the Three Rivers District.

Conclusion

2.39 For the foregoing reasons it is submitted that the SAPSD is not sound as it is not "justified" or "effective". We identify below how we believe a minor addition to the strategy would satisfy the above requirements and make a "sound" DPD.

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When reviewing the original Site Allocations Document the Association commented that the replacement of commercial and industrial sites by housing will inevitably lead to increased car use because employment opportunities will not fit conveniently with the provision of public transport. This conflict between the provision of housing and the removal of employment opportunity will mean that residents' needs for cars will conflict with the proposed reduction in provision of car parking spaces in town centre developments. This is symptomatic of a conflict in government policy between the drive for more housing and the wish to reduce car use. The elimination of employment opportunities in towns such as Rickmansworth must inevitably lead to more car use as public transport is limited to the Metropolitan Line/Chiltern Railways axis and transport to Watford. There has been no change in the document to reflect the effect of this conflict between different national policies.

The Association argues that the document is flawed in that it does not show the proposed dwelling density required to achieve the suggested number of dwellings on each of the proposed housing sites. This omission conceals the conflict between the proposals in the Site Allocations document and TRDC Policy DM1.

The problem has been highlighted by the fact that the recent planning application for Site H23, Long Island Exchange, has been submitted with a proposed housing density that is over twice the, already high, density proposed in the Site Allocations Document. Clearly the suggested housing densities in the site allocations document will be regarded, by developers, as a baseline on which to base bids for even higher densities.

The Revised document specifies planned timescales for the various developments. These should be adhered to and earlier development refused unless a developer can demonstrate that earlier development will not create economic harm to the town. For example, the development of the Long Island Exchange site in 2013, rather than between 2016 and 2020, will destroy the hotel and a substantial source of employment well before any hotel development, such as that proposed for Employment Area E (e), and already approved, can be built and opened.

The Association is concerned that the plans for development do not take account of possible overloading of existing infrastructure, especially local roads and drains. The town centre is already prone to flooding, in part because it is low-lying with virtually no gravity flow for drains, and part because drains are blocked and in part because the exact course and condition of those drains is unknown. Development should be put on hold until, at least, the mapping and clearance of the town's drains is complete. As for overloading of the town's roads is concerned, it is noted that, for example, there shall be no provision of additional primary school places at St Mary's School, which is in Stockers Farm Road, because of the additional traffic that would be generated. Despite that assessment the Site Allocations Document continues to propose a high density development on that road.

No change required.

The document has identified both housing and employment sites across the district. No change required.

The dwelling capacity is an indicative figure based on the site area. There is a degree of flexibility as stated in Policy SA1: 'Sites should be developed at an overall capacity which accords generally with the dwelling capacity given for that site'.

The phasing of allocations is designed to enable a continuous and deliverable 5 year supply of housing land throughout the District over the whole of the plan period. It takes into account information about the availability of sites, the provision of infrastructure, and the need to phase delivery over the whole plan period. The Council can review the phasing of allocations if felt necessary at anytime.

The detailed impact of future development would be assessed through the planning application process.

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6017 5/300 45/SA 1/2	HCC Minerals and Waste	SA 1	<p>None of the housing site allocations are located within the areas of search for permanent waste management facilities that are listed in the Waste Local Plan. This is also the case in relation to the allocated sites and employment land areas of search that are identified in the county council's Waste Site Allocations Proposed Submission document, published in November 2012. Although the majority of the district is located within the sand and gravel belt, none of the allocated housing sites are considered to have significant, workable mineral reserves that could be extracted prior to any development taking place. Therefore, there would be no minerals sterilisation issues raised in relation to Minerals Policy 5-Mineral Sterilisation. Three Rivers District Council should be aware that if any of the housing allocations identified within the proposed submission document are to come forward for future development within the plan period, the county council is keen to ensure that new housing development should have regard to the overall infrastructure required to support it, including a sufficient number of waste management facilities that should, where practical, be integrated accordingly. It should also be added that the design of new development should ensure that it accommodates space for recycling boxes, wheelie bins and compost bins and be positioned in a way that it enables refuse trucks to gain access easily. The use of recycled materials where appropriate during the construction phase and the re-use of unavoidable waste where possible is encouraged.</p>	No change required.	Comment noted. The detailed impact of development on the area would be assessed through the planning application process.	No required.	change
6017 9/300 46/SA 1/C	M Hosking	SA 1	<p>Rickmansworth Town Centre is being asked to absorb a large percentage of the housing allocation proposed in the Local Development Plan (approximately 506 units). Rickmansworth is already way over its allocation for the 1996-2011 plan (by approximately 150 units) and is now being asked to absorb even more housing. No consideration seems to have been given to the importance of having a diverse range of housing in the area. Almost all the housing built as a result of the last plan has been flats and apartments, and this Plan seems to be making the same mistake. Where is the analysis showing what is required in the area? What about families who require terraced, semi detached and detached homes with gardens?</p> <p>The plan includes a proposal to build 90 units in areas where thriving businesses are presently trading (the largest being Long Island Hotel). Has any consideration been given to the economic impact of this on Rickmansworth? A brief investigation has revealed other sites that would be far more suitable for development - why have these not been considered?</p>	No change required.	<p>The Strategic Housing Market Assessment (2010) provides information on the current and future housing needs of the District. Policy CP3 of the Core Strategy states that the Council will require housing proposals to take into account the range of housing needs, in terms of size and type of dwellings as identified by the Strategic Housing Market Assessment (2010) and subsequent updates.</p> <p>It is not possible to comment on alternative sites without details.</p> <p>Rickmansworth is a sustainable and appropriate location for additional housing because it is a Principal Town with good access to public transport, services and facilities.</p> <p>The detailed impact of development on Rickmansworth would be assessed through the planning application process.</p>	No required.	change
6018 1/300 47/SA 1/2	Rickmansworth Chamber of Commerce	SA 1	<p>We are writing to express our concern over the soundness of the Housing Development Site Plan of the Three Rivers District Council's Local Development Document.</p> <p>We feel that some background has to be given to the reason for this letter:</p> <p>Firstly, since the local plan was initially drawn up there has been a significant change in planning policy, summarised in the National Planning Policy Framework document of March 2012. Secondly, the East of England Regional Assembly which previously set out quotas for housing development was abolished in April 2010. Finally, the position of Rickmansworth is a little unusual in that it does not have a Parish/Town Council or a Neighbourhood Forum. The latter has recently been proposed to Three Rivers District Council however, it is still under review. As a result of this 'unparished' status, the community does not have the same level of communication and therefore engagement with planning applications and consultations made to and by, Three Rivers District Council.</p> <p>With regard to local consultation, the Localism Bill will provide, and has provided the necessary conduit for the community to build a Neighbourhood Plan, but this will not be completed or even started, until</p> <p>a) the Neighbourhood Forum has been agreed by Three Rivers District Council and</p> <p>b) after the submission of the Local Development Document to Central Government.</p> <p>With regard to our concerns over the soundness of the Housing Site Development Plan being submitted, we are questioning the balance of commercial vs residential development in central Rickmansworth area. We have no doubt that there is need for further housing in Rickmansworth and the surrounding area, but there is also a necessity to ensure the sustainable economic development of the area too. Bearing in mind the Portas Review</p>	No change required.	<p>The document has taken into consideration the National Planning Policy Framework.</p> <p>The Strategic Housing Market Assessment (2010) provides information on the current and future housing needs of the District. Policy CP3 of the Core Strategy states that the Council will require housing proposals to take into account the range of housing needs, in terms of size and type of dwellings as identified by the Strategic Housing Market Assessment (2010) and subsequent updates.</p> <p>It is not possible to comment on alternative sites without details.</p> <p>Rickmansworth is a sustainable and appropriate location for additional housing because it is a Principal Town with good access to public transport, services and facilities.</p> <p>The detailed impact of development on Rickmansworth would be assessed through the planning application process.</p> <p>The Core Strategy establishes that 15% of new housing development should be in the principal</p>	No required.	change

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published earlier this year highlighted the need to bring diverse businesses to the High Street, it would certainly be in opposition to these suggestions if more commercial sites were converted to residential units in the town centre. As will be seen later in this letter the diversity of type of housing, we feel also needs to be given more consideration than has been proposed in the LDF for the centre of Rickmansworth.

We question the need for the allocation of 15% (= 506 new units) of the overall total of proposed housing development to be made in Rickmansworth Town centre as follows:

1. From a very cursory investigation into the planning applications and buildings erected as a result, it would appear that there have been in the last 10-15 years a total of around 402 new units built in the centre of Rickmansworth alone. These comprise predominantly flats and apartments:

- One High Street - 14 apartments and parking spaces - 2011
- Goodyer House - 14 flats and parking spaces - 2011
- Cloisters Court - 20 flats with parking - 2005
- Middlemarch Lodge - 42 units for elderly residents with parking - 2011
- The Quadrant - 39 units - 2004
- Woodman House - 24 flats with parking - 2009
- 17 -23 High Street - 24 flats - 1998
- Penn Place and Northway 176 units - 1999
- Wharf Lane - 48 units - 1999

2. This exceeds the total set out in the 1996-2011 plan of 254, by around 150 units.

3. There has been very little/no housing stock built to accommodate families requiring terraced, semi detached or detached housing.

4. This sustained, high density development has not been matched by improvements in infrastructure and has increased the level of traffic in the town centre dramatically.

5. All of the above sites were previously commercial sites and has therefore already created a serious imbalance in the economy and the future prosperity of the town centre.

6. Only by using extant commercial sites in the town centre can any future developments of the scale required be accommodated.

We question the methodology of identifying sites for housing development.

1. Many of the sites identified for housing in the centre of Rickmansworth are extant and viable commercial sites providing employment, income, amenities and prosperity to the town:

- Long Island Hotel (50 units) - occupancy rates show that this hotel is used by local businesses during the week, 85% occupancy, and by the wider community at the weekend, 100% occupancy
- Langwood House (15 units) - currently all but one of the offices in this building are occupied.
- Bridge Motors & petrol station (20 units) - one of the oldest businesses in Rickmansworth, constantly in use.
- Royal British Legion Club (5 units) - we have no village or town hall in Rickmansworth and as such their rooms are in constant use by the local community.

2. There are a number of sites that have not been included in the 1996 - 2011 plan or the current Housing Development Site Plan of the Local Development document that are either currently being developed or have been commercial sites in the past and have remained empty for some time:

- Comet Tankers Ltd 45-47 Church Street (previously residential) - 2 units approx
- Windrush/The Cottage - 13 Units currently being built
- Greville House (Abbeyfield) Chorleywood Close - 15 units approx
- Orbital Fasteners - 331 Uxbridge Road - 20 units approx (Mill End)
- Comet Tankers Ltd - 231 Uxbridge road (previously residential) - 10 units approx (Mill End)

Total 60 units.

In summary, the National Planning Policy Framework sets out the 3 dimensions of sustainable development as economic, environmental and social, and whilst the proposed sites may well fulfil the requirements of the environmental dimension (although we question the need to demolish a hotel that has been in existence since 1888 and has a long and rich history in the life of Rickmansworth), our concern is that it would certainly fall short on the economic and social dimensions.

town.

Planning applications would be submitted to determine whether the proposed development is in accordance with the relevant planning policies of the Local Plan.

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6018 2/300 48/SA 1/1	Transport for London Commercial Development Directorate, Property	SA 1	<p>[S] CBRE is instructed by Transport for London, Commercial Development Directorate to submit a representation to Three Rivers District Council's Proposed Submission Site Allocations Development Plan Document (SA DPD) with particular regard to its interests regarding Site S (d) "Croxley Green – land north east of Baldwin's Lane". Following a review of education needs, CBRE considers that only one new secondary school may need to be allocated in Three Rivers District to deliver the required secondary pupil places identified as required in the South West Hertfordshire education area during the Plan period. Given that land at Baldwins Lane, Croxley Green remains identified in the Proposed Submission SA DPD as the "least unacceptable" location for a school, CBRE considers that it is necessary to assess the alternative development opportunities presented by the Site. CBRE has reviewed the proposed housing site allocations within the proposed submission SA DPD and its supporting evidence base, and considers the document "unsound" as the approach to the allocation of sites is not effective, not justified, and not consistent with national policy set out within the NPPF.</p> <p>CBRE questions whether there is sufficient flexibility built into the Proposed Submission SA DPD to deliver the housing target of 4,500 units without the need for a further review of the Green Belt boundary before the end of the Plan period. To ensure the SA DPD is „sound“, further sites should be allocated, or identified for safeguarding, to meet the housing targets during the Plan period and beyond. CBRE considers that land at Baldwin's Lane is situated in a sustainable location, a designated key centre, and should be released from the Green Belt and allocated or safeguarded for residential development with park land. Such a development is capable of delivering benefits to the local community providing enhanced and publicly accessible green space, and improved links to the Grand Union Canal and Cassiobury Park, whilst ensuring the separation between the urban areas of Croxley Green and Watford is maintained.</p>	Further allocation/ identification of housing sites to deliver housing target.	The County Council have requested the allocation and reservation of two secondary schools- one site in Mill End/ Maple Cross and one site in Croxley Green. The sites have been identified following the results of several consultations and technical reports undertaken by HCC.	No change considered necessary.
6018 3/300 49/SA 1/2	Metropolis Planning and Design	SA 1	<p>We wish to object to the soundness of the submission in that the exclusion of sustainable and deliverable sites such as ours at East Lane, Bedmond Village, will result in the Council failing to deliver its 5 year land supply obligations as set out in the NPPF. There has also been an inconsistent approach taken to site selection within the Green belt in terms of the sustainability criteria adopted.</p> <p>Metropolis PD made representations on 30 June 2011. Following the submission of this report, Officers made a recommendation to Executive Committee on 5 September 2011 that parcel 1 should be included as an allocated housing site. The other parcels (2 to 6 inclusive) were not put forward for consideration. The Councillors rejected the advice of their professional officers and did not accept this recommendation. No detailed reasoning was provided although the official Council minute stated: - East Lane Bedmond - that Parcel 1 be not included for potential housing site because of its impact on Green Belt.</p> <p>The results of the report demonstrated that when various parcels of land are assessed on an individual basis, their sustainability credentials are significantly enhanced, as compared with the previous exercise undertaken by the Council. Officers accepted these findings (at least in part) as reflected in their recommendation to the Executive Committee to allocate parcel No 1 for housing.</p> <p>The report demonstrated that the grouping of sites (Nos. 1-6) could be appropriately phased as part of a masterplan to help secure the delivery of new dwellings in the District during the plan period. It also showed that the individual characteristics of site No 4 lend itself to future development consideration in its own right. This particular site benefits from an existing access onto Bedmond Road; has limited visibility from the public realm (due to existing tree screening to be retained) and does not possess any physical constraints to development.</p> <p>Since our previous report was undertaken there has been progress on the Government's emerging National Planning Policy Framework (NPPF). This builds on the themes contained in 'Planning for Growth' which was the subject of a written ministerial statement from The Rt Hon Greg Clark MP issued on 23rd March 2011.</p> <p>This ministerial statement represents a call to action on growth and was issued as part of a set of Government proposals to help rebuild Britain's economy. It states:- 'The Government's top priority in reforming the planning system is to promote sustainable economic growth and jobs. Government's clear expectation is that the answer to development and growth should wherever possible be 'yes', except where this would compromise the key sustainable development principles set out in national planning policy.'</p> <p>The statement also confirms the Government's commitment to introduce a strong presumption in favour of sustainable development in the forthcoming National Planning Policy Framework, which inter-alia, will expect local planning authorities to plan positively for new development.</p> <p>The statement encourages Local Planning Authorities to be proactive in driving and supporting</p>	Inclusion of land at East Lane, Bedmond Village as a mixed use allocation.	Appendix 2 of the Annual Monitoring Report (2012) sets out an assessment of whether Three Rivers has a five year supply of deliverable sites for housing. This assessment has been completed in accordance with the NPPF and includes a 5% buffer and shows that Three Rivers does have a five year supply.	No change considered necessary.

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the growth that the country needs, including meeting the housing needs of their area. It states:- 'They should ensure that they give appropriate weight to the need to support economic recovery, that applications secure sustainable growth are treated favourably (consistent with policy in PPS4), and that they can give clear reasons for their decisions.'

The Secretary of State for Communities and Local Government will attach weight to this ministerial statement as a material planning consideration when determining any applications that come before him.

In terms of the NPPF itself, a draft document was issued for consultation during July 2011 which places a new presumption in favour of sustainable development at the heart of the planning system. This sets a clear expectation on planning authorities to plan positively to promote development and create sustainable communities.

The document sets out the objectives for the planning system and for achieving sustainable development. In particular, it stresses that there is no contradiction between facilitating increased levels of development and the environmental role of planning, provided that development is planned and undertaken responsibly.

In respect of 'Local plans', it states that development plans must aim to achieve the objective of sustainable development, stressing that plans should be prepared on the basis that objectively assessed development needs should be met unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits.

In terms of housing, it includes a clear intention to increase housing supply to meet demand, and not just need. The relevant section 'Significantly increasing the supply of housing' states:- 'To boost the supply of housing, local planning authorities should:

Use an evidence-base to ensure that their Local Plan meets the full requirements for market and affordable housing in the housing market area, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;

Identify and maintain a rolling supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements. The supply should include an additional allowance of 20% to ensure choice and competition in the market for land;

Identify a further supply of specific, deliverable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15; (note: windfall sites are not to be included)

Regarding Green Belts the document sets out that it is appropriate to review boundaries as part of the local plan process. It stresses that authorities should consider such boundaries having regard to their intended permanence in the long term so that they are capable of enduring beyond the plan period. It states:- 'When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development....'

Housing Need

The Government's household projections in England (2008 – 2033) represent their latest estimates (issued on November 26th 2010). The relevant key points from this data are:- The number of households in England is projected to grow to 27.5 million in 2033; an increase of 5.8 million (27%) over 2008, or 232,000 households per year.

Population growth is the main driver of household growth, accounting for nearly three-quarters of the increase in households between 2008 and 2033.

One person households are projected to increase by 159,000 per year, equating to two-thirds of the increase in households.

By 2033, 19% of the household population of England is projected to live alone, compared with 14% in 2008.

By 2033, 33% of households will be headed by those aged 65 or over, up from 26% in 2008.

The South East region has the largest absolute increase in households of 39,500 per year from 2008 to 2033, amounting to a 28% increase on the number in 2008.

Whilst the South East has the largest predicted absolute growth in households, it should be noted that the East of England region (within which the jurisdiction of Three Rivers District Council falls) has the greatest percentage change at 34%.

The Coalition Government has made it clear that these official household projections are of fundamental importance in planning for new housing and that they aim to deliver on their objective of 'providing sufficient housing to meet demand'. The explanatory notes to the November 2010 projections, published by the Government, state that the statistics:- 'are an

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important part of the evidence base for assessing future housing demand and informing national and local policies on housing and planning’.

New Homes Bonus

This financial incentive for Local Authorities to support growth was introduced in April 2011. Its objective is to help engender a positive attitude to growth, and create an environment in which local authorities are provided with real incentives to deliver housing growth. It is designed to address the previous disincentive that existed, where increased housing in communities often meant an increased strain on public services and reduced amenities.

The bonus payment match funds the additional Council tax raised for new homes (and properties brought back into use), with an additional amount for affordable housing, for the following 6 years. The Department has set aside £1 billion over the Comprehensive Spending Review period for the scheme including nearly £200 million in 2011-12 and £250 million for each of the following 3 years.

The Government’s intention is that this will be a simple, powerful, transparent and permanent feature of the local government finance system, and that it will ensure that the economic benefits of growth are returned to the local area. Proposed Allocation at Bedmond Village

The proposed allocation for a housing led mixed use scheme is sustainable in terms of both its location and the construction/renewable technologies that will be incorporated.

All of the 6 sites perform well against the Council’s sustainability criteria and in particular site 4 which fronts onto Bedmond Road.

Taken as a whole, the sites would work extremely well as a residential led masterplan forming a natural extension of the existing settlement, with opportunities to include community and environmental benefits.

The allocation would be consistent with the Government’s ‘Planning for Growth’ agenda and deliver much needed new housing in the District.

6022 Maurice
5/300 Grainger
51/SA
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My client has previously submitted representations in support of the allocation of the site for housing. The site is suitable for housing as the site is previous developed land, which is located within the built up area and is in a sustainable location, directly opposite Kings Langley Railway Station. The development of the site will also result in a number of planning and environmental improvements, including public access to the river.

Inclusion of site AH(1) identified in the Site Allocations Pre-Submission (Preferred Options) Additional Sites Document.

Whilst the site has some advantages, it was considered that the impact on the Green Belt in this part of the Gade Valley would not justify its inclusion as a housing site given its limited contribution towards future housing supply. No change considered necessary.

On behalf of my client, we hereby lodge an objection to the emerging Site Allocations Proposed Submission document, on the basis that it does not represent the most appropriate strategy for the provision of housing. The document fails the relevant test for the preparation of Local Plans, as set out in paragraph 182 of the National Planning Policy Framework (NPPF).

We wish to make the following points in support of our case:-

Firstly, the proposed housing allocation was supported by officers when they went out to consultation on the Site Allocations Pre-Submission (Preferred Options) Additional Sites Consultation in July 2012.

It should be noted that the land opposite Alpine Press was the only additional housing site included in the consultation document. It is clear from the consultation document that the Council considered that there was merit in allocating the Land opposite Alpine Press for housing development.

The Council stated that the site had a capacity of 5 dwellings and that its development would not require a change to the boundary of the Green Belt.

Secondly, it is evident from a review of the consultation responses that the majority of respondents support the allocation of the site for housing. As summarised in the table below, a total of 10 consultation responses were received, of which 7 were positive and only 3 objected. We consider that a 70% support rate is a firm indication that the site is suitable and appropriate for housing. We comment on the nature of the objections below.

One objection was received in respect of parking. The concern raised was that building on a car park may result in parking problems. However, it should be noted that this was not a reason for the Council deciding not to proceed with the allocation of the site. Notwithstanding this, we wish to make the following comments in response:

Firstly, the Alpine Press building is allocated for mixed use development in the emerging plan. When the Alpine Press site is redeveloped the Council will ensure that adequate parking is provided on site to serve it. As it is earmarked for development in the plan period, there is simply no need to retain the overflow car park.

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Secondly, the Alpine Press business operates from two sites, the other being at 1 Kingsley Park, which is within walking distance. Spare car parking capacity exists at Kingsley Park. Furthermore, spare capacity also exists at the main Alpine Press site. Therefore the overflow car park is not essential.

Thirdly, it should also be noted due to technological changes in the printing industry, fewer staff are now required. For example only 10-15 years ago, 8 people were employed to make the metal plates and now through the use of computers, the same output can be achieved by only 2 people. There is also no longer a requirement for design staff to be located on site, as the ability to transfer large files by the internet means that this work is now done by people located all over the world. The printing process itself is also now more compact and requires a much smaller floor area. The result of which is that fewer staff are located on site and the activities taking place from the Alpine Press premises, opposite the proposed housing site, could relocate to the larger premises at 1 Kingsley Park.

Two objections refer to the acceptability of building in the Green Belt. However, the Green Belt status of the site should not prevent its allocation for the reasons given below:

The Core Strategy identifies a need for the provision of 4,500 dwellings in Three Rivers between 2001 and 2026, of which, 25% are from sites located in the Green Belt. The development of Green Belt sites forms a key part of the Council's agreed approach to housing delivery. Some 17 of the 38 proposed housing sites in the Site Allocations Proposed Submission Consultation document are within the Green Belt.

The question of the Allocated Sites document is to establish which Green Belt sites will be allocated.

Secondly, the Site Allocations Proposed Submission document puts forward a total of 17 housing sites that are located in the Green Belt. Of which, the proposed site opposite Alpine Press is the most accessible. This is demonstrated by the table below:

The most accessible sites should be developed before more remote sites. However, the Allocated Sites document does not currently represent the most appropriate strategy for the provision of housing, as it excludes one of the most accessible sites in the district, approximately only 30 metres from a mainline station. As such, the document fails the relevant test for the preparation of Local Plans, as set out in paragraph 182 of the National Planning Policy Framework (NPPF).

Thirdly, the development of the Land opposite Alpine Press would not result in the merging of the settlements of Kings Langley from Abbots Langley, for the reasons given below: The site is within the existing built up area. This is demonstrated by the following plan, which shows the sites location in relation to existing buildings and hard standing, as well as residential curtilages. The site is a small gap in an existing built up frontage. It is not on the edge of the settlement and will not result in the closing of the gap between the settlements of Kings Langley and Abbots Langley. The following buildings exist between the site and the gap between the settlements of Kings Langley and Abbots Langley.

Finally, we do not consider that the Council has paid proper regard to the wide ranging benefits of development of this site for housing. These are set out in detail in our earlier submissions and include the following:

The far western part of the site next to the river could be appropriately landscaped and would offer an opportunity to improve the biodiversity of the river. Such an approach would comply with paragraph 7 of the NPPF, which refers to need to protect and enhance the natural environment, where appropriate, including helping to improve biodiversity. Developing the site offers the opportunity to provide for the maintenance and improvement of the public footpath, which runs along the western boundary. The footpath is overgrown and raises safety issues.

Developing the site offers the opportunity to provide public access to the river.

Previously developed land such as this should be developed before green field sites, in the interest of securing sustainable development, which is a key component of the NPPF.

Accessible sites close to public transport should be developed before more remote sites. The site is in a very accessible location, located directly opposite Kings Langley Station and also on local bus routes, with a bus stop right outside.

There are many groups of people who do not drive, including people with disabilities, who are reliant on rail services to access jobs in major settlements. There are no closer development sites to Kings Langley Station, so in terms of transport accessibility, the site scores very highly.

The site is within a gap within the existing built up area and is not in open countryside.

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The proposed use of the site for housing would be compatible with the established character of the area. The area contains many existing dwellings and a residential use is acceptable in planning terms.

In view of the above, we conclude that the Site Allocations Proposed Submission document does not represent the most appropriate strategy for the provision of housing. The document fails the relevant test for the preparation of Local Plans, as set out in paragraph 182 of the National Planning Policy Framework (NPPF).

The site represents an important opportunity to provide much needed new housing, in an accessible and sustainable location. The site should be allocated for housing.

Site H(1) Adjacent 65 Toms Lane, Kings Langley

6004 2/300 24/H1 /C	Hertfordshire Biological Records Centre	H1	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change
6012 1/300 32/H1 /2	Dacorum Borough Council	H1	Dacorum's comments are limited to the housing (i.e. H(1)-(3) inc.) and employment (i.e. E(e)) sites in Kings Langley which are closest to our Borough boundary and related infrastructure matters. All other proposed allocations have no significant implications for Dacorum. •Whilst we have no specific comments on the proposed small scale re-use of previously developed land in the Green Belt for housing, we would ask you to take into account the cumulative and cross-boundary impact of such development on the infrastructure of Kings Langley village. •With regard to the proposed conversion of some employment land within Kings Langley to residential H(3)/E(e)), we would welcome clarification of either (a) the specific area(s) within this zone that are suitable for residential; or, if this is not possible, (b) the way in which planning applications for changes of use to residential will be judged – especially if the assumed number of residential units is reached. This will help ensure that no local infrastructure thresholds are breached.	No change required.	The Council considers that cross boundary issues are important issues that would be discussed in future Duty to Cooperate meetings. Dacorum Borough Council would also be a consultee on any planning applications for development close to the boundary with Dacorum. The location of housing within site E(e), the infrastructure required and the detailed impact of future development would be assessed through the planning application process.	No considered necessary.	change
6013 0/300 39/H1 /2	Thrive	H1	We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H1 adjoining 65 Toms Lane, Kings Langley.	No change required.	Comment noted.	No required.	change
6019 0/300 50/H1 /C	Thames Water Utilities Ltd	H1	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No required.	change

Site H(2) Land at Three Acres, Toms Lane, Kings Langley

6004 3/300 24/H2 /C	Hertfordshire Biological Records Centre	H2	No HBRC ecological information for this site. The site includes a small remnant area of traditional orchard within the south east corner which has been recognised as a priority habitat. If this cannot be retained in any development, HBRC would expect compensation to be provided on site or elsewhere.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change
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6012 2/300 32/H2 /2	Dacorum Borough Council	H2	<p>Dacorum's comments are limited to the housing (i.e. H(1)-(3) inc.) and employment (i.e. E(e)) sites in Kings Langley which are closest to our Borough boundary and related infrastructure matters. All other proposed allocations have no significant implications for Dacorum.</p> <ul style="list-style-type: none"> Whilst we have no specific comments on the proposed small scale re-use of previously developed land in the Green Belt for housing, we would ask you to take into account the cumulative and cross-boundary impact of such development on the infrastructure of Kings Langley village. With regard to the proposed conversion of some employment land within Kings Langley to residential H(3)/E(e), we would welcome clarification of either (a) the specific area(s) within this zone that are suitable for residential; or, if this is not possible, (b) the way in which planning applications for changes of use to residential will be judged – especially if the assumed number of residential units is reached. This will help ensure that no local infrastructure thresholds are breached. 	No change required.	<p>The Council considers that cross boundary issues are important issues that would be discussed in future Duty to Cooperate meetings. Dacorum Borough Council would also be a consultee on any planning applications for development close to the boundary with Dacorum.</p> <p>The location of housing within site E(e), the infrastructure required and the detailed impact of future development would be assessed through the planning application process.</p>	No required.	change
6013 1/300 39/H2 /2	Thrive	H2	<p>We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H2 Three Acres, Kings Langley.</p>	No change required.	Comment noted.	No required.	change
6020 6/300 50/H2 /C	Thames Water Utilities Ltd	H2	<p>On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.</p>	No change required.	Comment noted.	No required.	change
6022 8/300 53/H2 /1	Cllr J Mann	H2	<p>Because of the siting of this site it is impossible to accommodate 20 houses on it despite its size and the fact that there are farm buildings on it at present.</p> <p>The impossibility arises because: * Single Lane and narrow lane * No pedestrian footway and no room to accommodate this * Narrow and low railway bridge * Toms Lane is two miles long and no way to escape as it is abutted by fields either side its whole length * Six miles round trip when bridge close * Toms Lane takes the brunt of traffic from Junction 8 on the M1 heading to Kings Langley and Watford which at certain times is very heavy * Three Rivers prides itself on being a pleasant place to live</p> <p>The problem is where it is: It lays behind two houses with only a narrow entrance onto Toms Lane. It would mean the demolition of at least one perfectly good four-bedroomed house to accommodate an entrance for traffic - which would be a waste.</p> <ol style="list-style-type: none"> Toms Lane at this point is very narrow with cars having to negotiate each other as they pass. The road at this point slopes sharply down between to embankments to the bridge at the end of the lane. The bridge is very low and narrow and can take only single lane traffic creating a back-log of cars up the slope past the entrance into Three Acres and onwards. Similarly there is a back-log of traffic the other way jamming the staggered cross-roads the other side of the bridge. Lorries often do not take heed of the low bridge sign and get stuck under the bridge adding to the back-log of vehicles. This can take twenty minutes or more to un-jam as the cars have to back up the road as there is no room to turn around. This is already a source of aggravation for residents living down that end of the road. Nothing can be done to alleviate the jamming. Highways have tried traffic lights down there but because of the staggered junction they have found that the wait at the lights is so long that vehicles refuse to wait and they have given up that idea. You cannot widen the road because of the high embankments either side. <p>This section of the lane at the bottom is too narrow for any pavements and is already a danger to pedestrians</p> <ol style="list-style-type: none"> All rainwater coming off the fields and peoples' gardens runs down this part of the road and in heavy rain it is a river. Toms Lane is 2 miles long and there is no escape route. It has fields behind the houses 	Dwelling capacity changed to a maximum of 10 houses.	<p>The dwelling capacity is an indicative figure based on the site area.</p> <p>The detailed impact of future development would be assessed through the planning application process.</p>	No considered necessary.	change

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both sides. People living at the bottom, where Three Acres is situated, which would include those who would live on this development, would have to negotiate the two miles there and back when the bridge is closed which is quite often. BUT it must be noted that in such a jam they would be unable to get out of their driveway or down the lane into it.

7. Other than dismantling the dismantling the railway line and building a wider railway bridge, there is no way to allow for this housing. This road cannot be widened.

8. This stretch of the road already creates great tension for current residents and the traffic built up by 20 more houses here, including two cars per unit and deliveries would overload the situation.

9. The problem is exacerbated because Toms Lane takes the brunt of the traffic travelling from M1 junction 8 down Toms Lane to Kings Langley and Watford.

Three Rivers does advertise itself in its manifesto as a pleasant place to live. This is already contentious at this point. The traffic, the narrowness of the lane is already a great problem at that end of Toms Lane AND the lack of provision for pedestrians. The amount of houses proposed is too great and will put a strain on the system. I know we need housing and would say that 10 on this site should be the maximum. Still more traffic than at present but a necessary evil.

The number of comings and goings with twenty more houses down there would be unsustainable.

Site H(3) Kings Langley Employment Area

<p>6000 8/300 07/H3 /2</p>	<p>Imagination Technologies</p>	<p>H3</p>	<p>Policy H(3) designates the wider Kings Langley Employment Area as a housing site allocation with a dwelling capacity of 150. As stated in previous representations, it is not appropriate or realistic to promote Imagination Technologies' site for uses other than employment given the commitment to the site that IT has.</p> <p>Home Park Industrial Estate is long established employment site which is currently the subject of redevelopment works, to improve and enhance its business/employment function. The first phase of this redevelopment process is largely complete and planning permission for phases 2 and 3 has been granted with construction expected to begin in 2013.</p> <p>If the site is redeveloped as envisaged, the site will have no potential (or surplus space) for any additional uses such as housing. Consequently the draft designation has no realistic prospect of coming forward during the plan period.</p> <p>Furthermore, IT is a high-tech company that require high security levels on site. This would therefore not be an appropriate site for mixed use developments due to potential security breaches.</p> <p>The site does not have any realistic prospects for mixed use development due to the existing, and long established office use on site and, more importantly, ITs plans fro redevelopment which are already underway. Furthermore, IT are the sole owner of the land and have no interest in promoting residential or mixed use development on their site - as demonstrated by the recent planning permission and works on site, they are strongly committed to improving their existing office buildings through redevelopment and have no scope or need for other uses.</p>	<p>H(3) designates a large area to housing. There are more appropriate areas, such as vacant or under-used land that could deliver the 150 housing target and therefore this policy should not include the Home Park Industrial Estate within the allocation.</p>	<p>There is a need to provide 4,500 dwellings in the District between 2011- and 2026. The proposed housing site is within an existing urban area with reasonable access to public transport, education, local shopping and open space. There are no expected significant adverse impacts on the environment.</p> <p>Furthermore the housing site would be on previously developed land in a Key Secondary Centre. It would be a mixed use development that would meet the needs of both local and community needs. Consequently it is not considered appropriate to remove site H(3).</p> <p>Policy SA2 sets out sites allocated as having potential for mixed used development may provide for mixed use development including, but not limited to business, industrial and storage or distribution; residential or community uses. Therefore designation as mixed use does not prevent the use of the site for business (as existing) however the allocation provides flexibility for the future.</p> <p>The Council does not consider it appropriate to remove Home Park Industrial Estate from the mixed used allocation.</p>	<p>No change considered necessary.</p>
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6004 4/300 24/H3 /C	Hertfordshire Biological Records Centre	H3	The site lies adjacent to the County Wildlife Site (CWS): Kings Langley Lake (ref: 75/010) to the north and Grand Union Canal / River Gade (ref: 76/006) to the west. In January 2012, the southern section of 75/010 was destroyed adjacent to the lake that is included in the allocated site. Future development of the site should take this into consideration. Proposals should include a buffer zone along the boundary of the proposed development with both CWSs and ensure all ecological considerations are addressed in any development proposals. Protected species records also present.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6010 4/300 26/H3 /1	Gade Investments Ltd	H3	<p>Site reference to north of Masters Yard (known as Abbots B) should not be designated wildlife site as no ecological interest following site clearance and reinstatement of land it has no interest and should be excluded as it is not based on latest evidence and so is unsound</p> <p>Also note flood risk does not apply to land north of Masters Yard (Abbots B site).</p> <p>Support allocation for housing - capacity of total area should be increased by 30 to 180 overall - this is attributed to capacity testing of the Abbots B site (about 0.8 Ha) which has shown capacity for up to 40 to 50 homes through a full mix of house types from family homes to apartments and maisonettes overlooking the lake - this is a useful addition to the housing capacity of the whole allocation area.</p> <p>This additional capacity is useful in ensuring that the District housing requirement is met - however if in the unlikely event that the Council feel that the overall number of allocations would be affected then other sites should be reduced in scale and or deleted (such as east of Railway Terrace on H1 and/or H2 and for example H17 which are weaker candidates for development compared to H3).</p>	<p>Increase capacity of allocated site H3 to 180 homes</p> <p>Delete reference to wildlife interest or flood risk north of Masters Yard</p>	<p>It should be noted that the policy provides an indicative capacity for each housing site.</p> <p>County Wildlife Sites are designated by Hertfordshire County Council and it is not considered appropriate to remove reference to an existing wildlife sites. Flooding is identified as a constraint on the whole of site H(3) which covers a larger area than that referred to. Any planning applications submitted would need to demonstrate that there would be no significant impact on wildlife or flooding as appropriate.</p>	<p>No change considered necessary.</p>
6012 3/300 32/H3 /2	Dacorum Borough Council	H3	<p>Dacorum's comments are limited to the housing (i.e. H(1)-(3) inc.) and employment (i.e. E(e)) sites in Kings Langley which are closest to our Borough boundary and related infrastructure matters. All other proposed allocations have no significant implications for Dacorum.</p> <p>Whilst we have no specific comments on the proposed small scale re-use of previously developed land in the Green Belt for housing, we would ask you to take into account the cumulative and cross-boundary impact of such development on the infrastructure of Kings Langley</p> <p>With regard to the proposed conversion of some employment land within Kings Langley to residential H(3)/E(e), we would welcome clarification of either (a) the specific area(s) within this zone that are suitable for residential; or, if this is not possible, (b) the way in which planning applications for changes of use to residential will be judged - especially if the assumed number of residential units is reached. This will help ensure that no local infrastructure thresholds are breached.</p>	No change required.	<p>The Council considers that cross boundary issues are important issues that would be discussed in future Duty to Cooperate meetings. Dacorum Borough Council would also be a consultee on any planning applications for development close to the boundary with Dacorum.</p> <p>The location of housing within site E(e), the infrastructure required and the detailed impact of future development would be assessed through the planning application process.</p>	<p>No change required.</p>
6013 2/300 39/H3 /2	Thrive	H3	We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H3 Kings Langley Employment Area.	No change required.	Comment noted.	<p>No change required.</p>

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6017 3/300 45/H3 /2	HCC Minerals and Waste	H3	<p>The proposed housing allocation at Kings Langley Employment Area (ref: H(3)) which is also within the mixed use allocation for employment (ref: E(e)), includes a current waste facility at Railway Terrace, which is located between the Grand Union Canal to the west and the main railway line to the east. This site is currently operated by Associated Asbestos Removal Ltd and is a safeguarded site, listed within the county council's latest Minerals and Waste Authority's Monitoring Report.</p> <p>Whilst it is recognised that not all of the area at Kings Langley Employment Area, will be developed for housing, the county council will oppose development proposals which are likely to prevent or prejudice the continual use of this facility for waste management purposes. This is unless alternative or enhanced provision is made for an equivalent facility, or it can be demonstrated that the need for the facility can no longer be justified. This position is stated under Policy 5: Safeguarding of Sites in the Waste Core Strategy and Development Management Policies document, adopted in November 2012.</p>	No change required.	Comment noted. The detailed impact of development on the area would be assessed through the planning application process.	No change required.
6020 5/300 50/H3 /C	Thames Water Utilities Ltd	H3	<p>We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In accordance with Policy CP8 of the Core Strategy and the text in section 5.81 of the Core Strategy developers should either demonstrate that capacity exists both on and off site or that additional capacity can be provided in time to serve the development and that it would not lead to problems for existing or new users.</p>	No change required.	Comment noted.	No change required.
6002 30/30 055/H 3/C	Environment Agency	H3	<p>The comments box indicates that part of the site is within flood zone. However, the re-modelling of the Gade through Kings Langley that Halcrow undertook on your behalf seems to remove all flood zones from the development site, so we do not believe that there will be a requirement for a Flood Risk Assessment based on fluvial flood risk.</p> <p>Further explanation of the 8m buffer is required (e.g. undeveloped, planted with native species) as indicated in our covering letter.</p> <p>Redevelopment of the site is likely to require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the current industrial use of the site, including known waste sites on the northern part of the allocation. Parts of the site are in Source Protection Zone (SPZ) 1, meaning that contaminants could reach a public drinking water abstraction point in less than 50 days. The rest of the site is in SPZ 2 (between 50 - 400 days to abstraction).</p> <p>There are a number of waste sites in the northern part of the allocation that operate under Environmental Permits from us. You should be aware of these sites when considering the sensitivity of receptors as part of any new developments. Residents could be a sensitive receptor to the dust, noise and visual impacts of these sites. As such, the location of such sensitive receptors needs to be carefully considered or the waste sites should be moved elsewhere as part of the redevelopment of the site.</p>	We feel that a comment should be added.	<p>The following alterations to the Comments section are proposed:</p> <p>Deletion of '<u>Part of site is within floodzone. Flood Risk assessment would be required to support planning applications on the site.</u>'</p> <p>Inclusion of '<u>A number of waste sites are located to the north of the site. Parts of the site are in Source Protection Zones 1 and 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.</u>'</p> <p>Amendment to 'Part of the site (north of Masters Yard) is identified as a wildlife site. Measures to avoid adverse impacts <u>and enhance biodiversity</u> will need to be provided by developers, supported by adequate ecological survey '.</p> <p>The Comments section states that a 'Minimum 8m buffer must be provided to River Gade'. No further detail is considered necessary as further guidance is available elsewhere.</p>	<p>The Comments section to be amended to include the deletion of: '<u>Part of site is within floodzone. Flood Risk assessment would be required to support planning applications on the site.</u>'</p> <p>Inclusion of: '<u>A number of waste sites are located to the north of the site. Parts of the site are in Source Protection Zones 1 and 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.</u>'</p> <p>Amendment to 'Part of the site</p>

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(north of Masters Yard) is identified as a wildlife site. Measures to avoid adverse impacts and enhance biodiversity will need to be provided by developers, supported by adequate ecological survey '.

Site H(4) Mansion House Farm Equestrian Centre, Bedmond Road, Abbots Langley

6004 5/300 24/H4 /C	Hertfordshire Biological Records Centre	H4	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6013 3/300 39/H4 /2	Thrive	H4	We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H4 Mansion House Farm Equestrian Centre.	No change required.	Comment noted.	No change required.
6021 5/300 50/H4 /C	Thames Water Utilities Ltd	H4	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.
6026 2/300 58/H4 /2	Taylor Wimpey	H4	3.2 We object to the proposed allocation of Site H(4). The site scores 772, with 22 unallocated sites, including Woodside Road, scoring higher. Given the existing use of the site, and its physical and capacity constraints, the site is unsuitable and is not the most appropriate for residential development, particularly as it is ascribed a capacity of 20 dwellings. 3.3 The site is located in the Green Belt to the north of Abbots Langley, beyond the built edge of the settlement. The site is approximately 250 metres south of the M25 Motorway, although no access to the Motorway can be gained at this point. The site is said to be classed as PDL in Appendix 2a of the SADPD; however the site is an equestrian centre and the majority of the site is taken up by a ménage which has impacted very little on the site's greenfield credentials, with further space taken up by stables and a Dutch barn (agricultural type buildings). Agricultural buildings are not included within the NPPF definition of previously developed land. The site is therefore considered to be greenfield site. 3.4 H(4) is a small site bordering agricultural fields to the north and east and open space to the west, across Bedmond Road. The existing housing that is located in the area is very low density with buildings all having high standards of design with a distinct local and historic character. Indeed, these surrounding dwellings include Listed Buildings and the Abbots Langley Conservation Area is only 125 metres to the south. The SADPD (November 2012) proposes a reduced dwelling capacity of 15 on this 0.38 hectares site (compared to 20 in the January 2012 draft), but this still represents a high density development of around 40 dwellings per hectare. The existing dwellings in this area are far from this density and as such a development of 15 units would be out of character with the surrounding area. The allocation and development of this site would contradict Core Strategy Policies CP1 (criterion f), CP3 and CP12 and the requirements of the NPPF; the allocation of this site therefore renders the SADPD unsound. 3.5 The site access must be gained directly off Bedmond Road, in close proximity to an access opposite which serves a number of dwellings and builders' storage yard. It is likely, therefore, that certain access mitigation measures will be required. The site is also likely to be subject to noise pollution from the M25 Motorway, a short distance to the north. This will result in a requirement for noise mitigation measures within buildings or on the wider site, potentially reducing the site's developable area. The deliverability of the site and its potential to meet the housing need of the District is questioned.	Omission of site H(4).	The site has good access to public transport, services and facilities and although the site is within the Green Belt the site has been developed and there are no significant impacts on the environment anticipated. Woodside Road with a dwelling capacity of 100 and also a primary school is a greenfield and green Belt site which is likely to have a significant impact on the Green Belt. There are concerns about access to the site and traffic in the area particularly given the proximity to three schools already in the area. The detailed impact of development on the area would be assessed through the planning application process.	No change considered necessary.

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Site H(5) Pin Wei. 35 High Street, Abbots Langley

6004 6/300 24/H5 /C	Hertfordshire Biological Records Centre	H5	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change
6021 6/300 50/H5 /C	Thames Water Utilities Ltd	H5	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No required.	change

Site H(6) Leavesden Pumping Station, East Lane, Abbots Langley

6004 7/300 24/H6 /C	Hertfordshire Biological Records Centre	H6	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change
6015 8/300 42/H6 /2	CPRE Hertfordshire	H6	The proposed Housing allocation includes land in the Green Belt, not previously developed. The allocation should be limited to the area of Previously Developed Land occupied by the pumping station. The remainder of land in the curtilage should remain open. The Council's proposed change conflicts with Green Belt policy in the NPPF which says that "Previously developed land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) (our emphasis) and any associated fixed surface infrastructure.	The allocation should be amended to include only the area previously developed and not the whole curtilage of the site.	It is not considered appropriate to amend site H(6) to only include previously developed land. The need for housing within the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt. Greenfield sites have been selected because not sufficient brownfield land is available, or suitable, for development. The detailed impact of future development on the site would be assessed through the planning application process.	No considered necessary.	change

6021 2/300 50/H6 /C	Thames Water Utilities Ltd	H6	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No required.	change
6026 3/300 58/H6 /2	Taylor Wimpey	H6	We object to the proposed allocation of this site for housing development as it is completely unsuitable for housing as well as being subject to a number of planning constraints. 4.3 The site scores 794, with 20 unallocated sites scoring higher. We question some of the scores attributed to this site, and suggest that it should actually rank lower. The site is given a Green Belt impact score of 35, but it is difficult to see why given the detachment of the site from other built up area. The site is located some way into the Green Belt to the north of Abbots Langley and is completely detached from the existing settlement by approximately 250 metres at its closest point, although this figure is misleading due to the layout of Abbots Langley, the site is somewhat further from the majority of the north/north eastern settlement edge. The site is 1km from the edge of Abbots Langley, when accessed along Woodside Road. By comparison, Taylor Wimpey's site at Woodside Road scores just 20, and this is much more closely related to existing built form. 4.4 In terms of site accessibility, the site is beyond the Institute of Highways and Transportation (IHT) Guidelines for Providing for Journeys on Foot (2000) for all services and facilities (except possibly secondary schools), including access to bus services. The site must be accessed along East Lane, a small lane wide enough for one vehicle only along its entirety (approximately 310 metres) and lined with mature vegetation which significantly overhangs the lane in places. 4.5 The site is bordered completely by mature trees with large canopies and beyond this to the north and south is further dense vegetation. These areas are likely to contain important wildlife habitats and the potential for protected species and other important flora and fauna. To the east and west the site is bounded by agricultural land. There is also a possibility that the site is contaminated, given its previous use. 4.6 The site is wholly inappropriate for housing development and allocation of this site would contradict Core Strategy Spatial Visions (b) and (j), Strategic Objectives S2 and S9, Policy CP1 (criterion l), Policy CP10 (Development Proposals Section), Policy CP11 (criterion b), Policy CP12, and the NPPF. There appears to be no justification for proposing to allocate the site and it is clearly not the most appropriate strategy when considered against the reasonable alternatives.	Omission of site (H6).	Although the site is in the Green Belt, it has been developed and no other significant impacts on the environment are anticipated. The site has good access to secondary schools and open space. The detailed impact of development on the area would be assessed through the planning application process.	No considered necessary.	change

Site H(7) Furtherfield Depot, Furtherfield, Abbots Langley

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6004 8/300 24/H7 /C	Hertfordshire Biological Records Centre	H7	No HBRC ecological information for the allocated site itself. However the site lies adjacent to a site to the south and west for which ecological information is held that is considered to be of local wildlife interest and supports records of protected species.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change	
6013 4/300 39/H7 /2	Thrive	H7	We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H7 Furtherfield Depot, Abbots Langley.	No change required.	Comment noted.	No required.	change	
6019 9/300 50/H7 /C	Thames Water Utilities Ltd	H7	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No required.	change	
6002 31/30 055/H 7/C	Environment Agency	H7	Redevelopment of the site will definitely require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the current depot use of the site, and the adjoining historic landfill site (Furtherfield council refuse tip). The whole site is in Source Protection Zone 2, meaning that contaminants could reach a public drinking water abstraction point between 50 – 400 days.	We feel that a comment should be added.	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>	change	
6026 4/300 58/H7 /2	Taylor Wimpey	H7	5.2 We object to the inclusion of this site as its location is less sustainable than that of the site at Woodside Road. The site is also subject to a number of planning constraints. 5.3 The site is within the Green Belt but unlike the site at Woodside Road, only borders existing areas of housing along one boundary. Although the site is not considered to be „freestanding“, it is poorly related to existing development in the area. 5.4 Due to its location there is little opportunity to successfully integrate any housing development into either the urban form or the surrounding landscape and any development is likely to have a visual impact on surrounding housing areas and there is no evidence that any realistic consideration has been given through further detailed study into this obvious constraint. 5.5 The SADPD proposes a dwelling capacity of 15 on a site of 0.34 hectares, a density of around 44 dwellings per hectare. Given the site's location, extending into the Green Belt and surrounded on three sides by open land, a development of 15 units would be out of character with its surroundings. The allocation and development of this site would contradict Core Strategy Policies CP3 and CP12 and the requirements of the NPPF; the site should not be allocated as it is not the most appropriate strategy when considered against the reasonable alternatives. 5.6 Were this site to be developed, it would have to be completely cleared of buildings and hard-standing. There is a possibility the site may be contaminated and this would require appropriate investigation and survey work followed potentially by lengthy remediation work.	Omission of site H(7).	It should be noted that the policy provides an indicative capacity for each housing site. The detailed impact of development on the area would be assessed through the planning application process.	No considered necessary.	change	
Site H(8) Leavesden Aerodrome, Abbots Langley								
6004 9/300 24/H8 /C	Hertfordshire Biological Records Centre	H8	The site supports a range of habitats and includes an area for which ecological information is held including records of protected species. The site would require full ecological assessment prior to an application.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change	

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6021 1/300 50/H8 /C	Thames Water Utilities Ltd	H8	<p>We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In accordance with Policy CP8 of the Core Strategy and the text in section 5.81 of the Core Strategy developers should either demonstrate that capacity exists both on and off site or that additional capacity can be provided in time to serve the development and that it would not lead to problems for existing or new users.</p>	No change required.	Comment noted.	No change required.
6026 5/300 58/H8 /2	Taylor Wimpey	H8	<p>We object to the proposed allocation of Site H(8). The site already benefits from outline planning permission and there is no clear evidence that its allocation does not represent double counting in the overall assessment of housing provision.</p> <p>Notwithstanding this we do not consider that the site is suitable for allocation in the event that the existing consent is not implemented as it is considered less appropriate for development than the site at Woodside Road. The site is within the Green Belt but unlike the site at Woodside Road, does not border any existing areas of housing and can therefore be considered less appropriate in terms of loss of Green Belt land. The context of the site in relation to existing housing in the area should be considered. Though we do not consider the site „freestanding“, it is poorly related to existing development in the area.</p> <p>6.3 Due to its location there is little opportunity to successfully integrate any housing development into the surrounding landscape and any development is likely to have a significant visual impact on surrounding housing areas. Were this site to be developed, it would have to be completely cleared of buildings and hard-standing. There is a possibility the site may be contaminated and this would require appropriate investigation and survey work followed potentially by lengthy remediation work.</p> <p>6.4 The site is located in close proximity to a business park, industrial units and outdoor storage areas. It is understood that the neighbouring industrial units and outdoor storage area is currently accessed through the site; necessary transport assessments would be required to assess the impact on the local road capacity should this site be developed. Furthermore, there are concerns about the capacity of local junctions were 425 dwellings to be developed on this site, particularly during peak times when the neighbouring business park is in operation.</p> <p>6.5 Although it is located within close proximity to an employment area, this is more of a constraint to the site than an opportunity, considering the likely highway impact as well as potential for adverse residential amenity impact (noise, air pollution etc). The site is not particularly accessible to other services or facilities however, with the SADPD Sustainability Appraisal at Appendix 2a identifying the site as beyond walking distance to a local convenience store, community facilities and health facilities, and admitting that the site is better related to Watford town centre than Abbots Langley/Leavesden.</p> <p>The site is not considered an appropriate location for housing development due to the proximity of existing commercial uses, possible contamination, access issues, its location within the Green Belt, its distance to services and its likely significant visual impact on the area.</p>	Omission of site (H8).	Planning permission has been granted.	No change considered necessary.
Site H(9) Hill Farm Industrial Estate, Hill Farm Avenue, Leavesden						
6005 0/300 24/H9 /C	Hertfordshire Biological Records Centre	H9	<p>No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.</p>	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.

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6020 3/300 50/H9 /C	Thames Water Utilities Ltd	H9	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In accordance with Policy CP8 of the Core Strategy and the text in section 5.81 of the Core Strategy developers should either demonstrate that capacity exists both on and off site or that additional capacity can be provided in time to serve the development and that it would not lead to problems for existing or new users.	No change required.	Comment noted.	No change required.
6023 2/300 55/H9 /C	Environment Agency	H9	Redevelopment of the site is likely to require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the current industrial use of the site. The whole site is in Source Protection Zone 3, meaning that contaminants could affect the groundwater beneath the site.	We feel that a comment should be added.	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 3. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 3. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>
6026 6/300 58/H9 /2	Taylor Wimpey	H9	7.2 We object to the proposed allocation of Site H(9) as it is not suitable for housing development, especially at a proposed density upward of 45 dwellings per hectare. The site scores well (981), with only one other allocated sites score higher. Although the site is free of most restrictive environmental designations, it has few other merits and it is difficult to understand how the site has scored as high as it did. 7.3 The site is poorly related to existing housing in the area; it abuts the Leavesden Park employment area immediately to the west, industrial buildings to the south and is contained by Langley Lane to the north. Currently, access to the site can only be gained from the south, through a number of industrial buildings. Should the Leavesden Aerodrome site be developed for 425 dwellings, there would be serious concerns regarding the capacity of local junctions, particularly during peak times when the neighbouring business park is in operation. This would only be made worse if this site were to come forward, particularly at such a high density. 7.4 Were this site to be developed, it would have to be completely cleared of buildings and hard-standing. There is a possibility the site may be contaminated and this would require appropriate investigation and survey work followed potentially by lengthy remediation work. 7.5 Although it is located within close proximity to an employment area, this is more of a constraint to the site than an opportunity, considering the likely highway impact as well as potential for adverse residential amenity impact. The site is not particularly accessible to other services or facilities however, with the SADPD Sustainability Appraisal at Appendix 2a identifying the site as beyond walking distance for a local convenience store, community facilities and health facilities, and admitting that the site is better related to Watford town centre than Abbots Langley / Leavesden. 7.6 The site is not considered an appropriate location for housing development due to the proximity of existing commercial uses, possible contamination, access issues and its distance to services.	Omission of site H(9)	The site consists of previously developed land within the Green Belt in a Key Centre with reasonable access to public transport, local services, education and open space. The detailed impact of development on the area would be assessed through the planning application process.	No change considered necessary.
Site H(10) Langleybury House/School, Langleybury						
6005 1/300 24/H1 0/C	Hertfordshire Biological Records Centre	H1	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage. The site is recorded as containing an ice house that may have potential to support bats.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.

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6012 5/300 36/H1 0/C	Ralph Trustees Ltd	H1 0	RTL continues to support residential development on the Langleybury site and appreciates that safeguarding of this housing allocation and its indicative capacity must be read in the context of the flexibility in the delivery of hotel/leisure and residential enshrined within Policy SA7.	No change required.	Comment noted.	No required.	change
6020 9/300 50/H1 0/C	Thames Water Utilities Ltd	H1 0	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No required.	change
Site H(11) Royal British Legion, Church Lane, Sarratt							
6005 2/300 24/H1 1/C	Hertfordshire Biological Records Centre	H1 1	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change
6013 5/300 39/H1 1/2	Thrive	H1 1	We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H11 RBL site, Sarratt: we note that this is an affordable-only site, which strengthens the argument in favour of management efficiency if it were to be developed by Thrive Homes.	No change required.	Comment noted.	No required.	change
6022 0/300 50/H1 1/C	Thames Water Utilities Ltd	H1 1	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No required.	change
6026 7/300 58/H1 1/2	Taylor Wimpey	H1 1	8.2 We object to the proposed allocation of Site H(11) as it is not suitable for housing development at a proposed density upward of 65 dwellings per hectare. The site scores relatively poorly (673), with 50 sites submitted but not proposed for allocation scoring higher. 8.3 Site H(11) is a small site within the Green Belt, currently in use as a car park with a Hall to the rear of the site. The site sits adjacent to a Conservation Area and within relatively close proximity to a Listed Building. The site is bounded either side by housing, with further housing opposite. The SADPD envisages a dwelling capacity of 10 on the site; although the site is well related to the existing settlement, existing housing densities within the immediate area are approximately 30 dwelling per hectare, half that proposed for Site H(11) within the SADPD. 8.4 The site is located opposite an existing access and concerns regarding highway capacity, car parking and safety must be raised in respect to this site. Considering the site's location adjacent the Conservation Area and density of adjacent dwellings, a development of 10 dwellings would be out of character with the surrounding area and contrary to the Core Strategy policies and the requirements of the NPPF. 8.5 In view of the above, the deliverability of the site and its potential to meet the housing need of the District is questioned and it is considered unsuitable for development at this capacity.	Omission of site H(11).	It should be noted that the policy provides an indicative capacity for each housing site. The detailed impact of development on the area would be assessed through the planning application process.	No considered necessary.	change

Site H(12) 33 Baldwins Lane, Croxley Green

SCHEDULE OF REPRESENTATIONS

6002 6/300 14/H1 2/2	Rousebarn Investment Co Ltd	H12	The above sites have been outlined for a limited number of houses ranging between 5 to 30 dwellings on each site. We disagree with this method and argue that it represents a fragmented approach to providing the housing land supply in Croxley Green. We argue that a more comprehensive approach would be beneficial i.e. a larger site that could provide a greater amount of housing together with the opportunity to provide open space.	We suggest an alternative site - Site S(c) Croxley Green land to the north of Little Green Lane for the development of a secondary school, housing and open space. We believe that this would be a more comprehensive approach to the growth of Croxley Green and would provide a well-designed, landscaped scheme that defines a permanent Green Belt boundary.	Site S(c) has not previously been put forward for housing. An assessment of the site has been carried out and it is not a sustainable and appropriate site for mixed use development due to the clear Green Belt boundary that would be breached by development to the north and the loss of good quality agricultural land and open countryside. Site S(c) was subject to consultation for a secondary school in 2010 but following the results of this consultation and of detailed technical work carried out by the County Council the site is not considered appropriate for development of a secondary school. In particular the Council are concerned about the loss of good quality agricultural land and open countryside. Little Green Lane currently forms a clear Green Belt boundary that would be breached by development to the north. The Council are also concerned about the inadequate access to the site from Baldwins Lane, particularly for coaches and buses as highlighted in consultation responses.	No change considered necessary.
6005 3/300 24/H1 2/C	Hertfordshire Biological Records Centre	H12	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6018 8/300 50/H1 2/C	Thames Water Utilities Ltd	H12	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.
6023 3/300 55/H1 2/C	Environment Agency	H12	Redevelopment of the site will definitely require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the current car sales/workshop use of the site. The whole site is in Source Protection Zone 1, meaning that contaminants could reach a public drinking water abstraction point in less than 50 days.	We feel that a comment should be added.	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>

Site H(13) Killingdown Farm Buildings, Croxley Green

SCHEDULE OF REPRESENTATIONS

6002 7/300 14/H1 3/2	Rousebarn Investment Co Ltd	H13	<p>The above sites have been outlined for a limited number of houses ranging between 5 to 30 dwellings on each site. We disagree with this method and argue that it represents a fragmented approach to providing the housing land supply in Croxley Green. We argue that a more comprehensive approach would be beneficial i.e. a larger site that could provide a greater amount of housing together with the opportunity to provide open space.</p>	<p>We suggest an alternative site - Site S(c) Croxley Green land to the north of Little Green Lane for the development of a secondary school, housing and open space. We believe that this would be a more comprehensive approach to the growth of Croxley Green and would provide a well-designed, landscaped scheme that defines a permanent Green Belt boundary.</p>	<p>Site S(c) has not previously been put forward for housing. An assessment of the site has been carried out and it is not a sustainable and appropriate site for mixed use development due to the clear Green Belt boundary that would be breached by development to the north and the loss of good quality agricultural land and open countryside.</p> <p>Site S(c) was subject to consultation for a secondary school in 2010 but following the results of this consultation and of detailed technical work carried out by the County Council the site is not considered appropriate for development of a secondary school. In particular the Council are concerned about the loss of good quality agricultural land and open countryside. Little Green Lane currently forms a clear Green Belt boundary that would be breached by development to the north. The Council are also concerned about the inadequate access to the site from Baldwins Lane, particularly for coaches and buses as highlighted in consultation responses.</p>	No change considered necessary.
6026 8/300 58/H1 3/2	Taylor Wimpey	H13	<p>9.2 We object to the proposed allocation of this site as it is entirely inappropriate for housing; it is poorly related to the existing development in the area and is subject to a number of planning constraints.</p> <p>9.3 The site scores poorly with 718, towards the bottom of the site rankings. Croxley Green is a Key Centre, as defined by the Core Strategy, where approximately 60% of new housing in the plan period should be provided. This site is far from the most appropriate option for new housing within the Key Centres; a number of sites put forward but not proposed for allocation, including Woodside Road, score higher and are far more sustainable / appropriate.</p> <p>9.4 The site is within the Green Belt and is occupied by a number of agricultural buildings. Its agricultural use excludes it from the definition of previously developed land, as defined by the NPPF and as such, the site is greenfield. The site shares a small boundary with existing housing to the south, otherwise it is completely freestanding.</p> <p>Due to its location there is little opportunity to successfully integrate development into the surrounding landscape and any development is likely to have a visual impact on housing areas to the south. There is no evidence that any realistic study into this obvious constraint of the site has been carried out without which the allocation cannot be judged to be justified or sound.</p> <p>9.5 The site is also within the Croxley Green Conservation Area and contains the Grade II Listed Killingdown Farmhouse. In addition, Croxley House, Well House and 1, 2, and 3 Little Green are all Grade II Listed buildings within 200 metres of the site.</p> <p>9.6 Were this site to be developed, it would have to be completely cleared of buildings and hard-standing. There is a possibility the site may be contaminated and this would require appropriate investigation and survey work followed potentially by lengthy remediation work.</p> <p>9.7 The allocation and development of this site would be contrary to the Core Strategy's Spatial Vision (i), Strategic Objective S10, Policy CP1 (criterion f), CP12, Policy PSP2 (criterion l), the requirements of the NPPF. The site should not be allocated as it is not the most appropriate strategy when considered against the reasonable alternatives.</p>	<p>Omission of H(13).</p>	<p>The need for housing within the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt. Greenfield sites have been selected because not sufficient brownfield land is available, or suitable, for development.</p> <p>A defensible boundary could be created to prevent further encroachment to the Green Belt and impacts on the environment could be addressed before and during the planning application stage.</p>	No change considered necessary.
6005 4/300 24/H1 3/C	Hertfordshire Biological Records Centre	H13	<p>No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.</p>	<p>No change required.</p>	<p>Comment noted. The detailed impact of future development would be assessed through the planning application process.</p>	No change required.

SCHEDULE OF REPRESENTATIONS

6014 5/300 39/H1 3/2	Thrive	H13	The original allocation for site H13 (Killingdown Farm, Croxley Green) extended to the boundary of Thrive Homes' stock at Grove Crescent. This is an area of Thrive Homes' existing stock which has considerable scope for remodelling in order to generate a more appropriate mix to meet current needs. This objective would be much easier to achieve if the two sites were coterminous, i.e if the allocated site was increased to the original proposal. We would support that extension.	No change required.	Comment noted.	No change required.
6015 9/300 42/H1 3/2	CPRE Hertfordshire	H13	The proposed Housing Allocation in the Green Belt is not justified. The site is currently occupied by agricultural buildings; it is not Previously Developed Land. The Council's proposed change conflicts with Green Belt policy in the NPPF in that agricultural development is specifically excluded from the definition of Previously Developed Land. The allocation is therefore unsound.	This Housing Allocation should be deleted.	The need for housing within the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt. Greenfield sites have been selected because not sufficient brownfield land is available, or suitable, for development. The detailed impact of future development on the site would be assessed through the planning application process.	No change considered necessary.
6020 4/300 50/H1 3/C	Thames Water Utilities Ltd	H13	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In accordance with Policy CP8 of the Core Strategy and the text in section 5.81 of the Core Strategy developers should either demonstrate that capacity exists both on and off site or that additional capacity can be provided in time to serve the development and that it would not lead to problems for existing or new users.	No change required.	Comment noted.	No change required.
6023 4/300 55/H1 3/C	Environment Agency	H13	Redevelopment of the site will definitely require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the current agricultural use of the site. The whole site is in Source Protection Zone 2, meaning that contaminants could reach a public drinking water abstraction point between 50 - 400 days.	We feel that a comment should be added.	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>

Site H(14) 50-52 New Road, Croxley Green

SCHEDULE OF REPRESENTATIONS

6002 8/300 14/H1 4/2	Rousebarn Investment Co Ltd	H14	The above sites have been outlined for a limited number of houses ranging between 5 to 30 dwellings on each site. We disagree with this method and argue that it represents a fragmented approach to providing the housing land supply in Croxley Green. We argue that a more comprehensive approach would be beneficial i.e. a larger site that could provide a greater amount of housing together with the opportunity to provide open space.	We suggest an alternative site - Site S(c) Croxley Green land to the north of Little Green Lane for the development of a secondary school, housing and open space. We believe that this would be a more comprehensive approach to the growth of Croxley Green and would provide a well-designed, landscaped scheme that defines a permanent Green Belt boundary.	Site S(c) has not previously been put forward for housing. An assessment of the site has been carried out and it is not a sustainable and appropriate site for mixed use development due to the clear Green Belt boundary that would be breached by development to the north and the loss of good quality agricultural land and open countryside. Site S(c) was subject to consultation for a secondary school in 2010 but following the results of this consultation and of detailed technical work carried out by the County Council the site is not considered appropriate for development of a secondary school. In particular the Council are concerned about the loss of good quality agricultural land and open countryside. Little Green Lane currently forms a clear Green Belt boundary that would be breached by development to the north. The Council are also concerned about the inadequate access to the site from Baldwins Lane, particularly for coaches and buses as highlighted in consultation responses.	No change considered necessary.
6005 5/300 24/H1 4/C	Hertfordshire Biological Records Centre	H14	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6018 9/300 50/H1 4/C	Thames Water Utilities Ltd	H14	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.
6023 5/300 55/H1 4/C	Environment Agency	H14	Redevelopment of the site will definitely require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the current car workshop and petrol station use of the site. The whole site is located above a principal aquifer (chalk), which is highly sensitive to contamination.	We feel that a comment should be added.	The Comments section to be amended to include the following sentence: <u>'The whole site is located above a principal aquifer (chalk), which is highly sensitive to contamination. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>	The Comments section to be amended to include the following sentence: <u>'The whole site is located above a principal aquifer (chalk), which is highly sensitive to contamination. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>

Site H(15) Former Yorke Road School, Yorke Road, Croxley Green (conversion)

SCHEDULE OF REPRESENTATIONS

6002 9/300 14/H1 5/2	Rousebarn Investment Co Ltd	H15	The above sites have been outlined for a limited number of houses ranging between 5 to 30 dwellings on each site. We disagree with this method and argue that it represents a fragmented approach to providing the housing land supply in Croxley Green. We argue that a more comprehensive approach would be beneficial i.e. a larger site that could provide a greater amount of housing together with the opportunity to provide open space.	We suggest an alternative site - Site S(c) Croxley Green land to the north of Little Green Lane for the development of a secondary school, housing and open space. We believe that this would be a more comprehensive approach to the growth of Croxley Green and would provide a well-designed, landscaped scheme that defines a permanent Green Belt boundary.	Site S(c) has not previously been put forward for housing. An assessment of the site has been carried out and it is not a sustainable and appropriate site for mixed use development due to the clear Green Belt boundary that would be breached by development to the north and the loss of good quality agricultural land and open countryside.	No change considered necessary.	
6005 6/300 24/H1 5/C	Hertfordshire Biological Records Centre	H15	The buildings support a record of known bat roost, this would need to be considered through the proper legal channels. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.	
6019 8/300 50/H1 5/C	Thames Water Utilities Ltd	H15	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.	
Site H(16) Croxley Station Car Park and Timber Yard							
6005 7/300 24/H1 6/C	Hertfordshire Biological Records Centre	H16	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.	
6023 6/300 55/H1 6/C	Environment Agency	H16	Redevelopment of the site will definitely require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the railway land and current timber yard use of the site. The whole site is in Source Protection Zone 1, meaning that contaminants could reach a public drinking water abstraction point in less than 50 days.	We feel that a comment should be added.	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>	

SCHEDULE OF REPRESENTATIONS

6003 0/300 14/H1 6/2	Rousebarn Investment Co Ltd	H16	The above sites have been outlined for a limited number of houses ranging between 5 to 30 dwellings on each site. We disagree with this method and argue that it represents a fragmented approach to providing the housing land supply in Croxley Green. We argue that a more comprehensive approach would be beneficial i.e. a larger site that could provide a greater amount of housing together with the opportunity to provide open space.	We suggest an alternative site - Site S(c) Croxley Green land to the north of Little Green Lane for the development of a secondary school, housing and open space. We believe that this would be a more comprehensive approach to the growth of Croxley Green and would provide a well-designed, landscaped scheme that defines a permanent Green Belt boundary.	Site S(c) has not previously been put forward for housing. An assessment of the site has been carried out and it is not a sustainable and appropriate site for mixed use development due to the clear Green Belt boundary that would be breached by development to the north and the loss of good quality agricultural land and open countryside.	No change considered necessary.
6013 6/300 39/H1 6/2	Thrive	H16	We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H16 Croxley Green Station.	No change required.	Comment noted.	No change required.
6019 5/300 50/H1 6/C	Thames Water Utilities Ltd	H16	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.
Site H(17) Branksome Lodge, Loudwater Lane, Loudwater						
6003 3/300 17/H1 7/S	Banner Homes Central Ltd	H17	We have a contractual interest in site reference H17 (Branksome Lodge Loudwater). We have previously demonstrated that the site lies in a sustainable location and would result in the logical rounding off of the settlement. The proposed allocation is also considered to comply with the aims and objectives of the recently published NPPF. We would commend the proposed allocation on site H17 to the Inspector.	No change required.	Support welcomed.	No change required.
6005 8/300 24/H1 7/C	Hertfordshire Biological Records Centre	H17	No HBRC ecological information for this site. However, aerial photographs indicate the site contains an area of grassland surrounded by hedgerows that could be of ecological value. An ecological assessment should be provided prior to any approval for development.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6019 2/300 50/H1 7/C	Thames Water Utilities Ltd	H17	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.
Site H(18) Land Rear of The Queens Drive, Mill End						
6005 9/300 24/H1 8/C	Hertfordshire Biological Records Centre	H18	The site lies in an area for which HBRC holds some ecological information. The site currently provides ecological and landscape linkage to the area of open grassland and woodland to the north and more open areas to the south. Any development would need to ensure an ecological corridor is retained to ensure the functionality of this link is maintained.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6014 3/300 39/H1 8/2	Thrive	H18	In addition the following sites share access with Thrive Homes' existing stock, so the argument in favour of co-operation is even stronger: H18 Land at the rear of The Queens Drive, Mill End- Thrive Homes owns 2 pairs of properties which could provide the access point to the site.	No change required.	Comment noted.	No change required.

SCHEDULE OF REPRESENTATIONS

6020 7/300 50/H1 8/C	Thames Water Utilities Ltd	H18	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In accordance with Policy CP8 of the Core Strategy and the text in section 5.81 of the Core Strategy developers should either demonstrate that capacity exists both on and off site or that additional capacity can be provided in time to serve the development and that it would not lead to problems for existing or new users.	No change required.	Comment noted.	No change required.
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Site H(19) Garages Rear of Drillyard, West Way, Rickmansworth

6006 0/300 24/H1 9/C	Hertfordshire Biological Records Centre	H19	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6011 6/300 33/H1 9/2	M Browne	H19	I am concerned about extra housing at Branksome Lodge as Loudwater Lane is extremely narrow and extra traffic would only add to the existing problems there.	Less housing.	The detailed impact of development on the area would be assessed through the planning application process.	No change considered necessary.
6014 6/300 39/H1 9/2	Thrive	H19	Site H19 is a small site which is close to Thrive Homes' existing stock at Mead Place. There is a large area of open space and community buildings between that scheme and the identified site. A master planning exercise of the larger area has the potential to generate a more appropriate mix, plus re-provision of community facilities and amenity space which would benefit the whole area, compared with looking at the small site in isolation.	No change required.	Comment noted.	No change required.

6020 0/300 50/H1 9/C	Thames Water Utilities Ltd	H19	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.
6023 7/300 55/H1 9/C	Environment Agency	H19	Redevelopment of the site is likely to require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the current garage use of the site. Parts of the site are in Source Protection Zone 3, meaning that contaminants could affect the groundwater beneath the site.	We feel that a comment should be added.	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 3. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 3. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>

Site H(20) Long Island Exchange, Victoria Close, Rickmansworth

SCHEDULE OF REPRESENTATIONS

6000 7/300 06/H2 0/2	Mr RMG Baker	H20	I consider the Council's Proposed Site Allocations Document unsound in respect of the proposed re-zoning of the Long Island Hotel site in Rickmansworth for residential development. It will leave Rickmansworth Town Centre without any hotel accommodation.	Remove site H(20).	The site has been identified as a housing site since 2009. It is on previously developed land in a Principal Town with good access to public transport, services and facilities. No significant impact on the environment is anticipated.	No required.	change
6000 1/300 01/H2 0/2	PFV Waters	H20	<p>Object to identification of Long Island Exchange (H20) for housing as:</p> <p>* site is Rickmansworth's only hotel and is often busy shown by volume of traffic and often potential guests referred to B&Bs as no accommodation available. Loss of this amenity would be serious loss to Rickmansworth, not least to Watersmeet when conferences, productions and other events require accommodation for many participants which local B&Bs could not cope with.</p> <p>* Undersand owners told TRDC they wish to dispose of site, but could it have been envisaged that another organisation might wish to run it in the same capacity. It is close to the station and the traffic it generates would surely match that generated by a housing estate, even if the density of about 50 dwellings at most is much less than sought by developers behind the planning application.</p> <p>*Approach road of Victoria Close is narrow at the top end and and unsuitable for any more traffic than it handles at present, particularly given the crossroads at its junction with Nightingale Road very close to that of the A404. The developers' intention to create another access point in Nightingale Place which is a conservation area and only reached from Nightingale Place on an awkward bend is unacceptable for reasons of extra traffic and disturbance to what is at present a quiet cul de sac.</p> <p>* Local amenities of residents surrounding the site would be significantly and adversely affected by any such development. Developers indicated that if application successful they would try to extend site to take in adjacent service station which would make matters worse if acquired for housing, even if forseen in the Site Allocations. Garage owners may resist, but CPO could be employed if thought appropriate.</p>	H20 to be omitted from the Site Allocations.	<p>The site has been identified as a housing site since 2009. It is on previously developed land in a Principal Town with good access to public transport, services and facilities. No significant impact on the environment is anticipated.</p> <p>The detailed impact of development on the area would be assessed through the planning application process.</p> <p>Langleybury and The Grove have been identified as sites for future hotel development in Policy SA7. The policy proposes limited extensions to the existing hotel facilities at The Grove and development of the Langleybury site to include refurbishment, extension and conversion of Langleybury House to hotel use and new hotel/ leisure development.</p>	No considered necessary.	change
6006 1/300 24/H2 0/C	Hertfordshire Biological Records Centre	H20	No HBRC ecological information for this site. Recent ecological survey information does exist for the site as part of an existing planning application for the site. Appropriate design and recommendations should be implemented at the application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change

SCHEDULE OF REPRESENTATIONS

6016 9/300 43/H2 0/2	Rickmansworth Neighbourhood Forum	H20	<p>The Rickmansworth Neighbourhood Forum having consulted with its membership would like to offer the following submission.</p> <p>We object in the strongest terms to the Long Island Exchange site being zoned for housing in the LDF. The repercussions of the Hotels closure on the economic viability and sustainability of the High Street would be major and irreversible.</p> <p>We note that since 1998 a total of 402 units have been built in the town centre, almost exclusively on employment sites. The Three Rivers plan for 1996-2011 required 254 units, Rickmansworth has therefore provided 148 more units for the district than the Three Rivers development plan called for.</p> <p>The issues brought up by the Planning Application for Long Island have cast a spotlight on the economic sustainability of Rickmansworth. As the principle Town of the District it is rapidly moving from the mixed economy that it possessed in 1998 to that of a dormitory town dependant on an underground transport link that is at capacity and cannot be expanded further. A lack of rail capacity and an increasing number of residents trying to commute to work will result in greater use or increasing unemployment.</p> <p>This change to a dormitory Town is not what our members want, it cannot be right that when we are trying to reduce carbon dependency that we are removing all the sites for employment in the town. This change will result in the economically active having to commute further to find work. Secondly the removal of the employment sites will have a serious impact on the viability of the High Street. There are parts of the Town that are completely quiet from 8am to 6pm every working day. The High Street cannot remain viable if local residents can only use it on a Saturday.</p>	Our membership has considered suggesting alternative sites for the 50 units that are presently allocated to the Long Island Site. We do feel that Windrush, Rectory Road and Greville House (Abbeyfield) Chorleywood Close offer some alternative. If this number of 50 units must be met then our membership feels that it must be met from outside Rickmansworth and that it is not our role to suggest sites that other local communities will have views on.	The allocation accords with the Core Strategy requirement to provide additional residential development to 2026. The site is proposed as a housing site on previously developed land in a Principal Town with good access to public transport, services and facilities. No significant impact on the environment is anticipated.	No change considered necessary.
6021 4/300 50/H2 0/C	Thames Water Utilities Ltd	H20	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.
Site H(21) Police Station, Rectory Road, Rickmansworth						
6006 2/300 24/H2 1/C	Hertfordshire Biological Records Centre	H21	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6021 8/300 50/H2 1/C	Thames Water Utilities Ltd	H21	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.
Site H(22) Royal British Legion, Ebury Road, Rickmansworth						
6006 3/300 24/H2 2/C	Hertfordshire Biological Records Centre	H22	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6022 1/300 50/H2 2/C	Thames Water Utilities Ltd	H22	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.
Site H(23) Langwood House, High Street, Rickmansworth						
6006 4/300 24/H2 3/C	Hertfordshire Biological Records Centre	H23	No HBRC ecological information for this site. The southern boundary of the site runs along the town ditch. Appropriate measures to avoid ecological impact will be required at the application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.

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6011 7/300 34/H2 3/2	P Hiscocks	H23	<p>As ward Councillor for Rickmansworth, I object to the inclusion of the Long Island site as a site zoned for housing for the following reasons.</p> <p>The Long Island Exchange is a building of heritage as well as being a local landmark in Rickmansworth. It was built in the 1880s and became The Victoria Hotel which served the adjacent Metroland Rickmansworth Station during this historic period of development. It has changed little from these times apart from the removal of two upper front gables. During the Second World War the proms were staged in the building due to the London bombings. Also Arnold Bax a British composer stayed here please see historical references. Note by Lewis Foreman, joint author of London: a musical gazetteer (Yale University Press, 2005) on the Victoria Hotel, now Long Island Exchange: of the various places in Rickmansworth and Chorleywood to have musical associations, none is more interesting than the Victoria Hotel, for here in 1918 stayed the composer Arnold Bax after he had left his wife, and from where, later, the Henry Wood Promenade Concerts were run during two years of the Second World War. At this time the Proms were run, for the Philharmonic Society, by Keith Douglas, who was a resident of the hotel, when the BBC stopped promoting them.</p> <p>The building is adjacent to two conservation areas and the hotel is at the end of a road in the Nightingale conservation area blending with the Victorian villas and cottages as well as the station opposite.</p> <p>Secondly this is the only hotel in Rickmansworth. It is full most weekends and 85% full during the week. Local companies use this hotel which must add to the attraction of Rickmansworth as a business venue.</p> <p>The hotel guests use the town centre (2 minutes walk away) to shop, eat etc. This must add to the sustainability of the shops and local businesses. The hotel also provides jobs for local people.</p> <p>Thirdly local people don't want this site zoned for housing and they certainly don't want to lose the historical local landmark and their only hotel. Enclosed petition with nearly 1,000 names plus letters of support received. The community has a voice and it has spoken. The petition signed by 919 people asks that Long Island hotel be saved and thereby taken out of a zoned planning plot. I have received many letters and emails some of which I also attach.</p> <p>Realising that another site must be found for these 50 allocated dwellings I would like to propose the following:</p> <p>Grenville House (Abbyfield), Chorleywood Close – 15 dwellings. This plot has been derelict and empty for two years and would easily convert into flats.</p> <p>Windrush, Rectory Road a net gain of 10 homes is already being built and should be included in the plan.</p> <p>Travis Perkins Church Street 25 starter homes which would be a much better alternative producing a more varied form of housing as opposed to more flats, so crucial to the vitality of the town centre. This business could be relocated in to Tolpits Lane Business Park as it is mainly used by the trade.</p>	Omission of site H(23).	<p>The allocation accords with the Core Strategy requirement to provide additional residential development to 2026. The site is proposed as a housing site on previously developed land in a Principal Town with good access to public transport, services and facilities. No significant impact on the environment is anticipated.</p> <p>The detailed impact of development on the area would be assessed through the planning application process.</p> <p>Langleybury and The Grove have been identified as sites for future hotel development in Policy SA7. The policy proposes limited extensions to the existing hotel facilities at The Grove and development of the Langleybury site to include refurbishment, extension and conversion of Langleybury House to hotel use and new hotel/ leisure development.</p> <p>Windrush is included in the housing supply figures as there is an existing planning permission. Travis Perkins and Abbey House have not been put forward as housing sites and are therefore not deliverable.</p>	No change considered necessary.
6011 5/300 33/H2 3/2	M Browne	H23	<p>I wish to object strongly against the demolition of Long Island Exchange for the use of housing/flats. Not only would this cause extra traffic congestion in an already very busy area, but a hotel has been and needs to continue to be the hub of the community. It is also convenient for business persons and visitors, giving easy access to Wembley and London.</p>	Omission of site H(23).	<p>The site has been identified as a housing site since 2009. It is on previously developed land in a Principal Town with good access to public transport, services and facilities. No significant impact on the environment is anticipated.</p> <p>The detailed impact of development on the area would be assessed through the planning application process.</p> <p>Langleybury and The Grove have been identified as sites for future hotel development in Policy SA7. The policy proposes limited extensions to the existing hotel facilities at The Grove and development of the Langleybury site to include refurbishment, extension and conversion of Langleybury House to hotel use and new hotel/ leisure development.</p>	No change considered necessary.

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6021 0/300 50/H2 3/C	Thames Water Utilities Ltd	H23	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In accordance with Policy CP8 of the Core Strategy and the text in section 5.81 of the Core Strategy developers should either demonstrate that capacity exists both on and off site or that additional capacity can be provided in time to serve the development and that it would not lead to problems for existing or new users.	No change required.	Comment noted.	No change required.	
6015 4/300 41/H2 3/2	Rickmansworth Residents' Association	H23	The problem has been highlighted by the fact that the recent planning application for Site H23, Long Island Exchange, has been submitted with a proposed housing density that is over twice the, already high, density proposed in the Site Allocations Document. Clearly the suggested housing densities in the site allocations document will be regarded, by developers, as a baseline on which to base bids for even higher densities.	No change required.	The dwelling capacity is an indicative figure based on the site area.	No change required.	
6023 8/300 55/H2 3/C	Environment Agency	H23	Further explanation of the 8m buffer is required (e.g. undeveloped, planted with native species) as indicated in our covering letter.	We feel that a comment should be added.	The Comments section states that a 'Minimum 8m buffer must be provided to Town Ditch'. No further detail is considered necessary.	No change considered necessary.	
Site H(24) Gas Works, Salters Close, Rickmansworth							
6006 5/300 24/H2 4/C	Hertfordshire Biological Records Centre	H24	The site lies close to the CWS Croxley Hall Lakes (ref: 89/028). Any application would need to be supported by adequate ecological survey, consideration of impacts to surrounding habitats (which form part of a Key Biodiversity Area (KBA)) and include appropriate buffer zones and any other required measures to mitigate impacts identified.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.	
6020 1/300 50/H2 4/C	Thames Water Utilities Ltd	H24	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In accordance with Policy CP8 of the Core Strategy and the text in section 5.81 of the Core Strategy developers should either demonstrate that capacity exists both on and off site or that additional capacity can be provided in time to serve the development and that it would not lead to problems for existing or new users.	No change required.	Comment noted.	No change required.	
6023 9/300 55/H2 4/C	Environment Agency	H24	<p>Redevelopment of the site will definitely require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the gas works currently on the site. The whole site is in Source Protection Zone 1, meaning that contaminants could reach a public drinking water abstraction point in less than 50 days.</p> <p>The Flood Risk Assessment comment should be expanded or a new comment should be added to indicate that further works are likely to be required as part of any redevelopment to increase the height of the Chess Wall flood defence, plus any floodplain compensation works linked with this. These works are identified as being required in the Level 2 Strategic Flood Risk Assessment (prepared by Halcrow for Three Rivers District Council, 2012).</p> <p>Also, because of the residual flood risk of development behind a flood defence, the Flood Risk Assessment will also need to include details of how residents will get adequate warning and be able to access and escape from the site in the event that the flood defence fails.</p> <p>We are unsure whether the site allocation will be developable as one piece of land given that a good proportion of the site has been unallocated to take it out of flood zone 3 to allow residential development.</p>	We feel that a comment should be added.	<p>The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u></p> <p>The Comments section states that a: 'Flood risk assessment would be required to support planning applications on the site.' No further detail is considered necessary.</p>	<p>The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u></p>	

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Site H(25) Bridge Motors, Church Street, Rickmansworth

6006 6/300 24/H2 5/C	Hertfordshire Biological Records Centre	H25	No HBRC ecological information for the site. The site lies adjacent to an area of woodland. Appropriate design and a buffer required at application stage to avoid ecological impacts.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6014 7/300 39/H2 5/2	Thrive	H25	Site H25 Bridge Motors, Church Street, is opposite a Thrive Homes' existing stock at St Mary's Court, which has been identified as a potential site for redevelopment within our Asset Management Strategy and it may be possible to link the two.	No change required.	Comment noted.	No change required.
6019 3/300 50/H2 5/C	Thames Water Utilities Ltd	H25	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.
6024 0/300 55/H2 5/C	Environment Agency	H25	Further explanation of the 5m buffer is required (e.g. undeveloped, planted with native species) as indicated in our covering letter. Redevelopment of the site will definitely require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the car workshop/sales current use of the site. The whole site is in Source Protection Zone 1, meaning that contaminants could reach a public drinking water abstraction point in less than 50 days. We are unsure whether the site allocation will be developable as one piece of land given that a good proportion of the site has been unallocated to take it out of flood zone 3 to allow residential development.	We feel that a comment should be added.	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u> The Comments section states that a: 'Minimum of 5m buffer must be provided to ditch on site.' No further detail is considered necessary.	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>

Site H(26) Depot, Harefield Road, Rickmansworth

6006 7/300 24/H2 6/C	Hertfordshire Biological Records Centre	H26	No HBRC ecological information for the site. The site lies adjacent to the canal, that forms part of a KBA and close to a CWS Rickmansworth Aquadrome (ref: 89/014) which inter alia is an important site for birds. Appropriate design and a buffer zone to avoid impact to the adjacent habitats including the canal as an important 'green link' through the area.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6018 7/300 50/H2 6/C	Thames Water Utilities Ltd	H26	Thames Water have a pumping station in the middle of this site and sewers for adoption recommends that development should not be constructed with 10m of a pumping station. Developers will need to give consideration to noise vibration and odour from the pumping station to ensure that the amenity of future occupiers of the site will not be adversely affected.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6024 1/300 55/H2 6/C	Environment Agency	H26	Further explanation of the 8m buffer is required (e.g. undeveloped, planted with native species) as indicated in our covering letter. Redevelopment of the site will definitely require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the depot current use of the site. The whole site is in Source Protection Zone 1, meaning that contaminants could reach a public drinking water abstraction point in less than 50 days. We are unsure whether the site allocation will be developable as one piece of land given that a good proportion of the site has been unallocated to take it out of flood zone 3 to allow residential development.	We feel that a comment should be added.	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u> The Comments section states that a: 'Minimum of 5m buffer must be provided to ditch on site.' No further detail is considered necessary.	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u>

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Site H(27) Depot, Stockers Farm Road, Rickmansworth

6006 8/300 24/H2 7/2	Hertfordshire Biological Records Centre	H27	The site includes a section of the CWS Stockers Farm Meadow (ref: 89/009) an ancient water meadow of ecological value. Unless it can be demonstrated that this area supports no ecological interest in the context of the wildlife site, HBRC objects to the loss of this section of water meadow. Please note that the 'Site Allocations Local Development Document, Proposed Submission – November 2012' states 'site near to wildlife site' this is incorrect as the boundary includes a part of the wildlife site.	Amend comments section of site H(27).	The Council confirms that a section of site H(27) is within a wildlife site. The detailed impact of future development on the wildlife site would be assessed through the planning application process.	Amend the comments section of site H(27) to read 'Part of site within a wildlife site'.
6016 0/300 42/H2 7/2	CPRE Hertfordshire	H27	The proposed Housing Allocation includes Green Belt land that has not previously been developed. The allocation should be restricted to the land currently occupied by buildings or storage hardstanding. The field to the western end of the site should remain open land. The Council's proposed change conflicts with Green Belt policy in the NPPF and is therefore unsound.	The proposed Housing Allocation should be amended to exclude the open field to the western end of the site allocation boundary and be restricted to the area of Previously Developed Land.	It is not considered appropriate to amend site H(27) to only include previously developed land. The need for housing within the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt. Greenfield sites have been selected because not sufficient brownfield land is available, or suitable, for development. The detailed impact of future development on the site would be assessed through the planning application process.	No change considered necessary.
6019 6/300 50/H2 7/C	Thames Water Utilities Ltd	H27	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.
6024 2/300 55/H2 7/C	Environment Agency	H27	Further explanation of the 5m buffer is required (e.g. undeveloped, planted with native species) as indicated in our covering letter. Redevelopment of the site will definitely require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the depot current use of the site. The whole site is in Source Protection Zone 2, meaning that contaminants could reach a public drinking water abstraction point in between 50 - 400 days.	We feel that a comment should be added.	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u> The Comments section states that a: 'Minimum of 5m buffer must be provided to ditch on site.' No further detail is considered necessary.	The Comments section to be amended to include the following sentence: <u>'The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u> The Comments section states that a: 'Minimum of 5m buffer must be provided to ditch on site.' No further detail is considered necessary.

Site H(28) Land South of Tolpits Lane

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6000 3/300 03/H2 8/2	Mrs B Jenkins	H28	<p>Request removal of land at Little Tolpits Cottage from site H28. This land has nothing to do with Merchant Taylors and could affect property value if we were to sell.</p> <p>H28 is designated Green Belt with Tree Preservation Orders on most of the trees in the area highlighted. When we applied for a single storey extension recently, were informed we would have to provide an archaeological team on site as prehistoric and Roman remains have been found along the bank of the river and therefore any building work is likely to have a significant impact on archaeological remains as all along the bank of the Rivers Colne there are prehistoric sites.</p> <p>Utilising existing empty buildings and previously disused land should be the priority areas for building, not destroying areas of natural and historical beauty.</p> <p>This area is prone to flooding, some of the area highlighted is actually a flood plain and as history has proved building on flood plains is a recipe for future problems.</p> <p>Tolpits Lane is already struggling to cope with traffic volume. I have written several times to the Highways department highlighting problems of the road. After several instances recently and 2 deaths (the road has had to be closed 3 times in the last month) I have run out of patience with them. There are no pavements for the numerous people walking to the industrial estates, no street lighting which makes the road very dark and dangerous in the winter and no public transport for the road as it is too narrow. Along the area highlighted the national speed limit is in force. Any local who uses the road regularly will be aware how dangerous it is.</p> <p>Strongly oppose development along this road.</p>	<p>Remove Little Tolpits Cottage from H28 site boundary.</p> <p>Remove site H28.</p>	<p>The comment regarding removing Little Tolpits Cottage from the H28 site boundary is noted.</p> <p>The need to provide housing in the District and the absence of alternative deliverable non-Green Belt sites (as demonstrated by local evidence) may constitute very special circumstances which would be required for development to take place in the Green Belt.</p> <p>The site is a Greenfield Green Belt site, however a defensible boundary could be created to prevent further encroachment.</p> <p>Part of the site is located within a Floodzone however there is scope for development to avoid this area. Furthermore a flood risk assessment would be required to support planning applications on the site.</p> <p>The detailed impact of development on the area would be assessed through the planning application process.</p>	<p>Site boundary amended to exclude Little Tolpits Cottage.</p>
6006 9/300 24/H2 8/2	Hertfordshire Biological Records Centre	H28	<p>The site includes a section of the CWS Hamper Mill Lakes (Ref 89/004) and lies within a KBA. There is some evidence to suggest that the grassland within the allocated site is improved, however the CWS supports an important complex of semi-natural habitat associated with the River Colne that forms an important green link through the area. Records of a number of protected species also present. Unless it can be demonstrated that the area supports no ecological interest, HBRC objects to development on this site.</p>	<p>No change required.</p>	<p>The detailed impact of future development on the wildlife site would be assessed through the planning application process.</p>	<p>No change considered necessary.</p>
6012 7/300 37/H2 8/S	Merchant Taylors Company	H28	<p>We support allocation H(28). The site was previously identified as Site H(31) within the draft Site Allocations Development Plan Document. It is considered that the proposed designation of this site is sound.</p> <p>Legally Compliant: The proposed designation of this site follows its identification as a potential housing site through the preparation of the Core Strategy as part of the consideration of strategic housing requirements and available sites to ensure sufficient supply as required by national planning policy.</p> <p>The preparation of the document, and the allocation of this site, has had regard to national policy, whilst The East of England Regional Spatial Strategy (RSS) has now been abolished (as of 11 December 2012).</p> <p>Soundness: The proposed document has been positively prepared as following the preparation of the development strategy for the District as set out in the adopted Core Strategy. Policy SA1 appropriately sets out the approach to residential development and the identification of specific allocations to ensure an appropriate supply of housing land is available. The sites put forward within the Site Allocations Document have been established to meet the housing requirements identified as part of the preparation of that document and have been subject to previous consultation. It is considered that the identification of Site H(28) as a housing site with a capacity of 50 dwellings is justified as part of the overall review of housing sites undertaken. This underutilised area of land is suitable for housing and is an available and deliverable residential site. Whilst the site is currently open land, residential use is established with six existing residential properties located across the site. It is suitable to assist meet the housing requirements of the district, which the Core Strategy confirms can not all be achieved on previously developed land. The land to the north of Tolpits Lane is developed and the site is contained from the open fields of Merchant Taylors' School to the south by the River Colne and Hampermill Lake on the southern boundary of the proposed allocation. As such the land is not located within an area of open countryside.</p> <p>Whilst part of the allocation includes an area of wildlife site it is evident that the proposed development of 50 residential dwellings can be achieved with the provision of sufficient mitigation and provision of enhanced habitats within a scheme to avoid adverse impact. The development will need to be set back from the River Colne, which provides the greatest areas of biodiversity and wildlife</p>	<p>No change required.</p>	<p>Support welcomed.</p>	<p>No change required.</p>

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interest, to ensure that the future housing is located outside of the part of the site within Flood Zone 3 (which represents only 12% of the land area adjacent to the river to the south). An SFRA has been completed which identifies that 84% of the land is in Flood Zone 1 and 88% in Flood Zone 1 and 2, which is confirmed by national planning policy as suitable for housing development. As such there are no in principle flood risk issues related to the development of 50 units within this site.

This site has potential to accommodate 50 dwellings across this area, and also offers the opportunity to refurbish the existing listed Tolpits House located within the site, delivering heritage benefits. Enclosed is a plan demonstrating how the site has the potential to accommodate 50 residential units through the appropriate conversion of Topits House and Lodge to provide 7 apartments and provision of 43 dwellings. There are no constraints to the delivery of this site for residential development in the short term to provide new dwellings and therefore it the plan is effective in this regard. The main developable land area is all within a single ownership and is currently vacant, with existing access to Tolpits Lane. There are no issues in relation to contamination and therefore there is the potential for the site to be bought forward for development earlier within the plan period.

6016 1/300 42/H2 8/2	CPRE Hertfordshire	H28	<p>Institutions in large grounds are appropriate in the Green Belt and re-use of land which contains buildings and permanent structures such as institutional buildings are defined in the NPPF as Previously Developed Land. However in that definition it expressly states that this can include "the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) (our emphasis). In this case the allocation is making a mockery of the definition of previously developed land by including the extensive undeveloped open land along the River Colne.</p> <p>The Council's proposed change conflicts with Green Belt policy in the NPPF and is therefore unsound.</p>	<p>This housing allocation should be limited to the area of Previously Developed Land only and therefore reduced in size drastically leaving the remaining land along the river open.</p>	<p>It is not considered appropriate to amend site H(28) to only include previously developed land. The need for housing within the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt. Greenfield sites have been selected because not sufficient brownfield land is available, or suitable, for development.</p> <p>The detailed impact of future development on the site would be assessed through the planning application process.</p>	<p>No change considered necessary.</p>
6020 8/300 50/H2 8/C	Thames Water Utilities Ltd	H28	<p>On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.</p>	<p>No change required.</p>	<p>Comment noted.</p>	<p>No change required.</p>
6024 3/300 55/H2 8/C	Environment Agency	H28	<p>Further explanation of the 8m buffer is required (e.g. undeveloped, planted with native species) as indicated in our covering letter.</p> <p>A large part of this allocation is within the Hamper Mill Lakes Local Wildlife Site. We have carried out extensive works in this area in recent years, including works to the River Colne, the removal of a weir, creation of backwaters and enhancements to the planting at the site. We would not support any development proposals that have a negative impact upon the habitats and wildlife at the site, and any loss of biodiversity across the site would go against national and local policies. We would expect any development to be focused at the least sensitive parts of the site to the east and west of the allocation site.</p> <p>In order to comply with European, national and local policies (including the Water Framework Directive), we would recommend that any development is sensitive to it's surroundings and does not have a detrimental impact upon the local biodiversity. The integrity of the Local Wildlife Site must be maintained.</p> <p>We would strongly support a green corridor to link the Hamper Mill Lakes site to the Croxley Common Moor to the north of the site.</p>	<p>We feel that a comment should be added.</p>	<p>Comment noted. The Comments section states that 'Site includes area of wildlife site. Measures to avoid adverse impacts will need to be provided by developers, supported by adequate ecological survey.' Further comments are not considered necessary as the detailed impact of future development would be assessed through the planning application process.</p>	<p>No change considered necessary.</p>

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6026 9/300 58/H2 8/2	Taylor Wimpey	H28	<p>10.2 We object to the proposed allocation of this site for housing development as it is completely unsuitable for housing as well as being subject to a number of planning constraints.</p> <p>10.3 The site scores 471 in the housing site overall scores, one from the bottom of the ranking. Every proposed allocation and all but one other site submitted but not proposed for allocation scores higher. In total, 67 sites not proposed for allocation score higher. A cursory look at the site and its surroundings suggests it is unsuitable for housing and this is reflected in its very poor score. In light of the proposed allocation of this site despite its low score raises questions with regards the value of scoring each site, if these scores are to be completely ignored and consequently the overall soundness of the plan based on the lack of justification for the choice of sites proposed.</p> <p>10.4 Development of this site would result in the loss of approximately 7 hectares of Green Belt land, the majority of which is greenfield; the site at Woodside Road proposes only 4.25ha of residential development currently in the Green Belt. In terms of existing housing development, the site is completely isolated. It has no accessibility to local shops, schools (primary or secondary), health facilities or community facilities.</p> <p>10.5 It is contained to the south by the River Colne and a small lake, to the west by a railway line and to the north by an industrial area. Appendix 2a of the Sustainability Appraisal lists a number of site constraints including, but not limited to:</p> <ul style="list-style-type: none"> · Listed Buildings (plural) within the site boundary; · Partly within Flood Zone 2; · Wildlife sites (plural) within the site boundary; · Close proximity to a SSSI. <p>10.6 The site's proximity to the Moor Park Industrial Centre raises concerns over highway impact, access to the site and potential impact on residential amenity (noise and air pollution).</p> <p>10.7 The site is clearly unsuitable for housing, a fact that is recognised by the Council itself in the site's score. Development of the site would be contrary to a number of policies within the Core Strategy and within National Policy. The deliverability of the site and its potential to meet the housing need of the District must also be questioned. Overall, it should not be allocated as it is not justified and renders the Plan unsound.</p>	Omission of site H(28).	<p>The need for housing within the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt. Greenfield sites have been selected because not sufficient brownfield land is available, or suitable, for development.</p> <p>A defensible boundary could be created to prevent further encroachment to the Green Belt and impacts on the environment could be addressed before and during the planning application stage.</p>	No change considered necessary.
6017 4_30 045_ H28_ 2	HCC Minerals and Waste	H28	<p>The proposed housing allocation on land south of Tolpits Lane (ref:H(28)) is located immediately south of land identified as an employment land area of search (ELAS212) in the county council's Proposed Submission Waste Site Allocations document. Although no waste management facilities are currently located within this employment area, its designation means that its existing uses may be compatible with waste management uses that could come forward in the future.</p>	No change required.	Comment noted	No change required.

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6001 5/300 09/H2 9/C	Thomas Pocklington Trust	H29	The recognition of the site's development potential and its allocation in the DPD is supported, subject to the following commentary on deliverability. My client has reappraised the site and considers that it can come forward in the immediate timeframe of 2012-2015 (the DPD currently states 2016-2020). We seek for the DPD to be amended accordingly. This will ensure maximum effectiveness in accordance with meeting the tests of soundness.	Phasing for H29 to be amended to 2012-2015	It is not considered appropriate to bring forward the phasing period because time is required to find a suitable replacement for a care home and to obtain planning permission for new housing at the site. The phasing of allocations is designed to enable a continuous and deliverable 5 year supply of housing land throughout the District over the whole of the plan period. It takes into account information about the availability of sites, the provision of infrastructure, and the need to phase delivery over the whole plan period.	No considered necessary.	change
6007 0/300 24/H2 9/2	Hertfordshire Biological Records Centre	H29	No HBRC ecological information for this site. Site lies adjacent to an area of woodland. Appropriate design and landscaping required at application stage to protect this woodland.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change
6021 7/300 50/H2 9/C	Thames Water Utilities Ltd	H29	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No required.	change
Site H(30) The Fairway, Green Lane, Oxhey Hall							
6007 1/300 24/H3 0/C	Hertfordshire Biological Records Centre	H30	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change
6015 2/300 41/H3 0/2	Rickmanswor th Residents' Association	H30	The revised document takes no cognisance of the fact that the proposed housing density in certain sites directly contradicts Development Management Policies DPD Policy DM1 which states: The Council will seek to 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. Development will only be supported where it can be demonstrated that the proposal will not result in: -The generation of excessive levels of traffic or - Layouts unable to maintain the particular character of the area in the vicinity of the application site in terms of plot size, plot depth, building footprint, plot frontage width, frontage building line, height, gaps between buildings and streetscape features (e.g. hedges, walls, grass verges etc.) The developments proposed for such sites as that in Harefield Road and Stockers Farm Road (H30 and H31) have a suggested housing density that is clearly in conflict with Policy DM1 and yet there has been no amendment to the draft Site Allocations Document issued earlier in the year. The Association continues to believe that the housing density on these two sites should not exceed 25 to 30 dwellings per hectare (10 to 12 dwellings per acre).	No change required.	Site H(30) currently accommodates a residential home and site H(31) accommodates a social club. Therefore housing on these sites would not be forms of 'backland' or 'infill' development, they would be brownfield sites suitable for redevelopment. The sites are located in a Secondary site and Key Centre respectively with good access to public transport, services, facilities and open space. No significant impact on the environment is anticipated. Consequently the sites are considered appropriate and sustainable.	No required.	change
6022 3/300 50/H3 0/C	Thames Water Utilities Ltd	H30	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No required.	change

SCHEDULE OF REPRESENTATIONS

6025 6/300 57/H3 0/C	Hertfordshire County Council	H30	This site is currently in use as an elderly persons home (EPD) which is considered to be in need of redevelopment due to the age and condition of the property. Redevelopment would involve temporarily decanting residents to alternative locations, whilst construction occurs, which is not appropriate for this client group. As a result, HCC's model of provision is where possible, to redevelop on new sites and move residents once construction is complete. A site has been identified; the Former Little Furze school, which is described below. HCC hopes to work with a social housing provider to secure a new elderly persons development at the former Little Furze school. Redevelopment of The Fairway site for residential use (Use class C3) is considered to be a suitable alternative use. Disposal of this site will secure much needed capital receipts which may be used to help fund a new elderly persons home at the alternative location. Maximum capital receipts would be secured if it was agreed by TRDC that sufficient community benefits are offered by this proposal, such that affordable housing is not a requirement of redevelopment at The Fairway.	Use of the Former Little Furze School as a elderly persons home.	The Comments section of site H(30) states that the site depends on alternative care provision being made before it could provide housing. Little Furze School has been identified as a housing site with a dwelling capacity of one hundred units and these may include older persons accommodation.	No considered necessary.	change
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Site H(31) Crescent Club, Hallows Crescent, South Oxhey

6007 2/300 24/H3 1/C	Hertfordshire Biological Records Centre	H31	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change
6013 7/300 39/H3 1/2	Thrive	H31	We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H31 Crescent Club, South Oxhey.	No change required.	Comment noted.	No required.	change
6015 3/300 41/H3 1/2	Rickmansworth Residents' Association	H31	The revised document takes no cognisance of the fact that the proposed housing density in certain sites directly contradicts Development Management Policies DPD Policy DM1 which states: The Council will seek to 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. Development will only be supported where it can be demonstrated that the proposal will not result in: -The generation of excessive levels of traffic or - Layouts unable to maintain the particular character of the area in the vicinity of the application site in terms of plot size, plot depth, building footprint, plot frontage width, frontage building line, height, gaps between buildings and streetscape features (e.g. hedges, walls, grass verges etc.) The developments proposed for such sites as that in Harefield Road and Stockers Farm Road (H30 and H31) have a suggested housing density that is clearly in conflict with Policy DM1 and yet there has been no amendment to the draft Site Allocations Document issued earlier in the year. The Association continues to believe that the housing density on these two sites should not exceed 25 to 30 dwellings per hectare (10 to 12 dwellings per acre).	No change required.	Site H(26) and site H(27) are both edge of settlement sites and therefore housing on these sites would not be forms of 'backland' or 'infill' development, they would be brownfield sites suitable for redevelopment. They are both within the principal town which has good access to public transport, services, facilities and open space. Consequently the sites are considered appropriate and sustainable. The detailed impact of future development would be assessed through the planning application process.	No required.	change

6019 4/300 50/H3 1/C	Thames Water Utilities Ltd	H31	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No required.	change
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Site H(32) Former Jet Public House, Hayling Road, South Oxhey

6007 3/300 24/H3 2/C	Hertfordshire Biological Records Centre	H32	No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change
6013 8/300 39/H3 2/2	Thrive	H32	We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H32 Jet Public House, South Oxhey.	No change required.	Comment noted.	No required.	change
6019 7/300 50/H3	Thames Water Utilities Ltd	H32	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No required.	change

SCHEDULE OF REPRESENTATIONS

2/C

Site H(33) Little Furze School, South Oxhey

6007 4/300 24/H3 3/C	Hertfordshire Biological Records Centre	H33	The site is bounded on three sides by the CWS and Local Nature Reserve (LNR) Oxhey Woods (ref: 90/006). This is considered an important woodland at the county level. Consideration should be given to the potential increased disturbance issues on this woodland by the development of 100 dwellings over the site's existing use as a primary school. HBRC hold no ecological data for the site itself but the grassland on-site may hold botanical interest. A full ecological assessment will be required and measures to protect the adjacent woodland from ecological impacts such as buffers will be required.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change
6013 9/300 39/H3 3/2	Thrive	H33	We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H33 Little Furze School, South Oxhey.	No change required.	Comment noted.	No required.	change
6021 3/300 50/H3 3/C	Thames Water Utilities Ltd	H33	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In accordance with Policy CP8 of the Core Strategy and the text in section 5.81 of the Core Strategy developers should either demonstrate that capacity exists both on and off site or that additional capacity can be provided in time to serve the development and that it would not lead to problems for existing or new users.	No change required.	Comment noted.	No required.	change
6024 4/300 55/H3 3/C	Environment Agency	H33	We would expect the highest standards of water discharges from any redevelopment of this site. The adjacent Oxhey Woods Local Nature Reserve is known to have a number of issues (springs), and areas of wet woodland. As such, it is imperative that the quality of water entering the woods is of sufficiently good quality not to impact on the biodiversity of the site.		Comment noted. The Comments section states that 'Site includes area of wildlife site. Measures to avoid adverse impacts will need to be provided by developers, supported by adequate ecological survey.' Further comments are not considered necessary as the detailed impact of future development would be assessed through the planning application process.	No considered necessary.	change
6025 7/300 57/H3 3/C	Hertfordshire County Council	H33	This site comprises a former infants and junior school which was closed in December 2004, having been identified as being surplus to requirements by HCC's Children's Services directorate. It has since been identified for reuse by HCC as a replacement elderly persons /care home. It is probable that not all of the site will be required for this purpose and that proposals will be also made for residential development (Use class C3). The capital receipt from disposal of this part of the site may be used to fund the replacement EPD. HCC has made representations identifying that demand for school places is likely to increase in the South Oxhey area as a result of proposals for residential development. If demand for school places grows significantly, there are opportunities to expand nearby primary schools. Furthermore, St Josephs Primary school, which is located nearby has been identified as having potential to expand, including use of land to the south of the school, which is not currently part of the school, but is owned by HCC.	No change required.	Comment noted.	No required.	change

SCHEDULE OF REPRESENTATIONS

6027 0/300 58/H3 3/2	Taylor Wimpey	H33	<p>11.2 We object to the inclusion of this site as it is subject to a number of planning constraints. The site is within the Green Belt but unlike the site at Woodside Road, only borders existing areas of housing along one boundary (the site is ranked below Woodside Road in the housing site scores). Although the site is not considered to be „freestanding“, it is poorly related to existing development in the area. The site has been identified as previously developed in Appendix 2a of the Sustainability Appraisal, although due to its former use as a primary school, the majority of the site has not been subject to any intrusive groundworks, being school playing fields.</p> <p>11.3 The site is surrounded on three sides by the Oxhey Woods Local Nature Reserve and Wildlife Site. Development of the site would have a serious detrimental affect on the LNR and the Green Belt. Housing development is clearly not appropriate on any land almost completely surrounded by designated sites of ecological importance when less constrained alternatives exist and as such, the site should not be taken forward. An alternative site should be allocated within the Key Centres to ensure the housing requirement for the District is met.</p>	Omission of site H(33) and allocation of a new housing site within a Key Centre.	<p>The need for housing within the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt. Greenfield sites have been selected because insufficient brownfield land is available, or suitable, for development.</p> <p>The Council has sought submission of potential housing sites for consideration since 2008. There may be sites that have the potential for future development but it is not possible to allocate and include all potential housing sites within the site allocations document.</p> <p>The detailed impact of development on the area would be assessed through the planning application process.</p>	No considered necessary.	change
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Site H(34) Amenity Space Maylands Road/Ferndown Road, South Oxhey

6019 1/300 50/H3 4/C	Thames Water Utilities Ltd	H34	<p>We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In accordance with Policy CP8 of the Core Strategy and the text in section 5.81 of the Core Strategy developers should either demonstrate that capacity exists both on and off site or that additional capacity can be provided in time to serve the development and that it would not lead to problems for existing or new users.</p>	No change required.	<p>The Council notes that the phasing period is 2016-2020 and the detailed impact of future development would be assessed through the planning application process.</p>	No required.	change
6007 5/300 24/H3 4/C	Hertfordshire Biological Records Centre	H34	<p>No HBRC ecological information for this site. Appropriate design and landscaping required at application stage.</p>	No change required.	<p>Comment noted. The detailed impact of future development would be assessed through the planning application process.</p>	No required.	change
6014 0/300 39/H3 4/2	Thrive	H34	<p>We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H34 Maylands Road, South Oxhey: We note the requirement to relocate the play equipment to Moortown Road, however, Thrive Homes are relocating play equipment to the Moortown Road site as part of the purchase of land in Otley Way.</p>	No change required.	<p>Comment noted.</p>	No required.	change

Site H(35) South Oxhey Town Centre

SCHEDULE OF REPRESENTATIONS

6025 8/300 57/H3 5/C	Hertfordshire County Council	H 3 5	The South Oxhey Town Centre area includes several sites which are owned by HCC. We look forward to working closely with TRDC to ensure that all current and future Service needs are met, in order that the local community is adequately served. Part of the Northwick road site (Anson House) is vacant. It is intended that Anson House/ Northwick day Centre (which is still in use, currently) , would be redeveloped for housing , possibly including a " Flexi-care scheme". The day centre may/ would need to be re-provided either on site or elsewhere.	No change required.	Comment noted.	No change required.
6007 6/300 24/H3 5/C	Hertfordshire Biological Records Centre	H 3 5	The site including the Police Station lies adjacent to Pond Wood a CWS (ref: 90/10) an ancient semi-natural woodland. Consideration should be given to buffer creation and appropriate management to avoid ecological impacts to this woodland. Protected species records.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6014 8/300 39/H3 5/2	Thrive	H 3 5	Site H35/ South Oxhey Town Centre is obviously an area in which Thrive Homes has a keen interest. We have been participating in the Steering Group and Project Group for the South Oxhey Initiative and whilst discussions have stopped, are keen to continue discussions on this project.	No change required.	Comment noted.	No change required.
6022 2/300 50/H3 5/C	Thames Water Utilities Ltd	H 3 5	We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity in this area is unlikely to be able to support the demand anticipated from this development. It will be necessary for us to undertake investigations into the impact of the development and completion of this, on average, takes 12 weeks. It should be noted that in the event of an upgrade to our assets being required, up to three years lead in time will be necessary. In accordance with Policy CP8 of the Core Strategy and the text in section 5.81 of the Core Strategy developers should either demonstrate that capacity exists both on and off site or that additional capacity can be provided in time to serve the development and that it would not lead to problems for existing or new users.	No change required.	Comment noted.	No change required.
6027 1/300 58/H3 5/2	Taylor Wimpey	H35		We object to the proposed broad area allocation of South Oxhey on the grounds that there is no justification or explanation as to how a dwelling capacity of 280 dwellings, which has been revised upwards from 210 since the January 2012 consultation, has been reached. The Site Allocations Supporting Information Report November 2012 still identifies the site as having a capacity for 210 dwellings. Whilst we support the principle of urban regeneration, in the absence of clear, justified, evidence of capacity the Council are in danger of failing to meet the housing requirements of the Core Strategy and in addition, any sites that did come forward could not be relied upon to provide the affordable housing that the Core Strategy recognises is a priority for the area. As such, the SADPD is not in conformity with the Core Strategy. The Plan is therefore unsound because it fails to evidence the likely delivery from the regeneration area(s).	Further consultation on the masterplan for South Oxhey took place in May 2012 on the basis of additional capacity work and identified the capacity of 280 dwellings in the South Oxhey town centre. Appendix 2 of the Annual Monitoring Report (2012) sets out an assessment of whether Three Rivers has a five year supply of deliverable sites for housing. This assessment has been completed in accordance with the NPPF and includes a 5% buffer and shows that Three Rivers does have a five year supply. NPPF paragraph 47 is clear that the 5% buffer should be moved forward from later in the plan period. While the proposed allocations do provide for dwellings in excess of the target, providing a buffer against non-delivery, applying a 5% buffer to the overall housing target set out in the Site Allocations document (which is in accordance with the target set out in the Core Strategy which was adopted following independent examination) would be contrary to the NPPF and is not considered necessary.	No change considered necessary.

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6001 7/300 11/H3 6/S	Barclays Bank	H36	<p>Barclays reiterate their support for the complete redevelopment of South Oxhey to develop a balanced provision of residential and commercial uses within the Town Centre. This is in accordance with the aim of the adopted Core Strategy (2011) to meet the Town's housing need by focussing housing provision within the existing urban area, and more specifically 60% within Key Centres, including South Oxhey.</p> <p>Barclays continue to support Policy SA1 and reiterate the comments that we made in relation to this policy in the Pre-Submission Site Allocations (2012) document. In this respect, Barclays Bank consider that an appropriate balance of housing should be provided to ensure that South Oxhey is a fully functioning, self sufficient and sustainable community. This is necessary to significantly regenerate the declining Town Centre in accordance with the goals of the adopted Core Strategy (2011) and National Planning Policy Framework (2012).</p> <p>Barclays support the amendment to the site plan for the South Oxhey Town Centre (site ref. H(35)) to provide a more accurate red line boundary around the areas to be developed for housing or mixed use development comprising some residential uses. This provides a more appropriate level of clarity on the sites allocated for different uses within the Centre.</p> <p>Barclays therefore consider this element of the document to be sound and legally compliant.</p>	No change required.	Support welcomed.	No required.	change
6007 7/300 24/H3 6/C	Hertfordshire Biological Records Centre	H36	<p>The site lies adjacent to the CWS and LNR Oxhey Woods (ref: 90/006). The south west section of the allocated site whilst not within the CWS boundary does comprise woodland hence any residential development of this site would result in the loss of woodland and have an ecological impact that HBRC would anticipate would require compensation.</p>	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change
6014 1/300 39/H3 6/2	Thrive	H36	<p>We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H36 Grapevine Public House, South Oxhey.</p>	No change required.	Comment noted.	No required.	change
6022 4/300 50/H3 6/C	Thames Water Utilities Ltd	H36	<p>On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.</p>	No change required.	Comment noted.	No required.	change

Site H(37) Grazing Land at Foxgrove Path/Heysham Drive, South Oxhey

6000 4/300 04/H3 7/2	Mr C Viall	H37	<p>In putting forward objections to the inclusion of this site for development I am representing the 1037 local people who signed a petition opposing such development.</p> <p>At the time of initial consultation and despite 56% opposing, the site was incorrectly referred to and local residents did not realise the "disused playing fields at Heysham Drive" was in fact "educational grazing land at Foxgrove Path" as defined by County.</p> <p>It is part of wider green belt bordering the neighbouring county of Harrow to prevent urban sprawl, linked to a protected wildlife corridor with a public footpath dissecting the land.</p> <p>It would appear to go against the National Planning Policy Framework regarding the development of the green belt. In September a spokeswoman at the Communities Department was quoted as saying "The green belt is an important protection against urban sprawl. There are absolutely no plans to allow new building on the green belt".</p> <p>The field, aside from being the only one of its kind remaining in South Oxhey, is a possible flood plain and the environmental agency do not want building on flood plains.</p> <p>Para 11.3 at Page 70 states that "...Green Belt designation on allocated sites will be reviewed once development has been completed". This implies the Council will build on the green belt regardless and worry about its status later. Surely this is not an approach acceptable to National Government?</p>	Remove site H(37)	<p>The council acknowledges the number of responses to the consultation on the housing site at the Grazing Land at Foxgrove Path/ Heysham Drive, South Oxhey which raised concerns on the development of the site and the Green Belt in general.</p> <p>However the need to provide housing in the District and the absence of alternative deliverable non-Green Belt sites (as demonstrated by local evidence) may constitute very special circumstances which would be required for development to take place in the Green Belt.</p> <p>The site is a Greenfield Green Belt site, however there is a defensible boundary which would prevent further encroachment.</p>	No considered necessary.	change
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SCHEDULE OF REPRESENTATIONS

6007 8/300 24/H3 7/C	Hertfordshire Biological Records Centre	H37	No HBRC ecological information for the site. The site lies adjacent to the CWS Prestwick Road Meadows, South (Ref: 90/001). The site contains a large area of grassland that could support ecological interest. An ecological assessment is required to determine the extent of any ecological value. Any development on this site would place significant pressure on the connection Prestwick Road Meadows CWS has to open land to the south. Consequently, any development should retain a significant linking corridor and incorporate measures to protect the adjacent CWS.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No required.	change
6014 4/300 39/H3 7/2	Thrive	H37	In addition the following sites share access with Thrive Homes' existing stock, so the argument in favour of co-operation is even stronger: H37 Grazing land at Foxgrove Path/ Heysham Drive- Thrive Homes owns the block of flats access would require remodelling of the access to properties on Foxglove Path.	No change required.	Comment noted.	No required.	change
6016 2/300 42/H3 7/2	CPRE Hertfordshire	H37	This Housing Allocation is on a piece of grazing land on the edge of the District. The land is a completely open area of Green Belt. It is not Previously Developed Land and there is no policy justification for allocating it for housing. The Council's proposed change conflicts with Green Belt policy in the NPPF and the Council's Core Strategy, and would result in the further erosion of a narrow and very vulnerable strip of Green Belt between South Oxhey and the northern edge of London. The allocation is therefore unsound.	This allocation should be deleted.	The need for housing within the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt. Greenfield sites have been selected because not sufficient brownfield land is available, or suitable, for development. The detailed impact of future development on the site would be assessed through the planning application process.	No considered necessary.	change
6020 2/300 50/H3 7/C	Thames Water Utilities Ltd	H37	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No required.	change
6025 9/300 57/H3 7/C	Hertfordshire County Council	H37	Further to previous representations, there are no further comments to report at this site. The comments made in the SADPD regarding wildlife and nature are noted.	No change required.	Comment noted.	No required.	change

Site H(38) Rear of Lytham Avenue, South Oxhey

6007 9/30 024/ H38/ C	Hertfordshire Biological Records Centre	H38	No HBRC ecological information for the site. The site comprises open land that could support some ecological interest. An ecological assessment is required to determine the extent of any ecological value prior to development.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6014 2/30 039/ H38/ 2	Thrive	H38	We note that the following sites adjoin or are in close proximity to Thrive Homes existing stock. There are strong arguments in terms of management efficiency for Thrive Homes to be closely involved in taking proposals forward for any affordable housing within these schemes. We trust that you agree. The sites in question are: H38 Lytham Avenue, South Oxhey.	No change required.	Comment noted.	No change required.
6021 9/30 050/ H38/ C	Thames Water Utilities Ltd	H38	On the information available to date we do not envisage infrastructure concerns regarding Waste Water capability in relation to this site.	No change required.	Comment noted.	No change required.

5.0 Employment Site Allocations

Policy SA2: Employment Site Allocations

6001 3/30 008/ SA2/ S	Highways Agency	SA2	The Agency supports SA2 relating to Employment Site Allocations	n/a	Support welcomed.	No change required.
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SCHEDULE OF REPRESENTATIONS

Site E(a) Croxley Business Park

6003 7/30 020/ Ea/2	Natural England	Ea	Proposed employment sites Ea (Croxley Business Park) and Eb (Tolpits Lane) occur immediately adjacent to a Croxley Common Moor SSSI and LNR. The plan should make clear that any proposals at Ea and Eb will need to demonstrate that development will not have adverse impacts on this SSSI.	E(a) and E(b) amended to demonstrate that development will not have adverse impacts on the SSSI.	Paragraph 3.4 sets out that 'all development will be assessed in accordance with planning policy in the NPPF, the Core Strategy and Development Management Policies Documents and any subsequent local plan documents. It is not necessary to repeat the detail of these policies in the site allocations document. However it is proposed to highlight planning constraints relevant to employment sites.	Site E(a) Comments section to read: ' Part of zone is within a floodzone. Flood Risk assessment would be required to support planning applications on the site. Adjacent to a SSSI and a Local Nature Reserve. Measures to avoid adverse impacts and to enhance biodiversity will need to be provided by developers, applications would need to be supported by an adequate ecological survey. '
6008 0/30 024/ Ea/C	Hertfordshire Biological Records Centre	Ea	No HBRC ecological information for the site. The site lies adjacent to Croxley Common Moor SSSI along its south western boundary (a nationally important site for grassland heath); and Croxley Mill Wood and Fen along the north east boundary and lies on the edge of a KBA. An ecological assessment should be required if development is likely to have an impact on adjacent ecological interest.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6010 6/30 026/ Ea/2	Gade Investments Ltd	Ea	Employment allocations policy should make it clearer that within mixed use any individual site can be developed as employment, or housing or any combination - at present there is not this clarity which is required. Site such as Abbots B to the north of the KL mixed allocation is most suitable for housing only, as B uses exist to the immediate south on the 'Masters' yard and that employment area is likely to remain in its existing uses whereas the Abbots B site facing onto the lake to the north and being a cleared site with no flood risk is considered the best site for new housing - furthermore the development of this open site would not lead to any loss of employment land.	Remove mixed designation and site Abbots B Railway Terrace shown as housing allocation	The allocations accord with the Core Strategy requirement to provide additional residential development to 2026.	As stated in Policy SA2, sites allocated as having potential for mixed use development including, but not limited to business, industrial and storage or distribution; residential or community uses. Proposals will be assessed in accordance with the Core Strategy and therefore must take into account needs for employment and/or housing at the time of any application.
6024 5/30 055/ Ea/C	Environment Agency	Ea	A comment should be added to indicate that any future redevelopment proposals at the site will have to maintain a minimum 8m buffer zone (taking into account the requirements from our covering letter) adjacent to the River Gade (a main river). Any redevelopment of the site will need to be mindful of it's proximity to the Croxley Common Moor SSSI & LNR and should be designed to avoid any negative impacts on the biodiversity of the area. Redevelopment of the site will definitely require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the current industrial use of the site, and the two historic landfill sites within the site allocation ('Croxley Mills' and 'Land at Croxley Mills'). The whole site is in Source Protection Zone 1, meaning that contaminants could reach a public drinking water abstraction point in less than 50 days.	We feel that a comment should be added.	The Comments section to be updated to include: ' Minimum of 8m buffer must be provided to ditch on site. ' The Comments section to be amended to include the following sentence: ' The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site. '	The Comments section to be updated to include: ' Minimum of 8m buffer must be provided to ditch on site. ' The Comments section to be amended to include the following sentence: ' The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site. '

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Site E(b) Tolpits Lane

6003 8/30 020/ Eb/2	Natural England	Eb	Proposed employment sites Ea (Croxley Business Park) and Eb (Tolpits Lane) occur immediately adjacent to a Croxley Common Moor SSSI and LNR. The plan should make clear that any proposals at Ea and Eb will need to demonstrate that development will not have adverse impacts on this SSSI.	E(a) and E(b) amended to demonstrate that development will not have adverse impacts on the SSSI.	Paragraph 3.4 sets out that 'all development will be assessed in accordance with planning policy in the NPPF, the Core Strategy and Development Management Policies Documents and any subsequent local plan documents. It is not necessary to repeat the detail of these policies in the site allocations document. However it is proposed to highlight planning constraints relevant to employment sites.	Site E(b) Comments section to read: <u>'Adjacent to a SSSI, a wildlife site and Local Nature Reserve. Measures to avoid adverse impacts and to enhance biodiversity will need to be provided by developers; applications would need to be supported by an adequate ecological survey. Groundwater protection zone.'</u>
6008 1/30 024/ Eb/C	Hertfordshire Biological Records Centre	Eb	No HBRC ecological information for the site. The site lies adjacent to Croxley Common Moor SSSI (a nationally important site for grassland heath) to the north and CWS Hamper Mill Lakes (ref 89/004) to the south. The site also lies adjacent to a disused railway line that supports scrub and secondary broadleaved woodland and lies adjacent to a KBA. An ecological assessment should be required if development is likely to have an impact on adjacent ecological interest.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6017 8/30 045/ Eb/2	HCC Minerals and Waste	Eb	The county council supports the allocation of Tolpits Lane (ref: E(b)) for employment. This was previously allocated for employment in the Three Rivers Local Plan and is identified in the Waste Site Allocations Proposed Submission document as an employment land area of search (ELAS212), as it contains B2 and B8 uses that may be compatible with a waste management use.	No change required.	Support welcomed.	No change required.
6024 6/30 055/ Eb/C	Environment Agency	Eb	We would strongly support a green corridor as part of redevelopment of this site to provide a link between the Croxley Common Moor and Hamper Mill Lakes. A green corridor would be more beneficial to biodiversity and amenity than a footpath.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process. The comments section to be updated to include the following 'A footpath link <u>and/or green corridor</u> between Croxley Common Moor and Hampermill Lakes will be supported.'	The comments section to be updated to include the following 'A footpath link <u>and/or green corridor</u> between Croxley Common Moor and Hampermill Lakes will be supported.'

Site E(c) Carpenders Park West/Delta Gain

6008 2/30 024/ Ec/C	Hertfordshire Biological Records Centre	Ec	No HBRC ecological information for the site. The site lies on the other side of the railway line to the CWS Prestwick Road Allotments (ref: 90/35) that supports protected species.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6024 7/30 055/ Ec/C	Environment Agency	Ec	The site is constrained by the presence of the culverted Herts Bourne main river that runs through part of the site. Where possible, in line with your local policy DM08, this river should be de-culverted to create an open, naturalised channel. A minimum 8m buffer zone will need to be created around the Herts Bourne culverted main river to prevent culvert collapse and allow access for essential maintenance.	Further comments should be added	Comment noted. The detailed impact of future development would be assessed through the planning application process. It is not considered necessary to add further detail. The Comments section to be updated to include: <u>'Minimum 8m buffer must be provided to river on site.'</u>	The Comments section to be updated to include: <u>'Part of site is within a floodzone. Flood risk assessment would be required to support planning applications on the site.'</u> <u>Minimum 8m buffer must be provided to river on site.'</u> 'Allocation for employment' to be removed from the

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Comments section.

Site E(d) Maple Cross/Maple Lodge

6022 6/30 052/ Ed/C	Kennet Properties	Ed	<p>These representations are made on behalf of Kennet Properties Limited. KPL is a wholly owned subsidiary development company within the Thames Water Group. Its objective is to identify land that is surplus, or could become surplus to operational uses and therefore has potential to come forward for alternative beneficial uses. Consequently these representations relate to the land that Thames Water owns adjacent to the Maple Lodge Key Employment Area, identified as Site E(d) in the site allocations document.</p> <p>KPL are fully supportive of the allocation of Site E(d) for employment purposes, but consider there is potential for a modest increase in the size of the site identified through the incorporation of the adjacent redundant Thames Water depot site.</p> <p>The Maple Cross Employment site is identified as a Key Employment Area by adopted Core Strategy Policy CP6. It is therefore a location where the Core Strategy already directs new employment uses. The policy also confirms that in due course the Site Allocations document will review the boundaries of the existing Key Employment Areas, including the Maple Cross Industrial Estate.</p> <p>The SW Hertfordshire Employment Land Update of June 2010 confirms that the Maple Cross industrial estate has the potential to secure inward investment and that it is likely to be attractive to B class occupiers, particularly B8 occupiers given its close proximity to the motorway network. On this basis the update recommended that:</p> <p>the existing employment area continues to be protected; and an extension to the industrial estate is bought forward for B2 / B8 uses as soon as possible.</p> <p>The allocation of additional land at the industrial estate is therefore supported by an objective assessment of need in accordance with the requirements of paragraph 14 of the National Planning Policy Framework (NPPF). It will also contribute towards achieving the Government's objectives for achieving sustainable economic growth as set out in NPPF paragraphs 18 and 19. Extending the existing industrial estate will however necessitate a review of the Green Belt boundary.</p> <p>The NPPF attaches great importance to the protection of Green Belt from development. NPPF paragraph 83 confirms, however, that existing boundaries may be reviewed in exceptional circumstances through the preparation or review of the Local Plan. Paragraph 84 goes on to confirm that when reviewing Green Belt boundaries, planning authorities should take account of the need to promote sustainable development, with paragraph 85 then identifying a number of criteria that planning authorities should comply with. The criteria that are relevant to the review of the Green Belt boundary at Maple Cross require:</p> <p>Consistency with the Local Plan Strategy for meeting identified requirements for sustainable development – the expansion of the industrial estate is supported by objective evidence and allowance is made for Green Belt review via Policy CP6 of the Adopted Local Plan. That they not include land which it is unnecessary to keep permanently open – the site makes only a very limited contribution towards the openness of the Green Belt, it serves no purpose in preventing the coalescence of settlements. That they satisfy themselves that the revised Green Belt boundary will not need to be altered at the end of the development plan period – the employment land requirements for the District have been objectively assessed and tested via the examination of the now adopted Core Strategy, accordingly there is no reason to believe that the revised boundary will need to be reviewed further in the future. That boundaries are defined clearly using physical features that are readily recognisable and likely to be permanent – the access road to the Maple Lodge Sewage Treatment Works provides the eastern boundary to the site and is a permanent and defensible feature.</p> <p>In light of this analysis, it is clear that the allocation of site E(d) is sound and is in compliance with relevant Government guidance. Notwithstanding the above, TW considers that the proposed allocation could be extended by a modest amount in a northerly direction through the incorporation of their adjacent redundant depot site. The depot comprises of two large portal framed buildings and an area of hardstanding. The site constitutes previously developed land in accordance with the definition provided by the NPPF and as a consequence is a suitable location for development in principle. Inclusion of this additional land into the allocated site would not conflict with the criteria of NPPF paragraph 85 as discussed above.</p>	<p>Extension of site E(d) to include the adjacent redundant depot to the north of the site.</p>	<p>It is not considered necessary to extend site E(d). To ensure the long term and sustainable planning of the area a planning brief will be prepared for the Froghall Farm/Maple Lodge site. Any future proposals for the site would be considered in accordance with the NPPF.</p>	<p>No change necessary.</p>	<p>considered</p>
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6015 0/30 040/ Ed/2	Maplecross Properties	Ed	<p>The proposed wording as it stands in the proposed document is: <i>'Site Ref: E(d): Allocation for employment. To ensure the long term and sustainable planning of the area a planning brief will be prepared for the Froghall Farm/ Maple Lodge site by the Council in consultation with relevant stakeholders and those with a land interest.'</i></p>	Omission of site E(d).	Due to its sensitive location the Council did not consider it appropriate to amend the Green Belt boundary at Maple Cross necessary or appropriate. Retaining Green Belt designation provides control over future development of this significant site.	No change required.
			<p>The site has not actually been removed from the Green Belt; The National Planning Policy Framework (NPPF), at paragraph 85 states that 'when defining boundaries, local planning authorities should.. Not include land which it is unnecessary to keep permanently open.. Satisfy themselves that the Green Belt boundaries will not need to be altered at the end of the plan period.</p> <p>It is our view that in allocating the site for employment uses, meaning the site would be developed, the site would no longer be able to contribute to meeting the Green Belt functions set out in the NPPF e.g. to assist in safeguarding the countryside from encroachment. It would also be likely to constrain the development potential of the site. There would also be other ways through planning policy to protect the surrounding countryside areas. The Green Belt boundary should therefore be reviewed accordingly.</p>			
6008 3/30 024/ Ed/C	Hertfordshire Biological Records Centre	Ed	<p>We hold some ecological data for the eastern section of the site that comprises grassland with herb-rich areas in addition to a stream supporting a diversity of wetland plants. Any future development should take proper account of any existing or potential ecological interest. The site also lies in a KBA.</p>	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6015 6/30 042/ Ed/2	CPRE Hertfordshire	Ed	<p>This Employment Allocation not shown correctly as the larger area of the site is already allocated for Employment and is developed. The additional area proposed to be allocated is in the Green Belt. No very special circumstances have been demonstrated to support its development for Employment. A Secondary School Allocation is also proposed on part of the site Green Belt Part of the site.</p>	This allocation should be deleted.	Allocating land as a key employment area protects existing employment uses and directs new employment uses to these areas.	No change considered
			<p>The Council's proposed change conflicts with Green Belt policy in the NPPF and is therefore unsound.</p>		<p>The need for development within the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt.</p>	
6024 8/30 055/ Ed/C	Environment Agency	Ed	<p>Maplelodge Farm Ditch (a main river) runs through the site. A minimum 8m buffer zone (meeting the requirements set out in our covering letter), needs to be provided to this watercourse.</p> <p>An ecological assessment will also have to be submitted as the watercourse is a chalk stream, and much of the land is floodplain grazing marsh. Both of these habitats are identified as Biodiversity Action Plan habitats. They should not be negatively impacted by the redevelopment proposals.</p> <p>Redevelopment of the site will definitely require a Preliminary Risk Assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken. This is because of the current industrial and agricultural use of the site. The whole site is in Source Protection Zone 1, meaning that contaminants could reach a public drinking water abstraction point in less than 50 days.</p>	Further comments should be added	<p>The detailed impact of future development on the site would be assessed through the planning application process.</p> <p>The Comments section to be updated to include: <u>'Part of site is within a floodzone. Flood risk assessment would be required to support planning applications on the site.'</u></p> <p><u>Minimum of 8m buffer must be provided to ditch on site.'</u></p> <p><u>Part of the site is adjacent to a wildlife site. Measures to avoid adverse impacts and to enhance biodiversity will need to be provided by developers; applications would need to be supported by an adequate ecological survey.</u></p> <p><u>The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u></p>	<p>The Comments section to be updated to include: <u>'Part of site is within a floodzone. Flood risk assessment would be required to support planning applications on the site.'</u></p> <p><u>Minimum of 8m buffer must be provided to ditch on site.'</u></p> <p><u>Part of the site is adjacent to a wildlife site. Measures to avoid adverse impacts and to enhance biodiversity will need to be provided by developers; applications would need to be supported by an adequate ecological survey.</u></p> <p><u>The site lies within Source Protection Zone 1. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site.'</u></p>

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'Allocation for employment' to be removed from the Comments section.

Site (e) Kings Langley Employment Area

6000 9/30 007/ Ee/2	Imagination Technologies	Ee	<p>Policy E(e) identifies the Home Park Industrial Estate as a 'mixed use allocation'. As stated in previous representations, it is not appropriate or realistic to promote Imagination Technologies' site for uses other than employment given the commitment to the site that IT has.</p> <p>Home Park Industrial Estate is long established employment site which is currently the subject of redevelopment works, to improve and enhance its business/employment function. The first phase of this redevelopment process is largely complete and planning permission for phases 2 and 3 has been granted with construction expected to begin in 2013.</p> <p>If the site is redeveloped as envisaged, the site will have no potential (or surplus space) for any additional uses such as housing. Consequently the draft designation has no realistic prospect of coming forward during the plan period.</p> <p>Furthermore, IT is a high-tech company that require high security levels on site. This would therefore not be an appropriate site for mixed use developments due to potential security breaches.</p> <p>The site does not have any realistic prospects for mixed use development due to the existing, and long established office use on site and, more importantly, ITs plans fro redevelopment which are already underway. Furthermore, IT are the sole owner of the land and have no interest in promoting residential or mixed use development on their site - as demonstrated by the recent planning permission and works on site, they are strongly committed to improving their existing office buildings through redevelopment and have no scope or need for other uses.</p>	<p>E(e) should not reallocate the estate to mixed use development as the site and existing use are not appropriate for this use.</p>	<p>There is a need to provide 4,500 dwellings in the District between 2011- and 2026. The proposed housing site is within an existing urban area with reasonable access to public transport, education, local shopping and open space. There are no expected significant adverse impacts on the environment.</p> <p>Furthermore the housing site would be on previously developed land in a Key Secondary Centre. It would be a mixed use development that would meet the needs of both local and community needs. Consequently it is not considered appropriate to remove site H(3).</p> <p>Policy SA2 sets out sites allocated as having potential for mixed used development may provide for mixed use development including, but not limited to business, industrial and storage or distribution; residential or community uses. Therefore designation as mixed use does not prevent the use of the site for business (as existing) however the allocation provides flexibility for the future.</p> <p>The Council does not consider it appropriate to remove Home Park Industrial Estate from the mixed used allocation.</p>	<p>No change considered necessary.</p>
6008 4/30 024/ Ee/C	Hertfordshire Biological Records Centre	Ee	<p>Two of the sites lie adjacent to the CWS: Kings Langley Lake (ref: 75/010) and most are bounded to the west by the CWS Grand Union Canal / River Gade (ref: 76/006) to the west. In January 2012, the southern section of 75/010 was destroyed adjacent to the lake that is included in the allocated site. Future development of the site should take this into consideration and include a buffer zone along the boundary of the proposed development with both CWSs and require adequate ecological consideration in any development proposals. Protected species records also present.</p>	<p>No change required.</p>	<p>Comment noted. The detailed impact of future development would be assessed through the planning application process.</p>	<p>No change required.</p>

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6011 4/30 030/ Ee/1	New Gospel Halls Trust	Ee	<p>New Gospel Hall Trust is a charitable ecclesiastical trust responsible for the provision and maintenance of Gospel Halls for the Plymouth Brethren Christian Church in the Watford area, including adjoining districts where the congregation reside. The Trust has engaged in an ongoing search for new gospel halls in the area.</p> <p>The Trust have made representations to the Council through the LDF process and have also made preliminary enquiries in respect of a specific site at South Bend Station Road Kings Langley which is in mixed use with employment and residential uses. This lies close to the southern boundary of the E(e) Mixed Use Allocation at Kings Langley.</p> <p>The Trust welcome the recognition that the Kings Langley Employment Areas can be considered suitable for housing under Policy SA1 and also employment uses including mixed uses with community uses under Policy SA2.</p> <p>The area is characterised by the industrial legacy from the Dickinson Paper Mills (Nash Mills and Home Park Mills) and the Ovaltine factory. Some redevelopment has already taken place with modern high density housing and modern employment units alongside the more traditional housing and employment areas contained by the River Gade/Grand Union Canal and the West Coast Main railway line giving a locally distinctive linear development on the valley floor. The built environment extends south of the allocated land fronting to Home Mill Link Road and it is considered that the allocation site should also include the frontage land and buildings west of Kings Langley railway station as shown on the attached plan 1272/2. This land is already in mixed uses and the extended allocation would ensure that redevelopment proposals can be considered in the additional area, including community uses such as a new place of worship.</p> <p>Core Strategy policy CP11 and paragraph 5.103 and 5.104 provide a basis for 'minor adjustments' to the Green Belt boundary to accommodate growth in the most sustainable locations on the edge of existing settlements. It is considered that Station Road Kings Langley falls into this category.</p>	<p>Extend the 'mixed use' allocation site from Home Park Industrial Estate to include the existing built environment fronting to Station Road, Kings Langley immediately west of the railway station as shown on the attached plan.</p>	<p>Allocated site E(e) is a large site with the potential to provide housing, employment and other associated services and facilities to create a sustainable community. It is not considered appropriate or necessary to increase the site area further. If very special circumstances are demonstrated then permission may be granted for the suggested development site.</p> <p>Comments section revised to read: '<u>Individual employment sites within the broad area have not been specifically identified.</u></p> <p>Comments section revised to read: '<u>Individual employment sites within the broad area have not been specifically identified.</u></p> <p><u>Minimum 8m buffer must be provided to River Gade.</u></p> <p><u>Part of the site (north of Masters Yard) is identified as a wildlife site. Measures to avoid adverse impacts and enhance biodiversity will need to be provided by developers, supported by adequate ecological survey.</u></p> <p><u>A number of waste sites are located to the north of the site. Parts of the site are in Source Protection Zones 1 and 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site</u></p> <p><u>Primrose Hill Playing Fields would need to be retained, or replaced with at least equivalent facilities, as part of any redevelopment.'</u></p> <p><u>Primrose Hill Playing Fields would need to be retained, or replaced with at least equivalent facilities, as part of any redevelopment.'</u></p>	<p>Comments section revised to read: '<u>Individual employment sites within the broad area have not been specifically identified.</u></p> <p><u>Minimum 8m buffer must be provided to River Gade.</u></p> <p><u>Part of the site (north of Masters Yard) is identified as a wildlife site. Measures to avoid adverse impacts and enhance biodiversity will need to be provided by developers, supported by adequate ecological survey.</u></p> <p><u>A number of waste sites are located to the north of the site. Parts of the site are in Source Protection Zones 1 and 2. A preliminary risk assessment to determine whether there is contamination of the site and whether further remediation works will need to be undertaken would be required to support planning applications on the site</u></p> <p><u>Primrose Hill Playing Fields would need to be retained, or replaced with at least equivalent facilities, as part of any redevelopment.'</u></p>
<p>6.0 Education Allocations</p>						
6012 4/30 032/ 6/C	Dacorum Borough Council	6	<p>With regard to infrastructure, it will be especially important for liaison to be maintained between TRDC, DBC and HCC on school matters – particular regarding the issue of primary schooling. This commitment to liaison was set out in the Statement of Common Ground agreed between DBC and TRDC prior to the hearings on Three Rivers Core Strategy (May 2011). HCC continue to advise Dacorum that a 2 form entry primary school must be delivered in the Abbots Langley area in order to enable Kings Langley Primary to provide for the future needs of the village."</p>	<p>No change required.</p>	<p>Comment noted. The Council considers that cross boundary issues are important issues that would be discussed in future Duty to Cooperate meetings. Dacorum Borough Council would also be a consultee on any planning applications for development close to the boundary with Dacorum.</p>	<p>No change required.</p>

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6010 9/30 027/ 6/1	WD3 School Action Group 6	<p>In order to be sound, the Plan should be flexible and represent the facts accurately. As it is currently worded, there is little flexibility for Secondary School development. Also, discussion of local community opposition to some of the secondary school proposals is not entirely accurate. It is true, as the Plan suggests, that many in the immediately local Croxley Green community have opposed the allocation. However, those for whom a new Croxley Green school would be a locally accessible school but who do not live in Croxley Green have joined Croxley Green parents (such as those represented by www.school4croxley.net) to voice support for the Baldwins Lane allocation.</p> <p>The presentation of these points could be significantly improved by changing the emphasis of sections 6.2 to 6.16. At present, the Plan is built on an assumption that all of the three listed sites will be viable. The technical studies cited in the Plan note that there are difficulties associated with the sites and it is not yet certain if these, or any other difficulties that may yet come to light, are surmountable. Thus, in order for the Plan to be as flexible as possible, there is a need to include all three sites on an equal footing in case the first option pursued later turns out to be unviable for some reason. In other words, there has always been a need to include three possible sites in case two sites are needed to satisfy school place requirements and one of the three sites later becomes undeliverable. The fact that the County Council and District Council are in dispute over the appropriateness of two of the sites is immaterial to whether the Plan is workable – two sites may be needed if demand for school places is as forecast, and one of the sites may yet prove undeliverable. Furthermore, some of one of the sites (site S(b)) has also been allocated as an employment site (site E(d)); thus, part of one of the education allocations may become unavailable for a Secondary School development if used for employment. This could be a serious problem if other parcels of the Froghall Farm site S(b) are later proven to be unviable/undeliverable for educational infrastructure. To make this Plan sound, this flexibility needs to be reflected in the wording of the Plan, and accurate statements about community support and opposition also need to be made.</p>	<p>Section 6.4 should read instead: The Core Strategy recognises the need for additional secondary school places in the District and proposes that land be allocated for this purpose with between one and three new reserve secondary school sites in the Rickmansworth Area, depending on the outcome of Hertfordshire County Council work on the potential to expand existing secondary school provision in the south west Hertfordshire area.</p> <p>Section 6.5 should read instead: Based on current pupil forecasts, the County Council have requested the allocation and reservation across the plan period (up to 2026) of two sites for secondary education. Both sites will not necessarily be developed, or be developed in the short term, if for example the numbers of pupils forecast do not emerge. To maximise flexibility in this Plan, three sites have been reserved for secondary education in case, as part of the development process, it later becomes clear that one of these sites is unviable for secondary educational purposes.</p> <p>Section 6.6 should read instead: Given the geographic spread of existing schools in south west Hertfordshire and the growing pressure from both the Rickmansworth and Watford areas, the County Council advise that it is appropriate to allocate one site in the west of the District (Mill End/Maple Cross) and one site in the east (Croxley Green). To maximise flexibility in this Plan, two sites have been reserved for secondary education in the west of the District in case, as part of the development process, it later becomes clear that one of the three reserved sites is unviable for secondary educational purposes.</p> <p>Section 6.12 should read instead: As the Councils have not been in agreement regarding allocation of site S(a), the County Council have confirmed that they are willing to support the District Council in bringing forward sites S(a) and S(b) for allocation as a way forward and to provide flexibility whilst further investigation and liaison with landowners take place. However, this also builds future flexibility into the Plan by ensuring that, should it later become clear that one of the three reserved sites is unviable two sites remain available for secondary educational purposes.</p> <p>Section 16.15. This section should be deleted altogether in case the Baldwins Lane allocation later proves itself unviable, and to therefore maximise the flexibility of the Plan.</p> <p>Section 16.15 should read instead: In the east of the District, Site S(d) Croxley Green – land north east of Baldwins Lane has been reluctantly allocated as the least</p>	<p>Paragraph 6.4 relates to the Core Strategy which refers to one or two new reserve school sites therefore this can not be updated in the site allocations document.</p> <p>The change requested to paragraph 6.5 would not provide any additional information and is not considered necessary.</p> <p>The change requested to paragraph 6.6 would not provide any additional information and is not considered necessary.</p> <p>The change requested to paragraph 6.12 would not provide any additional information and is not considered necessary.</p> <p>The change requested to paragraph 6.15 would not reflect the responses received from previous consultations.</p>	<p>No change considered necessary.</p>
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unacceptable site to meet the need for school places in this area. The site is the greater part of a relatively small part of Green Belt separating Croxley Green and Watford, and therefore many in the immediately local community have voiced their opposition to this allocation as a counter to the support shown by parents in Croxley Green and in the wider south west Hertfordshire region

6025 2/30 056/ 6/C	Cllr F Button	6	<p>The main issues for the County Council, as a Service Provider involve the provision of services and infrastructure to meet local community needs. As a result, in this particular case, I am interested in securing sufficient school places, by making appropriate existing school expansion options available and through the allocation of suitable reserve primary and secondary school sites. I am aware that HCC has made representations to TRDCs consultation documents over the last three years thereby making the case for education sites to be identified and allocated within the LDF.</p> <p>I understand in previous representations, that we have identified the rising birth rates throughout the County and made the case that additional school places were likely to be required as a result of underlying population growth and new housing development I also know that TRDC have not identified any sites for primary schools within the district, despite this being suggested in several areas. I am very concerned about this matter and believe that the site allocations document should make provision for infrastructure which is required to support the effective delivery of housing in the district.</p> <p>I also understand that work has been undertaken by both Councils to identify a primary school site in the Abbots Langley area, so far without success. This is particularly important since a school in this area will not only serve its immediate area but would also assist with alleviating demand in Kings Langley. The County Council is very keen to work with you to find an appropriate site and I am informed that following a HCC site search, there is a suitable site available (at Woodside Road, Abbots Langley). I would urge you to think again about the needs of the local community which have been set out previously and to reconsider whether this site can be allocated, in the absence of any viable alternatives.</p> <p>In relation to Carpenders Park, I note that sites have not been allocated for housing in the SADPD therefore it has been indicated that there is no need arising from new developments in Carpenders Park. I am aware of planning permission having already been granted for 31 homes off Delta Gain. In addition an adjacent site fronting Station Approach currently occupied by Kebbell Homes and occupying part of the site 'Carpenders Park West/Delta Gain has been the subject of interest from developers. This site is proposed for employment use. I feel that I should mention that if this site comes forward in the plan period, for instance as a windfall development, very careful thought must be given to where pupils will be educated. The local primary school, St Meryl, is currently full and likely to be so for the foreseeable future.</p> <p>TRDC has responded to HCC's representations by making sites available for secondary provision in the SADPD. This is enormously helpful to the County Council in enabling the provision of much needed Services and infrastructure for the local community for years to come. Sites S(d) and S(a) are eminently suitable sites for new schools. As you know HCC has reservations about Site S(b), since technical work to date suggests that there are significant constraints which may not be cost effective or timely to overcome. I therefore welcome your assistance in ensuring that the most suitable site is brought forward at the right time to support the local community needs.</p>	Allocation of an addition school site- Woodside Road, Abbots Langley.	The Council have considered the allocation of Woodside Road for housing and a primary school however this has not been considered appropriate because of impact on the Green Belt and on traffic. A primary school on this site would not be deliverable without the housing.	No change considered necessary.
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6025 4/30 057/ 6/1	Hertfordshire County Council	6	Implications for Delivery of Education	Provision of primary schools in the district.	Policy SA3 sets out that TRDC will continue to work with the County Council, joining authorities and other interested parties to identify the most appropriate sites to meet identified educational needs. At this stage appropriate sites have not been identified for inclusion in the sites allocation document. However we will continue to work with the County Council to address future needs.	No change considered necessary.
<p>In previous representations, we identified the rising birth rates throughout the County and that additional school places were likely to be required as a result of housing development and set out the methodology used to establish the likely pupil place requirement. We have checked the housing allocations in the latest documents, which have changed slightly and comment accordingly. Dwelling figures identified in the previous version of the SADPD are shown in brackets.</p> <p>The County Council document 'Meeting the Rising Demand for School Places' has been updated (September 2012 Update) and can be found at http://www.hertsdirect.org/docs/pdf/m/meetingprimary.pdf</p> <p>The National Planning Policy Framework advises at paragraph 72:-</p> <p>The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should:</p> <ul style="list-style-type: none"> •• give great weight to the need to create, expand or alter schools; and •• work with schools promoters to identify and resolve key planning issues before applications are submitted. <p><u>The impact of growth in Three Rivers at primary education level</u></p> <p>We have previously considered the impact of the housing site allocations in each of the Education Primary Planning Areas in Three Rivers and made suggestions as to an approach to deal with expected pupil yield. It is noted that TRDC have not identified any sites for primary schools within the district, despite this being suggested in several areas. This is considered to be a significant area of weakness in this plan, and raises the matter of soundness. The site allocations document should make provision for infrastructure which is required to support the effective delivery of housing in the district and it fails to do so in this respect.</p> <p>HCC's representations frequently refer to units of school provision in forms of entry (FE). By way of explanation, 1 FE equates to 30 children per year group or 210 in total in a 1 FE primary school (plus 30 nursery school children).</p> <p>Our comments on each of the education planning areas are as follows:-</p> <p><u>Chorleywood and Sarrat</u></p> <p>In this area the dwellings proposed are low in number (10). However, we have already seen an increase in demand for school places in this area and as a result The Russell School in Chorleywood was temporarily expanded by 1 FE for one year in 2011. There is a forecast deficit of places of up to 1FE in 2013 and there is a potential small deficit in 2014 which reduces slightly thereafter. It is therefore prudent to identify that additional capacity may be required in the future to meet the natural growth in the population. Further feasibility work is required, but it is assumed that expansion of an existing school may be achievable.</p> <p><u>Croxley Green</u></p> <p>The SADPD proposes a total of 80 (85 previously) dwellings in the Croxley Green area over the plan period. The most recent forecast indicates that there is an ongoing deficit in the number of reception places of nearly 1 FE from September 2013. Capacity exists within existing schools locally to raise provision by up to 1 FE, which should be sufficient to meet the anticipated need from 2013 and the additional 80 dwellings planned.</p> <p><u>Rickmansworth, Loudwater, Mill End and Maple Cross</u></p> <p>The document proposes a total of 243 (257 previously) dwellings in this area over the plan period. This scale of development would produce the need for an additional 0.5 FE which, taking into account that local schools are full and including the need for some reserve capacity, would lead to the requirement for an additional 1 FE capacity overall.</p> <p>In representations made in February 2012 we advised "whether this is achievable by expansion of an existing school requires further feasibility work which is currently being undertaken. However it would be prudent to allocate a reserve site for a 1FE school capable of expansion to 2FE in the future if required to enable flexibility and parental choice."</p> <p>An update to this position is that Shepherd Primary School; Rickmansworth is currently being expanded by 1 FE to meet the existing demand for 2013. It is now understood, having assessed expansion potentials at the other local schools that further opportunities to add capacity are extremely limited. Thus a site for a primary school (1 FE school on a 2FE site) should be identified within the SADPD.</p>						

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Abbots Langley, Leavesden and Bedmond

We previously advised the following:-
There is current demand for school places in this area which amounts to 1FE, some of which is attributable to a wider area including parts of North Watford. It is forecast that the level of demand will continue for the foreseeable future.

Assuming that children from the Langleybury development could be accommodated at St Paul's Primary School, then the proposed development allocation comprises 565 units over the plan period. The additional capacity needed in respect of this is likely to be an extra 1FE as identified in our response to you dated 11 March 2010.

With the additional housing planned for this area, it would be prudent to plan for an additional 2FE future capacity. Leavesden Green Primary school is reasonably well located to meet demand from the planned additional housing, and may have capacity to expand by 1FE (subject to further feasibility work). However, pupil numbers have increased significantly in Watford, and are forecast to continue to increase further. Capacity at Leavesden Green is therefore likely to be required to meet this continued pressure, alongside plans for additional new primary schools in Watford town. At this stage a 2FE education reserve site in the Abbots Langley planning area should be allocated to allow for future demand in Three Rivers district.

HCC undertook a local primary school site search in 2010. The following new school site options have been considered by both HCC and TRDC :-

1. Leavesden Aerodrome – HCC expressed interest in this site. However, a planning application was made in 2010 and developers of this site have secured planning permission for residential and leisure uses. Section 106 funds are to be provided towards primary education places locally.
2. Ashfields, Leavesden – due to a number of constraints the County Council does not consider that this site is deliverable and this has been agreed by TRDC.
3. Woodside Road, Abbots Langley – This site is considered to be suitable by HCC for a primary school site, either on its own, or as part of a residential/open space development, and the landowners are willing to make the site available as part of a residential scheme. HCC was aware that TRDC was not initially agreeable to this site being brought forward for these uses and requested that the suitability of this site for primary education purposes be reconsidered in representations made in February 2012. TRDC considered the matter at Executive Committee (3 September 2012) but did not resolve to allocate this, or any other site, in this area.

It is noted that 530 dwellings are being proposed in the current document. The proposed development is expected to yield 1 FE of primary age children

The forecast in Abbots Langley continues to indicate that there will be a deficit of places in the locality. Additional places have already been made available at Tanners Wood Primary School on a permanent basis from 2012. However, taking these in to account, there will be no capacity in the area in 2014/15 with a deficit of around 1 FE forecast in 2015/16. There is no opportunity for expansion within existing schools to deal with this deficit. The existing education infrastructure will not have the capacity to accommodate this increase.

As previously indicated, forecasts in north east Watford have increased and the most recent forecast indicates an on-going deficit of reception places. As a result any existing capacity in this area will be required to meet this local need and will not be available to offer additional capacity to serve the Abbots Langley area.

As things currently stand there will be no provision for a new 2FE primary school to serve this area. However, HCC considers that a site for a primary school should be identified within the SADPD in this education planning area.

4.8 Kings Langley

It is noted that the forecast development for this area has been reduced to 180 (previously 190) dwellings; however there remains a need for additional primary school places in the Kings Langley area.

The settlement of Kings Langley is bisected by an administrative boundary and lies partly within TRDC and partly within Dacorum borough (DBC). Kings Langley Primary School is full with no prospect of permanent expansion. This primary school also attracts children from the southern part of Hemel Hempstead (in DBC).

There remains a need to increase capacity in terms of primary school places in the Kings Langley area which cannot be met by the expansion of Kings Langley Primary School, because of significant site constraints. The level of housing proposed in this locality does not necessitate a new primary school and it is therefore necessary to develop a strategy to accommodate additional demand.

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In 2011, in preparation for the Three Rivers Core Strategy EIP, TRDC and DBC jointly wrote a Statement of Common Ground (SoCG) to deal with issues around primary places in this settlement. HCC provided comments on the situation in a letter dated 11 May 2011 to TRDC (attached) The SoCG (also attached) concluded:-

That TRDC, DBC and HCC will continue to work closely together to identify how best to meet future needs. If subject to feasibility studies, HCC consider that a new primary school should be planned for the Kings Langley/Abbots Langley area, then a site can be progressed through the LDF process. Depending on where sites are to be located, this can be progressed through both Councils' Site Allocations DPDs. In the short term the three authorities will continue to monitor and share information about the need for primary school provision as sites in the area come forward. In assessing applications for housing development in the Kings Langley area, TRDC should liaise with HCC to confirm whether or not critical levels of primary school provision will be breached and if so that provision has been planned for.

The strategy set out in the Statement of Common Ground articulated the need for education allocations for new 2 FE primary schools in both south Hemel Hempstead and Abbots Langley, to alleviate pressure on school places in Kings Langley. In line with strategy and in response to this need Dacorum Borough Council has identified a new school site in the south of Hemel Hempstead through their Core Strategy.

As things currently stand there will be no provision for a new 2FE primary school in TRDC to serve this area. However, HCC still maintains that a site for a primary school should be identified within the SADPD to serve the Abbots Langley education planning area

4.9 Oxhey Hall, North Oxhey and Moor Park

105 dwellings are proposed in this area. We appear to have misunderstood the previous allocation as approximately 30 dwellings.

Current feasibility work indicates that there is very limited capacity in schools within the Oxhey Hall and Oxhey North area.

Moor Park contains one primary school. The current forecast indicates that there is some capacity to absorb a small amount of additional housing and it is considered therefore that the proposed dwellings can be accommodated.

4.10 South Oxhey

The proposed development in this area is set to increase to 510 (505) dwellings over the plan period. The situation in this area shows that demand for school places is increasing. The current forecast indicates a deficit of up to 0.5FE from 2013 and it is suggested that up to 1 FE is identified to meet the existing population growth. This indicates a total 2FE requirement in the South Oxhey area

HCC previously advised that land adjacent to St Josephs School (owned by HCC) should be allocated as reserve school land for the expansion of that school by 1 FE in the event that additional capacity is required and other options exhausted. It is noted that this site has been removed from the SADPD proposed housing sites, however it has not been identified as a reserve education site. It is recognised that since HCC owns this land, the making use of it for education purposes should be straightforward, however, identification of the site within a wider strategy to deal with known needs over the plan period, if required, within the SADPD would offer the local community certainty that needs can be met in a coherent planned approach.

4.11 Carpenders Park

No sites have been allocated for housing in the SADPD therefore there is no need arising from new developments in Carpenders Park. If sites do come forward in the plan period, outside of the plan, however very careful thought must be given to where pupils will be educated. The local primary school, St Meryl, is currently full and likely to be so for the foreseeable future.

4.12 Bracket Wood/Garston

No sites have been allocated for housing in the SADPD therefore there is no need arising from new developments

4.13 Conclusion

In conclusion, it is considered that the current Submission DPD fails to provide sufficient sites to meet primary education need over the plan period, but must do so in order that it is, consistent with national policy, effective (delivers the right sites in the right locations) and as a result, can be found to be sound. HCC first advised TRDC of the needs of the community in representations made in March 2010 and is disappointed that primary education sites have not been identified within the SADPD.

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5.0 Impact of growth in Three Rivers at Secondary Education level

5.1 The County Council has communicated to TRDC the clear and pressing need for additional secondary school places in maintained schools in the district, to serve the needs of the area at every opportunity since 2009.

5.2 HCC has looked at the potential to expand existing secondary schools in the area, and has as a consequence identified that additional school sites will be required to meet the needs of the local community over the plan period. In 2010, HCC commissioned consultants to conduct a wide search across South West Hertfordshire (including Watford, Bushey and Rickmansworth) in an effort to identify suitable school sites and worked with TRDC to arrive at the most appropriate locations for a shortlist to be identified in an early version of the SADPD. HCC has fully justified an approach which seeks the allocation of two sites for new secondary schools to serve the wider area. Two sites are required, one each in the east and west to meet needs at either end of the district and in the surrounding area of south west Hertfordshire. The County Council is pleased that TRDC has responded to the substantial evidence provided and has identified sites within the SADPD.

5.3 The proposed secondary school sites are identified in the SADPD as S(d) Croxley Green, S(b) Froghall Farm and S(a) Land east of A405/north of A412. Having undertaken significant feasibility work, to examine identified constraints in some detail, HCC has expressed a preference for sites S(d) and S(a). The County Council is very pleased with the allocation of site S(d) Croxley Green as this is a suitable, accessible site which will meet the needs of the local community well.

5.4 The allocation of Site S(b) as an education site is preferred by TRDC to Site S(a) but is considered to be less suitable by the County Council. However it has been agreed by HCC and TRDC that discussions will take place with landowners/developers to see if the perceived obstacles to development can be overcome. A meeting has been held between TRDC, HCC, the developers and landowners, plus consultants, however at this stage it seems that delivery of site S(b) for education purposes in a cost effective, education-appropriate and timely manner is uncertain.

5.5 The technical issues which have been considered are set out in more detail in the representations which were made by HCC in March 2012.

5.6 The County Council therefore considers that TRDC has responded to the representations made and has supported the need for secondary provision. There does however, need to be clarification in relation to how and when decisions can be made on whether Site S(a) or S(b) can be effectively delivered for education purposes in a timely manner.

7.0 Conclusion

7.1 Hertfordshire County Council welcomes this opportunity to make further comment on the SADPD. We hope that the above comments, information and suggested changes are helpful in developing revisions to the submission document, to assist with the current issues of soundness which prevail.

Policy SA3: Education Site Allocations

6001 4/30 008/ SA3/ S	Highways Agency	SA 3	The Agency supports SA3 Retail Allocations	n/a	Support welcomed.	No change required.
6017 2/30 045/ SA3/ 2	HCC Minerals and Waste	SA 3	None of the sites allocated for secondary schools (refs: S(a), S(b) and S(d)) are located within the areas of search for permanent waste management facilities that are identified in the Waste Local Plan. This is also the case with regard to the allocated sites and employment land areas of search that are identified in the county council's Waste Site Allocations Proposed Submission document, published in November 2012. The areas identified on the inset maps that are anticipated to be occupied by the building's footprint are not considered to have significant, workable mineral reserves that could be extracted prior to any development taking place. Therefore, there would be no minerals sterilisation issues raised in relation to Minerals Policy 5-Mineral Sterilisation.	No change required.	Comment noted.	No change required.

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6026 1/30 058/ SA3/ 1	Taylor Wimpey	SA 3	Do you support this policy? 13.1 No Comments 13.2 The Policy states: "Three Rivers District Council will continue to work with the County Council, adjoining authorities and other interested parties to identify the most appropriate sites to meet identified educational needs. Identified education sites for new secondary schools will be safeguarded for educational use". 13.3 Whilst we support the positive allocation of sites for secondary school provision, we strongly object to the complete absence of any provision for primary schools, and moreover, the lack of any justification for this omission. 13.4 We can be generally supportive of the policy's wording with regard to its assurance that it will "work with the County Council" to "identify the most appropriate sites to meet the identified educational needs". However, it is already apparent through the preparation of this SADPD that this is not the Council's approach to education provision, evidenced by its failure to allocate any primary school sites, despite the County Council's clear indication that such sites are needed, and through its failure to allocate the County Council's identified preferred site, which is at Woodside Road (see email correspondence at Appendix 2). This preferred site is both available and suitable for development and can be secured for development at no public expense as part of an allocation of adjoining land for residential development. 13.5 The SADPD fails to conform with the adopted Core Strategy in relation to provision for education. The Inspector's Report into the Core Strategy identified that there was a gap in infrastructure provision, particularly in school provision. With regard to education infrastructure, the Inspector noted at paragraph 30 of his report that: "Education Infrastructure 30. Hertfordshire County Council has identified a need for additional school places at both primary and secondary level as a result of population changes during the plan period....Work to identify the necessary site/s is ongoing through development of the SADPD. However the County Council has expressed concern that the CS Place Shaping Policies do not adequately address the need for education provision as they fail to highlight the possibility that new schools, as well as the expansion of existing schools, may be needed at both secondary and primary level. In order to address this matter the Council has suggested a wording change to each of the Place Shaping Policies". 13.6 Hertfordshire County Council are clear that the need for an additional primary school in the Abbots Langley area exists taking account of planned growth, and this is evidenced by Table 1 below which sets out current primary school provision. For the Council to ignore this need in the preparation of the SADPD renders the Plan unsound in its failure to conform to the Core Strategy. 13.7 The Draft SADPD published in January 2012 identified a site at the Ashfields/Aerodrome Way site for a potential primary school site, but this has now been removed from the plan as it was unavailable and wholly unsuitable. Whilst we support the removal of the Ashfields/Aerodrome Way site, the Council's decision to proceed without a primary school allocation at all renders the Plan unsound when assessed against the NPPF criteria, on the basis that Policy SA3: · Does not seek to meet objectively assessed development and infrastructure requirements - i.e. the identified need for additional primary school provision. The policy is therefore not positively prepared; · Does not identify the most appropriate strategy, and fails to give proper consideration to the reasonable alternatives - i.e. the presence of a suitable site at Woodside Road. The policy is therefore not justified; · Makes the Plan undeliverable over the plan period by failing to provide the necessary community infrastructure requirements to support the planned level of growth. The policy is therefore not effective; · Does not comply with national policy and fails to promote sustainable development. Specifically, the policy is contrary to paragraph 72 of the NPPF which states: o "The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education". The policy therefore is not consistent with national policy. Woodside Road Site 13.8 We object to the failure of the plan to allocate the Woodside Road site for the provision	Inclusion of primary school at Woodside Road.	Woodside Road with a dwelling capacity of 100 and also a primary school is a greenfield and green Belt site which is likely to have a significant impact on the Green Belt. There are concerns about access to the site and traffic in the area particularly given the proximity to three schools already in the area. The provision of primary education would be addressed through the planning application process by S106 agreements and CIL in the future.	No change considered necessary.
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of a primary school. The site is available, suitable, and is the County Council's preferred site for a new school.

13.9 The proposed site at Woodside Road scores highly as a sustainable site in the SADPD Site Scores, with excellent links by walking and cycling and public transport. Access to the proposed development at Woodside Road is proposed to be via a roundabout junction off Woodside Road, providing a natural traffic calming feature along this road.

13.10 The main impact of the proposed development in terms of vehicle movements and the increased demand from pedestrians, cyclists and public transport would be generated south of the proposed site from Abbots Langley. Currently, the two main junctions south of Woodside Road, a double mini roundabout and a conventional roundabout, operate above their operational capacity, on one or more of their arms, regardless of the proposed development being in place. Therefore, ongoing consultation has taken place Hertfordshire County Council Highways to find a way of not only accommodating the proposed development traffic and increased pedestrian and cycle demand but also to improve existing highway conditions.

13.11 The solution to this would in the form of a proposed MOVA (Microprocessor Optimised Vehicle Actuation) controlled traffic signal junction in place of the double mini roundabout junction of Woodside Road/College Road/Horseshoe Lane. MOVA is a sophisticated strategy using the latest computer processing power to evaluate the best signal timings, taking into account the junction layout, the signal stages allowed and the traffic flow conditions at any given time. MOVA is highly adaptable and will vary the signal timings significantly as traffic conditions alter. Due to the proximity of the conventional roundabout to the existing double mini roundabout (approximately 90m), the proposed MOVA traffic signal junction will also help to regulate vehicle movements over the wider network to give a better distribution of delays by improving the queue balance.

13.12 Comprehensive microsimulation analysis using S-Paramics has been undertaken to model the future year scenario (2018) with development traffic. The analysis shows that overall, all development traffic in the future year 2018, including the proposed primary school, could be accommodated with the introduction of MOVA to such an extent that, overall queuing and delay would be less than the existing mini-roundabout junction arrangement without development traffic in 2018. The mitigation measure of signalisation with MOVA ensures better than „nil detriment“ impact on the road network with development traffic in place in 2018. In effect the highway conditions would improve even with development traffic in place.

13.13 Furthermore, with signalisation a pedestrian phase and facilities can be accommodated at this junction where at present there are none. This will not only benefit the local area as a whole but it will also provide an important function in facilitating pedestrian and cycle access to the proposed school off Woodside Road. This will provide significant safety improvements at the junction.

13.14 A report setting out the S-Paramics analysis of the MOVA controlled traffic signal junction was presented to Hertfordshire County Council Highways in September 2012. An email response was sent on the 19th November 2012 (attached as Appendix 3) which agrees that the principle of school and residential traffic generated from the site could be accommodated with the implementation of the MOVA controlled signals which would provide the additional benefit of safer crossings for pedestrians.

13.15 In summary, with the implementation of off-site highway mitigation measures, the site at Woodside Road is a readily available and viable site that can accommodate the identified short-medium term demand for primary school provision for Abbots Langley, and it is also the preferred site for Hertfordshire County Council. The proposed Woodside Road site is ideally located to enable safe and convenient access by all modes.

Site S(d) Croxley Green – land north east of Baldwins Lane

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6001 6/30 010/ Sd/4	Croxley Green Sd Residents Association	<p>The TRDC Local Plan Site Allocation document states in 1.8 that it has been prepared taking into account: • Government legislation and national planning policy • The East of England Plan • The adopted Core Strategy for Three Rivers • Responses from earlier stages of consultation • Sustainability Appraisal and Strategic Environmental Assessment • The Three Rivers and Hertfordshire Sustainable Community Strategies • A series of research documents known as the evidence base • The plans and strategies of surrounding authorities and other bodies.</p> <p>It is stated in 2.1.3 that the Core Strategy Spatial Strategy sets out that all development sites will be identified having regard to a criteria-based approach, taking into account whether development on the site: Will be accessible to public transport, services and facilities, • Will not have a significant impact on the environment including in terms of impacts on the Green Belt, visual amenity, heritage assets, transport and environmental quality including wildlife,...</p> <p>It is stated in 3.3 that: Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether: • Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits when assessed against the policies of the National Planning Policy Framework taken as a whole; or • Specific policies in that Framework indicate that development should be restricted.</p> <p>It is stated in 3.4 that: All development will be assessed in accordance with planning policy in the National Planning Policy Framework, the Core Strategy and Development Management Policies documents and any subsequent local plan documents.</p> <p>1. These are impressive reference points but all have been completely and utterly disregarded by a Local Planning Authority "LPA" that has been ordered by Herts. County Council / the Education Authority, to allocate Green Belt sites for secondary schools in specific areas of the district. In the specific instance of the Croxley Green Green Belt site, local residents responded in record numbers in pointing out to its LPA that all the key factors in maintaining a Green Belt site would be broken including the vanquishing of a site that separates 2 distinct areas of conurbation (Watford and Croxley Green).</p> <p>The TRDC Executive Committee was advised by the TRDC Director of Community and Environmental Services that it was incumbent on the Council to recognise the requirements of the County Council as the Local Education Authority and identify secondary school sites to meet the secondary school needs of the District. There was no discussion on National Planning Policy Framework issues and it is therefore the view of the CGRA that the Site Allocations process is utterly meaningless when it comes to the allocation of sites for schools.</p> <p>Additionally, the manipulation of National Policy phrases in the Green Belt section of the Local Plan Development Management Policies is a cynical manoeuvre designed to justify the actions of TRDC. In the new Local Plan TRDC has replicated National Planning Policy in stating that, "within the Green Belt, except in very special circumstances, approval will not be given for new buildings other than those detailed in national or other relevant guidance". School buildings, for example, are not a very special circumstance as per the National Planning Policy Framework. However, the document goes on to state that "where sites are allocated for development in the Site Allocations Local Development Document, this may represent very special circumstances." This is a new clause.</p> <p>Neither TRDC or the Local Education Authority has given or published any (specific or non specific) "very special circumstances" for the siting of buildings on Green Belt Land in any document relating to site allocations.</p> <p>It is observed that including that sentence in the Local Plan is not in compliance with the spirit and intention of National Guidance. The new, simplified, National Planning Policy Framework makes this quite clear.</p> <p>2. In fact, the TRDC's public consultation documentation on Site Allocations made no mention as to why the Local Education Authority had earmarked the Croxley Green site as a "must have" site and gave no information about the Green Belt Policy attributes that should form a significant part of the LPAs (and also Planning Inspector's) deliberations when a planning application is determined. There was no reference to the Green Belt status of this site in the statutory bodies response to consultation.</p> <p>Such omissions of basic planning information imply bias on the part of TRDC, which surely isn't the intention of the Site Allocation process. It is the contention of the CGRA that TRDC did not provide sufficient consultative information to residents because the Green Belt Planning Policy information that was withheld did not support the allocation of a school site. The public consultation response, whatever its size or views on planning policies issues, was never going to be a contributory factor in the decision making process of TRDC.</p> <p>If school sites are to be identified by the Local Education Authority and forced through the Site Allocation process, effectively trumping the National Planning Policy Framework, then this dictatorial process should be clarified in the Public consultation process.</p> <p>3. Supporting evidence for the view of the CGRA in points 1&2 is that the Secretary of State has (in</p>	<p>No change required.</p>	<p>The need to provide additional secondary school places in the District and the absence of alternative deliverable non-Green Belt sites (as demonstrated by local evidence) may constitute very special circumstances which would be required for development to take place in the Green Belt.</p> <p>The detailed impact of development on the area would be assessed through the planning application process.</p> <p>The site has been identified taking into account the results of several consultations and technical reports undertaken by HCC including on the need for school places.</p>	<p>No change considered necessary.</p>
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September 20102) rejected the planning appeal against the decision made by East Herts District Council to refuse the proposed relocation of 2 secondary schools to a single Green Belt site near Bishop's Stortford because it would be inappropriate development in the "Green Belt".

<http://www.out-law.com/en/articles/2012/september/secretary-of-state-refuses-permission-for-700-new-homes-and-a-school-on-appeal/>

In the decision letter the Secretary of State considered that the proposal conflicted with Green Belt policy and the Green Belt purpose of assisting in safeguarding the countryside from encroachment.

In conclusion, The CGRA asserts that the Three Rivers Local Plan Site Allocations Proposed Submission is not in compliance with National Planning Policy Framework.

6002 5/30 014/ Sd/2	Rousebarn Investment Co Ltd	Sd	<p>We object to the education allocation Site S(d) Croxley Green – land to the north east of Baldwins Lane to meet the need for school places in this area for the following reasons:</p> <ul style="list-style-type: none"> - The site forms part of the Green Belt which maintains the distinction between the countryside and built up area. In addition to this, it also acts as an important strategic green wedge, preventing the coalescence of the two settlements of Croxley Green and Watford. We believe it is vital to preserve this physical separation in order to maintain the separate identity and local distinctiveness of Croxley Green from the larger settlement of Watford. - As detailed in the Town Planning Feasibility Report September 2011 prepared by Vincent and Gorbing, the site occupies the southern end of a broad ridge which slopes down to the south from levels of over 80m AOD on Jacotts Hill to the north. Levels within the site vary from around 70m AOD in the centre of the site to around 54m AOD along the southern site boundary. There is also a pronounced slope down to the west towards the urban edge and a gentler slope down to the east, towards the canal and the River Gade. In light of the above, it was concluded in the report that the topography of the site would severely constrain the potential of providing the full requirement of playing fields on the site. In addition, that the terracing of the site would be expensive and the visual impact would be unacceptable. The playing fields would need to be restricted to the flatter parts of the site adjacent to the school buildings and therefore any deficit made up through detached provision. We would suggest because of the significant topographical constraints on the site, and associated costs that it would be more comprehensive in planning terms if a site was selected elsewhere that could accommodate the school buildings and the full provision of playing fields. For the reasons as stated above, we believe Site S(d) Croxley Green land to the north east of Baldwins Lane is an unsuitable site for a secondary school. The evidence base does not support the allocation of this site. - The site is located directly adjacent to the railway line; it is proposed in the indicative layout that the school buildings will be located near to the railway line which may lead to unacceptable noise levels within the classrooms that will disrupt learning. We question whether significant buffers will be able to be provided to ensure acceptable noise levels as we are aware that the track will be used for stabling rollingstock. - The site is highly visible from the residential area to the west with only a narrow lane separating the school from the back gardens of dwellings located on Links Way. Additional noise generated from the school could impact on the adjoining dwellings, in addition would cause significant amenity issues such as loss of privacy, loss of light to rear gardens and visual impact. 	<p>Given the above, we would like to suggest a suitable alternative site:</p> <p>Site S(c) Croxley Green land to the north of Little Green Lane has previously been outlined as a contingency site for a secondary school in the Site Allocations DPD Consultation process in January 2011. Attached at Appendix 1 is a location plan of the land ownership referred to as land at Rousebarn Lane. We believe the site should be taken forward for a comprehensive scheme, which could include a secondary school, associated playing fields, housing and open space.</p> <p>It is noted from the Site Allocations Proposed Submission document that there are a number of small alterations proposed to the Green Belt boundary for housing allocations (see below) suggesting a disjointed approach to the planning of the local area. Arguably, if Site S(c) land to the north of Little Green Lane was brought forward for development, it would be a more comprehensive approach to the growth of Croxley Green. Located on the northern edge with residential development to the south, the land represents a good opportunity to provide a well-designed, accessible mixed use development and a suitable site for a secondary school. In addition, the site would be further enhanced by the opportunity of informal recreation (rights of way and woodland access) to enable public enjoyment of the countryside.</p> <p>In the Feasibility Report prepared by Vincent and Gorbing in September 2011, it was stated that access to Site S(c) land to the north of Little Green Lane could be provided via Links Way which is wide enough to accommodate traffic flows, including buses. This also provides a direct route to the site which would be suitable for school traffic flows; a circulation facility will have to be provided on site. If a more comprehensive development scheme was to be considered, a wider access strategy could be investigated using Lodge End and Rousebarn Lane to provide access for cars, buses, cyclists and pedestrians.</p> <p>We disagree to Site S(c) land to the north of Little Green Lane being categorised as</p>	<p>Site S(c) was subject to consultation in 2010 but following the results of this consultation and of detailed technical work carried out by the County Council the site is not considered appropriate for development of a secondary school. In particular the Council are concerned about the loss of good quality agricultural land and open countryside. Little Green Lane currently forms a clear Green Belt boundary that would be breached by development to the north. The Council are also concerned about the inadequate access to the site from Baldwins Lane, particularly for coaches and buses as highlighted in consultation responses.</p>	<p>No change considered necessary.</p>
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medium to high landscape quality within the report, and argue that as arable land the site (potential developable site area) is of low landscape quality. If the site was to be developed, the buildings could be designed to make a positive feature of the local environment and could also incorporate substantial areas of new planting and open space. Enhanced use of the site would make the area more attractive to the public and increase informal recreation opportunities.

Our client, the owners of the land are extremely willing to work with the Three Rivers District Council and Hertfordshire County Council in order to deliver the above. They would also be happy to discuss these representations in more detail if this would be of assistance to the District Council.

6002 4/30 013/ Sd/C	J Hawkins	Sd	<p>The paper states that vehicular access from Baldwins Lane is achievable within two parameters-(car parking spaces and the need to move Lodge Lane) but where will the car parking be moved to - - the local streets are already full with parked cars and why the need to move Lodge End and its affect on local Residents. And, has also been stated (to do with another project) land needs to found for the recreation ground that will be lost when the rail link is built.</p> <p>Unlike the other two sites this one is very confined with several roads junctions, shops and parked vehicles/manoeuvring vehicles for the shops etc. It also has very restricted sight lines under the railway bridge and also a steep hill on its approach from two roads.</p> <p>No mention is made regarding traffic travelling along residential roads (although this fact is highlighted re Long Lane) and thus an increase in all types of pollution, which will be a greater problem due to its confined location.</p> <p>No matter what planning aspects are put into the design of the buildings and the layout it will still have a very significant impact on local residents.</p> <p>With having such confined entrance/exit, which will necessitate the removal of nearly all of pavement on that side of the road, will there be any other egress from the site in case of an emergency that blocks that part of the way out onto Baldwins Lane.</p> <p>There is a comment about the A405/A412 site the area acts as a buffer between Mill End and Maple cross, but surely similar can be said for this area of Green Belt to act as a buffer between Croxley Green and Watford. This buffer will of even greater importance once the rail link is built with the visual affect that the rail viaduct will have on the area. Mention is made in comments about the above site about wildlife in the area, but this equally applies to the Baldwins Lane site. As well as grazing horse there are foxes, deer and badgers also on the site.</p>	No change required.	The access is indicative and has been identified through consultation with Hertfordshire Highways, however the detailed impact of development on the area would be assessed through the planning application process. The Comments section notes 'that this site is the greater part of a relatively small part of Green Belt separating Croxley Green and Watford and is not supported by the local community'.	No change required.
6008 5/30 024/ Sd/C	Hertfordshire Biological Records Centre	Sd	<p>The site is strategically important being within the corridor of the Gade / Grand Union Canal. HBRC holds ecological information on this site as a pasture that is grazed by horses and supports neutral grassland. A wooded / former orchard area is also present in the centre. The site also lies adjacent to the CWS Grand Union Canal (ref: 83/016); Cassiobury Park (ref: 83/038) beyond the canal to the east; and Jacotts Hill / West Herts Golf Course (ref: 83/002) to the north. The site lies within a KBA. Given the sites location, any development proposals should take full account of the existing ecological interest and role as part of the river corridor.</p>	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.

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6011 2/30 029/ Sd/1	S Sowden	Sd	<p>In brief these points are made against those that are set out in the Three Rivers District Council (TRDC) Local Plan Site Allocation. Most notably:</p> <p>-Para 1.8 – that is has been prepared taking into account Government Legislation and National Planning Policy, the East of England Plan, Responses from earlier consultations, Sustainability Appraisal and Strategic Environmental Assessment (amongst others)</p> <p>-Para 2.1.3 – that the Core Strategy Spatial Strategy sets out to take into account the impact on the environment including in terms of impact to the Green Belt, visual amenity, heritage assets, transport and environmental quality.</p> <p>-Para 3.3 – that all development will be assessed in accordance with planning policy in the National Planning Policy Framework, the Core Strategy and Development Management Policies documents and any subsequent local plan documents.</p> <p>I do not believe that TRDC have taken into account their own planning and development policies when making the decision to mark Baldwins Lane as their preferred school site in the west of the district. There was an overwhelming negative response to this site for various reasons none of which have been addressed or been taken into account in the decision making process. It is the last bit of Green Belt land separating Watford and Croxley Green and goes against the National Planning Policy framework, where school buildings are not a very special circumstance. At no point has Herts County Council or TRDC given in writing or otherwise their reasons for wanting to build on Green Belt land. Nor have they addressed the concerns of the residents in this area in terms of transport, roads, wildlife, heritage or pollution. These remain un-addressed.</p> <p>As a resident whose house would back onto Site (d) this school was a forgone conclusion and did not come up in my planning search carried out by TRDC. They did recommend I look up the Local Development Plan, but little did I know that the process would not be a transparent one and that regardless of the public consultation the Council would still go ahead with, in their own words, building on an 'unacceptable site'</p> <p>I think it's also worth noting that the shortage of school places will be in the Rickmansworth area, and that is why a new school was proposed, ideally in the Sites (a) and (b). To now build one on the Watford/Rickmansworth border will allow the council to accommodate children from outside of the TRDC. If Watford is short on school spaces then I would like to understand why a school is not being proposed in Watford...</p> <p>All these questions are left unanswered.</p> <p>As a final point I have also recently seen the new planning application from London Underground for this Land which includes not only the school, but a park and housing. This was not in the Site Allocation Plan and further points would have been issued by myself and many of the other objectors should we have seen these at the consultation stage.</p> <p>In conclusion I find the Three Rivers Local Plan Site Allocations Proposed Submission is not transparent and is not compliant with the National Policy Planning Framework.</p>	Omission of site S(d).	<p>The need to provide additional secondary school places in the District and the absence of alternative deliverable non-Green Belt sites (as demonstrated by local evidence) may constitute very special circumstances which would be required for development to take place in the Green Belt.</p> <p>The detailed impact of development on the area would be assessed through the planning application process.</p> <p>The site has been identified following the results of several consultations and technical reports undertaken by HCC. The proposed site would help to meet the growing pressures of providing school places in both Three Rivers and Watford.</p>	No change considered necessary.
6011 1/30 028/ Sd/2	R Ayris	Sd	<p>If this proposal for a Secondary School to be built on GREEN BELT LAND at the bottom of Baldwins Lane goes ahead I will be very upset along with my family.</p> <p>I live on Baldwins Lane, I have done so for 35 years, I am 36 years old and I have grown up living in Baldwins Lane. The proposed site for this school to be built is firstly and importantly GREEN BELT LAND and secondly it is a beautiful paddock where I often see horses enjoying the Green Belt fields.</p> <p>I am expressing my views, but I bet myself and the general public will not be listened to and will be ignored like per usual. If someone high up makes a decision they do not think about what the general public think they just suit their selves and do not care about the views of other people.</p> <p>It does not stop there. I used to go to, in my opinion, a very very good Secondary School in Croxley Green, you could say it was located at the top of Baldwins Lane called Durrants School until it was closed down. I was there at the time it closed and had to be transferred to Langleybury School. Between the two schools I would say Durrants was much better than Langleybury. Durrants School had extremely good facilities, it had everything. The main school building was a lovely old traditional school building it contained a lovely hall. Durrants had a great canteen, music block, art block, home economics block, science block, history block. It also had its own gymnasium with an outdoor swimming pool and large plot of land of playing fields for netball, hockey, tennis courts and athletics. The parents and the staff fought long and hard to save the school but the authorities didn't listen and guess what Durrants School was raised to the ground and houses built on the land, does not make any sense. It is pretty obvious that if you knock a school down, build houses on the land, young families will move in and then years later those children will need a school to go to. What a waste of a really great school.</p> <p>If this school is built on this proposed site Durrants would have been knocked down for nothing because it means that if Durrants had not been knocked down, if Durrants was still here to this day there would be no need for another school.</p>	Omission of site S(d).	<p>The need to provide additional secondary school places in the District and the absence of alternative deliverable non-Green Belt sites (as demonstrated by local evidence) may constitute very special circumstances which would be required for development to take place in the Green Belt.</p> <p>The detailed impact of development on the area would be assessed through the planning application process.</p> <p>The site has been identified following the results of several consultations and technical reports undertaken by HCC. The proposed site is in an ideal location in terms of helping to meet the growing pressures of providing school places in both Three Rivers and Watford.</p>	No change considered necessary.

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Green Belt means exactly that Green Belt which is lovely countryside which should not be built on and should be left as unspoilt land for nature and should be left well alone. If Green Belt is built on barriers will be lifted and where will it end, eventually there will be no Green Belt and countryside left which is totally wrong.

What about the traffic problems!! It is congested enough at the bottom of Baldwins Lane as it is with the shops being there, this would be ten times worse. Also there is plans for the Rail Link to go across that same site. It would mean everything would merge into one place which is asking for trouble.

Please, please just leave it well alone, leave it as it is as a beautiful peaceful paddock for the horses and people to enjoy and admire as GREEN BELT LAND.

6011 8/30 035/ Sd/2	P Rennoldson	Sd	<p>We are somewhat bemused by all of the documents that supposedly make this Site Allocation document legally compliant and to be 'of soundness'.</p> <p>We completed the various consultation documents, the first some 2 years ago and the second earlier this year and, we believe, both results of the consultation showed that a new secondary school should not be built on Green Belt Land on the Baldwin Lane Site in Croxley Greens. We consider this to be quite clear and confirms that, if Localism is to be considered then a new school will not be built BUT: -</p> <p>1. Why has the Local Education Authority earmarked the Croxley Green site as a 'must have' site and has given no information about the Green Belt Policy that should form a significant part of Local Planning Authority deliberations when a planning application is determined?</p> <p>2. In the Local Plan, TRDC has stated that 'within the Green Belt, except in very special circumstances, approval will not be given for new buildings other than those detailed in national or other relevant guidance. School buildings, for example, are not a very special circumstance as per the National Planning Policy Framework. In conclusion, we do not consider the Three Rivers Local Plan Site Allocations Proposed Submission is not in compliance with National Planning Policy Framework.</p>	No change required.	<p>The need to provide additional secondary school places in the District and the absence of alternative deliverable non-Green Belt sites (as demonstrated by local evidence) may constitute very special circumstances which would be required for development to take place in the Green Belt.</p> <p>The detailed impact of development on the area would be assessed through the planning application process.</p> <p>The site has been identified following the results of several consultations and technical reports undertaken by HCC. The proposed site would help meet the growing pressures of providing school places in both Three Rivers and Watford.</p>	No change required.
6016 5/30 042/ Sd/2	CPRE Hertfordshire	Sd	<p>This Secondary School Allocation is in the Green Belt. No very special circumstances have been demonstrated to support its development for school use.</p> <p>The Council's proposed change conflicts with Green Belt policy in the NPPF and is therefore unsound.</p>	This allocation should be deleted.	<p>The need for a secondary school in this area of the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt.</p> <p>The site has been identified following the results of several consultations and technical reports undertaken by HCC.</p> <p>The detailed impact of future development on the site would be assessed through the planning application process.</p>	No change considered necessary.
6024 9/30 055/ Sd/C	Environment Agency	Sd	<p>You should be aware that the area identified as the 'building zone' is located in an area of very high groundwater (evidence of this is in the adjacent watercress beds), which has been identified as an area at risk of groundwater and associated surface water flooding in the Level 2 Strategic Flood Risk Assessment (prepared by Halcrow for Three Rivers District Council, 2012). It may be necessary to relocate the building zone to reduce the risk of flooding to the school.</p>	Relocation of the building zone to reduce the risk of flooding to the school.	<p>A flood risk assessment would be required to support planning applications on the site. The detailed impact of future development would be assessed through the planning application process. The building zone is indicative and would be refined as part of any planning application.</p>	No change considered necessary.

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Site S(b) Mill End/Maple Cross – Froghall Farm and adjoining land

6001	Highways Agency	Sb	<p>The Agency has concerns regarding the proposed site allocation for a secondary school in the west of the District at Mill End/Maple Cross. (Page 38 of Local Development Document proposed submission). Whilst I understand the reason why this site remains one of the preferred sites to provide a secondary school in the District, I remain concerned of the likely traffic impact on the M25 Motorway Junction 17 during morning peak hour periods.</p> <p>If the site does come forward, then the detailed assessment work must include a transport assessment focussing on the nearby motorway junction with appropriate mitigation measures in place, if considered appropriate.</p>	n/a	<p>Comment noted. Transport modelling work was undertaken jointly with Watford Borough Council to assess the impact of proposed development on the highway and was agreed by the Highways Agency. Highway issues would be assessed in more detail at the planning application stage. Further information on Transport Assessments, Transport Statements and Travel plans required for developments are detailed in the Development Management Validation Checklist for Planning Applications.</p>	No change necessary.	considered
6004	Mr S Burbery	Sb	<p>We are objecting to the plan.</p> <p>1) In respect of Education Site S(b) it has been established that having regard to all the technical information undertaken to date including the Sustainability Appraisal this site should not be included as a site to be considered further.</p> <p>2) Site S(b) is not deliverable.</p> <p>3) The purpose of the Sites Allocation Document is to be specific where development is to be provided. The reference to site S(b) is merely that it is to be considered further pending additional reports. The council have had long enough to prepare all the reports necessary to determine this through the Sites Allocation process. The fact that Three Rivers Council in the absence of any overriding technical evidence to the contrary continue to include Site S(b) makes the plan unsound as there is no technical evidence which supports this is justified compared with an alternative.</p> <p>4) The plan has not been positively prepared as there is ambiguity in relation to the School Site Allocation.</p>	Deletion of para. 6.10-6.14 inclusive and removal of site S(b) on page 37.	<p>The County Council have requested the allocation and reservation of two secondary schools- one site in Mill End/ Maple Cross and one site in Croxley Green. The District Council considers that site S(b) is a more appropriate site compared to site S(a) as it would have less impact on the landscape and Green Belt as a whole.</p>	No change necessary.	considered
6022	Kennet Properties	Sb	<p>KPL have no objection in principle to provision being made for a secondary school on land in the vicinity of Mill End / Maple Cross / Froghall Farm. However they have concerns about the extent of the proposed site boundary, which as drawn incorporates the proposed employment allocation site E(d).</p> <p>There is a requirement for the Maple Cross industrial estate to expand as demonstrated by the Local Plan evidence base and an objective assessment of need. The proposed allocation Site E(d) is the only practicable and logical location for an extension of the industrial estate. It is therefore critical that any provision made for a new secondary school does not compromise its delivery.</p> <p>There remains considerable uncertainty about the size of secondary school that may ultimately be required either on Site S(b) or on the alternative Site S(a). KPL considers that further work is essential to determine accurately the number of students that need to be accommodated, and from this identify the actual built space and playing fields requirements before any allocation is made.</p> <p>Based on consideration of other secondary school sites in Hertfordshire, KPL's view is that the site boundary for the school should be re-drawn to include only the land identified on Plan S(b) as 'building zone' and as 'playing fields'. If ultimately a larger school is required, then either the intervening land at Froghall Farm (currently excluded from the site boundary) can be included in Site S(b); or the alternative site S(a) can be confirmed as the preferred location for the school.</p> <p>A further consideration is that the TW land identified for use as playing fields on Plan S(b) has previously been used in connection with the operation of the Maple Lodge sewage treatment works. An amount of remediation will therefore be required to allow it to be used as a school. The costs associated with remediating the land are likely to be significant and could impact on the viability of the delivery of a school if they are not offset. An area of development land is therefore required over and above to offset the costs of remediation.</p> <p>In the event that the school is located on site S(a), it is considered that remediation of the wider TW land holding would still be beneficial as this would allow the land to be made available for public / community / recreational use. An amount additional development land would therefore still be required under this alternative scenario to offset the remediation costs.</p>	Site boundary for the school redrawn to only include the land identified as 'building zone' and 'playing fields'.	<p>To ensure the long term and sustainable planning of the area a planning brief will be prepared for the Froghall Farm/ Maple Lodge site.</p> <p>The size and layout of the secondary school and the detailed impact of future development would be assessed through the planning application process and providing a wider site boundary provides flexibility for the plan to deal with changing circumstances.</p>	No change necessary.	considered

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6015 5/30 041/ Sb/2	Rickmansworth Residents' Association	Sb	The proposal to produce a planning brief for the whole Maple Cross site, described in the next paragraph, adds to the uncertainty and potentially will lead to further delay. The Association is seriously concerned that the continued uncertainty about suitable school sites will lead to a massive shortfall in secondary school places over the next 6 or 7 years. The comments in the submission document that a Planning Brief will be prepared for the Froghall Farm/Maple Lodge site leads the Association to conclude that there is a great risk of yet further delay in the provision of a permanent new secondary school serving Rickmansworth. The probability that compulsory purchase powers will need to be invoked for any site adds to the risk of delay and increases the likely length of any delay.	No change required.	The lack of a planning brief for Froghall Farm/Maple Lodge would not prevent planning applications from being submitted to the Council and being assessed and determined against relevant planning policies of the Local Plan. The purpose of creating a planning brief is to ensure the long term and sustainable planning of the area. The Council will endeavour to produce the document as soon as possible.	No change required.
6011 0/30 027/ Sb/1	WD3 School Action Group	Sb	In order to be sound, the Plan should be clear and transparent. As it is currently worded, there is every possibility that the reader may not note that the Plan allows part of the Maple Cross/Maple Lodge site to be used for both employment and education purposes. The south-eastern part of the Maple Cross/Maple Lodge site E(d) between Hertford Place and Maplelodge Farm has been specifically allocated as part of a possible Froghall Farm Secondary School site S(b). This connection is not clear when reading the Plan. Thus, the WD3SAG suggests that this is highlighted in the relevant sections of the Plan to maximise transparency and understanding.	Section 5.10 should read instead: Details of individual allocated employment sites are set out below. Appendix 2 shows employment allocations alongside all other allocations by parish area. The south-eastern sector of Site E(d) has also been allocated for a possible Secondary School site (see Section 6.13). Section 6.13 should read instead: Therefore, in the south west of the District, two sites are allocated: Y Site S(b) Mill End/Maple Cross - Froghall Farm and adjoining land (the District Council's preferred site in the west of the District). Some of this allocation has also been reserved for employment as part of the Maple Cross/Maple Lodge allocation of site E(d) (see Section 5); and Y Site S(a) Mill End/Maple Cross - Land east of A405/north of A412 (the County Council's preferred site in the west of the District).	Comments on the relevant sites highlight that a planning brief will be prepared for this site to ensure the long term and sustainable planning for the area.	No change considered necessary.
6001 1/30 008/ Sa/C	Highways Agency	Sb	the Agency has concerns regarding the proposed site allocation for a secondary school in the west of the District at Mill End/Maple Cross. (Page 38 of Local Development Document proposed submission). Whilst I understand the reason why this site remains one of the preferred sites to provide a secondary school in the District, I remain concerned of the likely traffic impact on the M25 Motorway Junction 17 during morning peak hour periods. If the site does come forward, then the detailed assessment work must include a transport assessment focussing on the nearby motorway junction with appropriate mitigation measures in place, if considered appropriate.	n/a	Comment noted. Transport modelling work was undertaken jointly with Watford Borough Council to assess the impact of proposed development on the highway and was agreed by the Highways Agency. Highway issues would be assessed in more detail at the planning application stage. Further information on Transport Assessments, Transport Statements and Travel plans required for developments are detailed in the Development Management Validation Checklist for Planning Applications.	No change considered necessary.
6002 1/30 012/ Sb/C	LB Hillingdon	Sb	We note that the proposed school site abutting Hillingdon's boundary is still subject to determination on educational need by the County. We would wish to be informed of any confirmation of proposals and any likely impacts on traffic generation and on educational provision in Hillingdon. We note also the proximity of the eastern boundary to our Nature Conservation site (Metropolitan Grade 1) and the proximity of site's south east corner to a Nature Reserve. We will need to be assured that developmental of the site would not have any unacceptable impacts on these environmental designations	No change required.	Comment noted.	No change required.
6002 2/30 013/ Sb/C	J Hawkins	Sb	as stated there would be a low impact on local residents, but surely the vehicular access is far easier to manage onto a roundabout-or thereabouts with much better site lines and an open aspect.	No change required.	The access is indicative and has been identified through discussion with Hertfordshire Highways, however the detailed impact of development on the area would be assessed through the planning application process.	No change required.

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6003 9/30 021/ Sb/2	Mr C Edwards	Sb	<p>We are objecting to the plan.</p> <p>1) In respect of Education Site S(b) it has been established that having regard to all the technical information undertaken to date including the Sustainability Appraisal this site should not be included as a site to be considered further.</p> <p>2) Site S(b) is not deliverable.</p> <p>3) The purpose of the Sites Allocation Document is to be specific where development is to be provided. The reference to site S(b) is merely that it is to be considered further pending additional reports. The council have had long enough to prepare all the reports necessary to determine this through the Sites Allocation process. The fact that Three Rivers Council in the absence of any overriding technical evidence to the contrary continue to include Site S(b) makes the plan unsound as there is no technical evidence which supports this is justified compared with an alternative.</p> <p>4) The plan has not been positively prepared as there is ambiguity in relation to the School Site Allocation.</p>	Deletion of para. 6.10-6.14 inclusive and removal of site S(b) on page 37.	The County Council have requested the allocation and reservation of two secondary schools- one site in Mill End/ Maple Cross and one site in Croxley Green. The District Council considers that site S(b) is a more appropriate site compared to site S(a) as it would have less impact on the landscape and Green Belt as a whole.	No change considered necessary.
6004 0/30 022/ Sb/2	Mr A Wilson	Sb	<p>We are objecting to the plan.</p> <p>1) In respect of Education Site S(b) it has been established that having regard to all the technical information undertaken to date including the Sustainability Appraisal this site should not be included as a site to be considered further.</p> <p>2) Site S(b) is not deliverable.</p> <p>3) The purpose of the Sites Allocation Document is to be specific where development is to be provided. The reference to site S(b) is merely that it is to be considered further pending additional reports. The council have had long enough to prepare all the reports necessary to determine this through the Sites Allocation process. The fact that Three Rivers Council in the absence of any overriding technical evidence to the contrary continue to include Site S(b) makes the plan unsound as there is no technical evidence which supports this is justified compared with an alternative.</p> <p>4) The plan has not been positively prepared as there is ambiguity in relation to the School Site Allocation.</p>	Deletion of para. 6.10-6.14 inclusive and removal of site S(b) on page 37.	The County Council have requested the allocation and reservation of two secondary schools- one site in Mill End/ Maple Cross and one site in Croxley Green. The District Council considers that site S(b) is a more appropriate site compared to site S(a) as it would have less impact on the landscape and Green Belt as a whole.	No change considered necessary.
6008 6/30 024/ Sb/C	Hertfordshire Biological Records Centre	Sb	<p>The site boundary includes an area west of Springfield lake and the River Colne which is dominated by rough grassland. It includes a CWS Maple Lodge Marsh (ref 88/008), an area of wet, rough neutral grassland which supports areas of species-rich marsh habitat characterised by rushes. The southern section lies within a KBA. We do not hold any ecological data for the northern section of the site. It is noted that the northern section is proposed for building and the southern section as playing fields. Both these areas exclude the CWS Maple Lodge Marsh. The open grassland in the northern section may be of ecological value and would need to be properly assessed if development was proposed. Any development should involve proposals to manage and improve the CWS Maple Lodge Marsh. There are records of protected species present on the site.</p>	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.

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6016 4/30 042/ Sb/2	CPRE Hertfordshire	Sb	<p>This Secondary School Allocation is in the Green Belt. No very special circumstances have been demonstrated to support its development for school use. An Employment Allocation is also proposed on part of the site.</p> <p>The Council's proposed change conflicts with Green Belt policy in the NPPF and is therefore unsound.</p>	This allocation should be deleted.	<p>The need for a secondary school in this area of the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt.</p> <p>The site has been identified following the results of several consultations and technical reports undertaken by HCC.</p> <p>The detailed impact of future development on the site would be assessed through the planning application process.</p>	No change considered necessary.	
6018 5/30 050/ Sb/C	Thames Water Utilities Ltd	Sb	<p>With regard to the school sites S(a) and S(b), it should be noted that there are existing sewerage assets (sewers) running across the sites which will need to be taken into consideration when determining the layout of built development. New built development will need to be aligned to ensure that a minimum of 3m is provided to either side of the existing sewers flowing through the site.</p> <p>Assessment work will also need to be undertaken by developers to ensure that occupiers of the site will not be subject to odour nuisance. If amenity is considered acceptable by the local planning authority then we would request that any proposed mitigation that is set out in the assessment is controlled via a planning condition.</p>	No change required.	<p>Comment noted. The detailed impact of future development would be assessed through the planning application process.</p>	No change required.	
6025 0/30 055/ Sb/C	Environment Agency	Sb	<p>This area is rich in biodiversity. The river (chalk stream) and lake systems nearby, as well as the floodplain grazing marsh that makes up much of the surrounding land are identified as Biodiversity Action Plan habitats, and their loss or degradation would be strongly opposed.</p> <p>An additional line should be added to the comments to indicate that we would expect there to be significant environmental/ecological enhancements along the whole course of the river if development were to proceed here.</p> <p>The comments should also specifically mention the requirement for a minimum 8m buffer zone adjacent to the watercourses on the site (complying with the requirements set out in our covering letter). The buffer zone could also form a key educational tool for the school.</p>	Further comments should be added	<p>Comments section updated to include 'Minimum of 8m buffer must be provided to watercourses on site.' The detailed impact of future development would be assessed through the planning application process. It is not considered necessary to add further detail.</p>	Comments section updated to include ' Minimum of 8m buffer must be provided to watercourses on site. '	
Site S(a) Mill End/Maple Cross – Land east of A405/north of A412							
6002 3/30 013/ Sa/C	J Hawkins	Sa	<p>Reference is made to traffic along Long Lane, but if the entrance was moved to the roundabout area this aspect would no longer be of concern and as per site above the area is far more open with better site lines etc, and fewer junctions to cause major problems.</p>	No change required.	<p>The access is indicative and has been identified through consultation with Hertfordshire Highways, however the detailed impact of development on the area would be assessed through the planning application process.</p>	No change required.	
6008 7/30 024/ Sa/C	Hertfordshire Biological Records Centre	Sa	<p>HBRC holds no ecological information for the majority of the site with the exception of the CWS Uxbridge Road Verge (ref: 88/009) designated for the presence of a nationally vulnerable plant species. The site currently comprises open agricultural land. An ecological assessment should be undertaken as part of any application and measures to protect and enhance the on-site CWS will be required.</p>	No change required.	<p>Comment noted. The detailed impact of future development would be assessed through the planning application process.</p>	No change required.	

SCHEDULE OF REPRESENTATIONS

6016 3/30 042/ Sa/2	CPRE Hertfordshire	Sa	<p>This Secondary School Allocation is in the Green Belt. No very special circumstances have been demonstrated to support its development for school use.</p> <p>The Council's proposed change conflicts with Green Belt policy in the NPPF and is therefore unsound.</p>	<p>This allocation should be deleted.</p>	<p>The need for a secondary school in this area of the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt.</p> <p>The site has been identified following the results of several consultations and technical reports undertaken by HCC.</p> <p>The detailed impact of future development on the site would be assessed through the planning application process.</p>	<p>No change considered necessary.</p>
6018 6/30 050/ Sa/C	Thames Water Utilities Ltd	Sa	<p>With regard to the school sites S(a) and S(b), it should be noted that there are existing sewerage assets (sewers) running across the sites which will need to be taken into consideration when determining the layout of built development. New built development will need to be aligned to ensure that a minimum of 3m is provided to either side of the existing sewers flowing through the site.</p> <p>Assessment work will also need to be undertaken by developers to ensure that occupiers of the site will not be subject to odour nuisance. If amenity is considered acceptable by the local planning authority then we would request that any proposed mitigation that is set out in the assessment is controlled via a planning condition.</p>	<p>No change required.</p>	<p>Comment noted. The detailed impact of future development would be assessed through the planning application process.</p>	<p>No change required.</p>
6001 1/30 008/ Sa/C	Highways Agency	Sa	<p>The Agency has concerns regarding the proposed site allocation for a secondary school in the west of the District at Mill End/Maple Cross. (Page 38 of Local Development Document proposed submission). Whilst I understand the reason why this site remains one of the preferred sites to provide a secondary school in the District, I remain concerned of the likely traffic impact on the M25 Motorway Junction 17 during morning peak hour periods.</p> <p>If the site does come forward, then the detailed assessment work must include a transport assessment focussing on the nearby motorway junction with appropriate mitigation measures in place, if considered appropriate.</p>	<p>No change required.</p>	<p>Comment noted. Transport modelling work was undertaken jointly with Watford Borough Council to assess the impact of proposed development on the highway and was agreed by the Highways Agency. Highway issues would be assessed in more detail at the planning application stage. Further information on Transport Assessments, Transport Statements and Travel plans required for developments are detailed in the Development Management Validation Checklist for Planning Applications.</p>	<p>No change considered necessary.</p>

7.0 Retail Allocations

Policy SA4: Retail Allocations

Site R(a) Rickmansworth Town Centre

Site R(b) South Oxhey

SCHEDULE OF REPRESENTATIONS

6001 8/30 011/ Rb/1	Barclays Bank	Rb	<p>As part of the complete redevelopment of South Oxhey Town Centre, Barclays continue to support the promotion of retail development in line with Policy SA4. We reiterate our comments in relation to this policy in the Pre-Submission Site Allocations (2012) document. Barclays continue to be strongly committed to maintaining their presence within the redeveloped District Centre as the Bank provides an established and essential service to South Oxhey.</p> <p>Barclays support the addition of the encouragement of “uses complimentary to the Local Centre and Local Shops” within this policy and consider that bank uses will provide a vital complimentary use to support the commercial and residential uses proposed in South Oxhey. This will establish a vibrant and sustainable local community in line with the aspirations of the adopted Core Strategy (2011) and National Planning Policy Framework (2012).</p>	<p>In our representations to the Pre-Submission Site Allocations (2012) document, we identified that the 51 Prestwick Road branch of Barclays Bank is allocated as part of the secondary retail frontage in the site plan ref. R(b), but this plan was out of date. We requested that this plan was updated in the Proposed Submission Site Allocations document to reflect the South Oxhey Masterplan to provide further clarity on the sites allocated for different uses within the Centre.</p> <p>We note that the site plan ref. R(b) remains unchanged in the Proposed Submission Site Allocations document, again allocating 51 Prestwick Road for secondary retail use. However the South Oxhey Land Use Plan (page 66) allocates the site for “employment” use with “key active frontages for retail and community uses”.</p> <p>Barclays formally request that greater clarity is provided so that both plans correlate in the uses that they allocate for this site and that greater flexibility is provided to ensure that bank uses will be provided within the redevelopment of South Oxhey Town Centre, either on the same site or elsewhere in the centre.</p> <p>In addition to the suggested amendments to the Land Use Plan stated below, Barclays therefore request that the following alterations are made to the key to site plan ref. R(b): “Primary frontage: retail and supporting services” and “Secondary frontage: retail and supporting services”. This will ensure that the plan is positively prepared, justified, effective and thus sound.</p>	<p>The 'Comments' section on site R(b) notes that the frontage may be reviewed in future as part of any masterplan for the South Oxhey area. While the South Oxhey land use plan provides indicative uses, until detailed proposals have been agreed it is not possible to identify specific frontages.</p> <p>The land use plan indicative uses are considered sufficiently flexible to provide for a range of town centre uses as part of detailed proposals.</p> <p>However to provide clarity the following alterations are proposed to the land use plan to refer to: “Mixed Use: Community, retail, supporting services and offices with residential above” and “key active frontages for retail, supporting services and community uses”.</p>	<p>Amend land use plan legend on page 66 to “Mixed Use: Community, retail, supporting services and offices with residential above” and “key active frontages for retail, supporting services and community uses”.</p>
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Site R(c)

Site R(d)

Site R(e)

Site R(f)

Site R(g)

Site R(h)

8.0 Open Space Allocations

Policy SA5: Open Space Allocations

6016 6/30 042/ SA5/ 2	CPRE Hertfordshir e	SA5	<p>This policy omits the allocation of an isolated area of Green Belt (which results from GB(1) – see our objection to this allocation). In order to protect this isolated area of land for an open use consistent with its Green Belt Allocation, it should also be allocated as Open Space.</p>	<p>Include a new Open Space Allocation for the isolated area of Green Belt land resulting from allocation GB(1).</p>	<p>It is not clear what area is being referred to. Land east of the studios has planning permission for housing and open spaces to the north and north west of the studios are allocated as open spaces.</p>	<p>No change considered necessary.</p>
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Site OS(a)

6008 8/30 024/ Osa/ C	Hertfordshir e Biological Records Centre	Osa	<p>HBRC holds ecological information on this site. The site comprises a woodland dominated by ash and beech. We have records that some beech trees are over 100 years old. HBRC would be looking to ensure that any designation and subsequent use does not degrade the ecological value of the woodland.</p>	<p>No change required.</p>	<p>Comment noted. The detailed impact of future development would be assessed through the planning application process.</p>	<p>No change required.</p>
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SCHEDULE OF REPRESENTATIONS

Site OS(b)						
6008 9/30 024/ Osb/ C	Hertfordshire Biological Records Centre	Os	This area includes a CWS Chorleywood House Estate (ref: 82/013) and is largely a Local Nature Reserve (LNR). The site also lies within a KBA. The large site supports a mosaic of grassland and woodland and is described as 'ancient woodland with a semi-natural canopy'. The site also supports a number of records protected, rare and scarce species. HBRC would expect any proposals to ensure that the CWS was maintained and managed appropriately. Some of the open space areas are currently grazed by livestock and others have the potential to be grazed and this land use needs to be recognised and maintained if its ecological interest is to be retained.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
Site OS(c)						
6009 0/30 024/ Osc/ C	Hertfordshire Biological Records Centre	Os	HBRC hold some ecological information for this area in addition to the presence of protected species records. Use as opens space should not detract from any current ecological interest.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
Site OS(d)						
6009 1/30 024/ Osd/ C	Hertfordshire Biological Records Centre	Os	HBRC do not hold any ecological information for this site.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
Site OS(e)						
6009 2/30 024/ Ose/ C	Hertfordshire Biological Records Centre	Ose	HBRC does not hold any ecological information for this site and has no reason to object to this allocation.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
Site OS(f)						
6009 3/30 024/ Osf/ C	Hertfordshire Biological Records Centre	Osf	HBRC do not hold any ecological information for this site.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
Site OS(g)						
6009 4/30 024/ Osg/ C	Hertfordshire Biological Records Centre	Osg	Croxley Hall Wood is an CWS (ref: 89/008). The site supports ancient semi-natural acid broadleaf woodland and protected species. The site also lies in a KBA. HBRC would be looking for all woodland interest to be retained.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
Site OS(h)						
6009 5/30 024/ Osh/ C	Hertfordshire Biological Records Centre	Osh	The site includes the entire of CWS Long Valley Wood (ref: 83/040). This CWS is an area of ancient semi-natural broadleaved remnant woodland. The site also supports a number of protected and notable species and lies within a KBA. HBRC would be looking for all existing ecological interest to be retained and not degraded as a result of this allocation.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
Site OS(i)						

SCHEDULE OF REPRESENTATIONS

6009 6/30 024/ Osi/C	Hertfordshire Biological Records Centre	Osi	The site includes two CWSs: Pheasant's Wood (ref: 82/028), a large woodland with sections that are considered ancient and Solomon's Wood (ref: 82/027), an ancient semi-natural broadleaved open woodland. HBRC also hold ecological information on the grassland to the south west of Pheasant's Wood and the field at Berry Farm west of Pheasant's Wood as well as a number of protected and notable species. HBRC would be looking for all existing ecological interest to be retained and not degraded as a result of this allocation.	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
Site OS(j)						
6009 7/30 024/ Osj/C	Hertfordshire Biological Records Centre	Osj	Croxley Common Moor is a nationally important Site of Special Scientific Interest (SSSI) (a nationally important site for grassland heath), a Local Nature Reserve and KBA The site also includes the CWS Scrub north west of Croxley Common Moor (ref: 89/002/02). This site comprises a thin strip of unimproved acidic grassland and tall swamp vegetation between the River Gade and the Grand Union Canal. The site also supports a number of notable and protected species. Any proposals to designate this site as open space must be within the appropriate context of ensuring the ecological value of the site is maintained and enhanced as part of any proposals. This includes grazing management.	No change required.	Comment noted. The land is owned by the Council so will be maintained and enhanced appropriately.	No change required.
Site OS(k)						
6009 8/30 024/ Osk/ C	Hertfordshire Biological Records Centre	Osk	HBRC have no ecological information for the site itself, however it is close to an important site for protected species.	No change required.	Comment noted.	No change required.
Site OS(l)						
6009 9/30 024/ Osl/C	Hertfordshire Biological Records Centre	Osl	All of this site is included within the CWS Croxley Green Grassland (ref 83/013). The site comprises old heathy / acid grassland with several scarce and locally uncommon species. HBRC would be looking for the interest of the CWS to be maintained. This currently includes an appropriate mowing regime which should not be hindered by any such site allocation for use as open space. HBRC are surprised that Stones Orchard has not been included in this allocation.	No change required.	Comment noted. The land is owned by the Council so will be maintained and enhanced appropriately.	No change required.
Site OS(m)						
6010 0/30 024/ Osm/ C	Hertfordshire Biological Records Centre	Osm	This site is a CWS Harrocks Wood (ref: 83/012). The site supports ancient semi-natural broadleaved woodland and lies within a KBA. Notable and protected species are also present. HBRC would be looking for the interest of the CWS to be maintained and not degraded as a result of this allocation.	No change required.	Comment noted. The land is owned by the Woodland trust. The Council considers that the land would be continued to be maintained and enhanced appropriately.	No change required.
Site OS(n)						
6010 1/30 024/ Osn/ C	Hertfordshire Biological Records Centre	Osn	No HBRC ecological information for this site.	No change required.	Comment noted.	No change required.
9.0 South Oxhey						
6000 5/30 005/ 9/S	Hertsmere BC	9	We support the overall approach to the South Oxhey.	n/a	Support welcomed.	No change required.

SCHEDULE OF REPRESENTATIONS

Policy SA6: South Oxhey

60253 /3005 6/SA6 /C	Cllr F Button	SA6	I also refer to the proposed South Oxhey Regeneration which is very relevant to Carpenders Park. I would oppose any proposal to switch this employment use to South Oxhey and to relocate South Oxhey residential use to Carpenders Park, as has been suggested from time to time.	No change required.	Comment noted.	No change required.
60019 /3001 1/SA6 /1	Barclays Bank	SA6	<p>Barclays reiterate their representations to the Pre-Submission Site Allocations (2012) document in relation to Policy SA6.</p> <p>Barclays continue to support the promotion of South Oxhey District Centre as a Key Centre within Three Rivers and strongly support the aims of Policy SA6 to deliver the regeneration benefits to South Oxhey. Barclays reiterate that they are strongly committed to maintaining their presence within the regenerated Town Centre in order to contribute to these goals.</p> <p>Barclays Bank provides an established and essential service to South Oxhey. Ensuring that there is a range of retail and supporting services will contribute to the balance of uses necessary to support the proposed residential and commercial uses and provide local jobs, thus establishing a vibrant and sustainable local community in South Oxhey in line with the aspirations of the adopted Core Strategy (2011) and Draft National Planning Policy Framework (2012).</p> <p>Barclays support the inclusion of the South Oxhey Land Use Plan within the Proposed Submission Site Allocations DPD. We reiterate the comments of our letter of representation submitted to the Council on 6th June 2012 on behalf of Barclays Bank in relation to the Draft South Oxhey Initiative Masterplan.</p>	<p>We note that site plan ref. R(b) allocates the exiting Barclays 51 Prestwick Road branch as a "secondary frontage" and the South Oxhey Land Use Plan allocates the site for "employment" use with "key active frontages for retail and community uses". Barclays formally request that greater clarity is provided so that both plans correlate in the uses that they allocate for this site and that greater flexibility is provided to ensure that bank uses will be provided within the redevelopment of South Oxhey Town Centre, either on the same site or elsewhere in the centre.</p> <p>In addition to the suggested amendments to site plan ref. R(b) stated above, Barclays therefore request that the following alterations are made to the key to the Land Use Plan: "Mixed Use: Community, retail, supporting services and offices with residential above" and "key active frontages for retail, supporting services and community uses".</p> <p>This will ensure that the plan is positively prepared, justified, effective and thus sound.</p>	<p>The land use plan indicative uses are considered sufficiently flexible to provide for a range of town centre uses as part of detailed proposals.</p> <p>However to provide clarity the following alterations are proposed to the land use plan to refer to: "Mixed Use: Community, retail, supporting services and offices with residential above" and "key active frontages for retail, supporting services and community uses".</p>	<p>Amend land use plan legend on page 66 to "Mixed Use: Community, retail, <u>supporting services</u> and offices with residential above" and "key active frontages for retail, <u>supporting services</u> and community uses".</p>
60032 /3001 6/SA6 /2	Ms J Cushway	SA6	<p>[S] Proposed plan is in breach of the Localism Act 2011. Council leader position that only elected Councillors could participate in the planning process. Local residents have been encouraged to form local community forums, but not neighbourhood forums and consultation falls a long way short of the determination envisaged by the legislation.</p> <p>In relation to South Oxhey, TRDC withheld information re the Localism Act and manoeuvred around it to make sure local people did not get to determine the nature of development they wanted to see in their area.</p> <p>In 2011, public consultations and meetings were held and residents and businesses asked to comment on what changes they would like to see. The majority wanted shops refurbished and no more residential development. TRDC made no attempt to explain the Localism Act to residents, the legislation was not mentioned at all.</p> <p>After the initial consultation the preferred option of residents and businesses was refurbishment and no more residential development. TRDC then announced that a steering group was to be appointed, consisting of 7 councillors and the CEO of a local housing association. Only 2 councillors lived or worked in South Oxhey. South Oxhey has a population of 16000 and 25% representation is inadequate.</p> <p>Instead of encouraging the parish council to establish a neighbourhood forum and working together to find a consensus between residents and TRDC, the Council took it in house and the results of months of consultation were ignored. At best TRDC made some inconsequential adjustments or adjustments for serious oversights such as buying an extremely busy petrol station to build a dozen houses.</p> <p>The meeting planned for Jan 2012 to determine the form of development never happened and in May 2012, TRDC presented a land use plan and an area plan setting out what TRDC wanted. TRDC reverted to consultation and not a lot of that in any real sense. TRDC failed to mention that to accommodate the proposed density of development, all car parking would have to be underground or enclosed.</p> <p>By September 2012, residents were resigned to comment TRDC will do what they want whatever we say and interest evaporated. At consultation in September 2012 only 134 comment forms were returned.</p> <p>At no stage over a period of two years has TRDC mentioned the Localism Act at any local presentation or meeting.</p> <p>I do not believe TRDC has the support of local residents.</p> <p>TRDC has not undertaken a full review of the Green Belt. I'm opposed to this but it is happening and</p>	<p>No change requested.</p>	<p>The Core Strategy (adopted October 2011) has identified the regeneration of the South Oxhey area to reduce inequalities across the District.</p> <p>The 'South Oxhey Initiative' project has been subject to consultation and will continue to be in the future.</p> <p>The detailed impact of development on the area would be assessed through the planning application process.</p>	<p>No change considered necessary.</p>

SCHEDULE OF REPRESENTATIONS

TRDC have got to get on top of it. Failing to undertake a review of the Green Belt has led to the most awful bad planning in relation to South Oxhey.

The density of the proposed scheme is excessive, 57 units per acre. 1000 underground parking spaces, estate roads of 5m width, a school 100 yards away, a railway bridge that has not been reinforced for 50 years, insufficient school provision. TRDC have been given targets for new residential units and the South Oxhey plans are designed to accommodate those targets. There is failure to grasp the totality of changes coming into play and apply them in a way that maintains an acceptable standard of built environment. Proposals for South Oxhey totally counter to why the estate was built to start with. If we have to surrender some areas of green belt to sustainable development, lets do it and not inflict the double whammy of inner city density and loss of green belt. If sustainable development is the way of the future, it will have to be planned. It will require compromise, imagination, competence, a measured and planned response.

I am seriously concerned that the type of development proposed is what on a larger scale put Ireland and Spain into a state of near bankruptcy. If a developer goes into administration half way through the project it will be cold comfort that TRDC adhered to any financial guidelines.

Retailing generally is in the doldrums and it is unlikely to see a resurgence. Neighbouring retail centres include Watford, Pinner and Hatch End. Existing local shops at South Oxhey are not well supported by residents. If quality individual retailers cant survive in Watford, Hatch End and Pinner they will not locate or survive in South Oxhey.

Local residents would have liked to see existing shops refurbished. TRDC have given no financial details to support statements that refurbishment is uneconomic. You cant build 400 additional residential units if you refurbish. It is financial suicide to build new retail units and let them to charity and pound shops.

Originally, TRDC were going to find partners to undertake development. Now TRDC saying they will retain freehold. A developer will budget for between 25-50% of gross development value as profit. Currently nearer 50% than 25%. Unlikely that they will offer anything like that to the Council as a premium for grant of the building lease. For residential units this could be a give away of £15-30 million. TRDC will have to take a lease back on commercial content which is speculative, obsolete and difficult to let.

60167 CPRE SA6
/3004 Hertfordshire
2/SA6
/2

The South Oxhey Area Plan does not include a defined Green Belt boundary. This renders the plan unsound.

The South Oxhey Area Plan should include a defined Green Belt boundary.

It is not considered appropriate to show the Green Belt boundary on the Area Plan however Green Belt boundaries are clearly indicated on the Policies Map. No change considered necessary.

Land Use Plan

10.0 Langleybury and The Grove

6017 English Heritage 10
0/300
44/10
/4

Section 10 Langleybury and The Grove, policy SA7 and explanatory text Section 4 Policy SA1 Site H(10) Langleybury House

Langleybury House, is a Grade II* listed building at risk which appears on the national Heritage at Risk Register published by English Heritage. There is a clear opportunity here to achieve the repair and re-use of Langleybury House, the setting of which has been degraded by the adjoining, dominant and poorly designed modern school building. Demolition of the modern building, and provision for its replacement within the curtilage of The Grove, could enable a mutually beneficial result to be achieved. We believe that the 'trading' of development on Green Belt land in this way is justified by the exceptional circumstances pertaining to the highly graded historic building at risk. In addition, such relocation is consistent with the aims and purposes of Green Belt set out in PPG2, in terms of enhancing the openness of the Green Belt in a sensitive position and re-placing such development where this purpose is not infringed to the same degree.

We are concerned, however, that the proposal includes a reference to 20 dwellings being permitted within the Langleybury site. We understand that the owners of The Grove Hotel and conference facility have plans for new development to allow expansion of that business. In our view, this should be all the replacement development required to ensure that the future of the historic building at risk is secured. Any additional new development at Langleybury would require clear justification if it is not to undermine the case for release of Green Belt land at the Grove, contrary to advice in Chapter 9 of the National Planning Policy Framework (NPPF).

We consider the Site Allocations Plan unsound in its proposed allocations under Policy SA1 (H12) and SA7 due to conflict with national policy in the NPPF, in particular with the policy advice in paragraphs 126 and 131. The developments taken as a whole for Langleybury and the Grove would not, in our view, comply with the approach to sustainable development set out in paragraph 7 of the NPPF, and the advice in paragraph 8.

We recommend that policy SA1 (H12) should not make provision for 20 houses at Langleybury. The plan should seek to secure the repair and future use of Langleybury House listed building by means of demolition of the nearby modern, unsightly school building at Langleybury and provision of equivalent development, sensitively located, at The Grove.

The need for housing within the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt. It is proposed to remove the old school buildings and refurbish, extend and convert Langleybury House. Residential and hotel/leisure development would be sited in the least sensitive locations of the site. However the detailed impact of development on the area would be assessed through the planning application process. No change considered necessary.

SCHEDULE OF REPRESENTATIONS

Policy SA7: Langleybury and The Grove

6010 2/300 24/S A7/C	Hertfordshire Biological Records Centre	SA7	<p>We confirm that the Langleybury Development Brief Area lies adjacent to the Grand Union Canal CWS (refs: 83/045 & 75/006). We have information to suggest that the area proposed for 'potential wet woodland area' is already wet woodland, although there may be more opportunities to create more wet woodland along the western bank of the canal. We welcome the appropriate management of the woodland management area. We support the approach to developing a local organic farm (incorporating a livestock enterprise) as this will have a number of wider ecological, environmental and educational benefits within this site and potentially beyond. We know that the site at Langleybury School supports an icehouse that may have potential to support bats.</p> <p>We confirm that the Grove Development Brief Area contains two CWSs: Heath Wood, The Grove (ref: 83/015/01) and Air Raid Shelter, The Grove (ref: 83/015/02). Heath Wood is an ancient semi-natural open mixed broadleaved woodland with some 18th Century plantain. We welcome the appropriate management of this woodland. The location of the Air Raid Shelter is not identified on any of the plans within the June 2012 Development Brief. We would request that the precise locations of the Air Raid Shelters are identified on any constraints and or development concept plans. We have concerns that the end of the air raid shelter complex lies very close and or within the area identified for the 'New Accommodation / Conference Wing'. This CWS is an important site for a number of hibernating bat species and it is important that any development does not alter or modify the local habitat characteristics in this area (particularly around the entrance) as part of any development proposals.</p> <ul style="list-style-type: none"> · An area of grassland that lies between the M25 and Heath Wood was translocated as part of the original Grove development. This grassland is of at least local ecological value and also enhances the ecological value of Heath Wood. HBRC would request that development proposals include the appropriate management of this area to enhance and retain the ecological interest of this grassland. · Historic maps indicate both Langleybury and The Grove have orchards associates with the estates. Consideration should be given to re-creating these features. Orchards are an ideal contribution towards objective of enhancing features which have a visual role in the character of the site and the surrounding landscape. · HBRC hold records of protected species at the The Grove including an important bat roost. These issues will need to be dealt with for both The Grove and Langleybury Estates as part of any application. HBRC would be happy to provide pre-application advice on this. 	No change required.	Comment noted. The detailed impact of future development would be assessed through the planning application process.	No change required.
6012 6/300 36/S A7/S	Ralph Trustees Ltd	SA7	<p>RTL continues to fully support Policy SA7 for the reasons provided in the explanatory justification (paras 10.1-10.10) and the additional guidance provided in the Development Brief.</p>	No change required.	Comment noted.	No change required.
6016 8/300 42/S A7/2	CPRE Hertfordshire	SA7	<p>This policy proposes Hotel and Leisure development on The Grove and Hotel and Leisure together with Housing on Langleybury.</p> <p>The policy is very poorly worded. The preceding paragraphs explain the intention for the sites but the policy itself needs to be tightened and must refer specifically to development appropriate to the Green Belt.</p> <p>Paragraph 10.8 states in relation to Langleybury, that new hotel/leisure development is proposed. We object in principle to the implication that this new development will not be restricted to Previously Developed Land. Any development on the site should be restricted to the previously developed parts of the site.</p> <p>Paragraph 10.9 states that a new conference facility is proposed at The Grove. This implies that additional development is being proposed in the Green Belt on land not previously developed. We object in principle to additional development at The Grove which is not appropriate in the Green Belt.</p>	Policy SA7 should be amended to include only development that is appropriate in the Green Belt.	Further information and guidance on the Langleybury and The Grove development is set out in the Development Brief. Development in the Green Belt may be justified where very special circumstances are demonstrated.	No change considered necessary.
					Paragraph 3.4 sets out that 'all development will be assessed in accordance with planning policy in the NPPF, the Core Strategy and Development Management Policies Documents and any subsequent local plan documents. It is not necessary to repeat the detail of these policies in the site allocations document.	

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6017 1/300 44/S A7/4	English Heritage	SA7	<p>Section 10 Langleybury and The Grove, policy SA7 and explanatory text Section 4 Policy SA1 Site H(10) Langleybury House</p> <p>Langleybury House, is a Grade II* listed building at risk which appears on the national Heritage at Risk Register published by English Heritage. There is a clear opportunity here to achieve the repair and re-use of Langleybury House, the setting of which has been degraded by the adjoining, dominant and poorly designed modern school building. Demolition of the modern building, and provision for its replacement within the curtilage of The Grove, could enable a mutually beneficial result to be achieved. We believe that the 'trading' of development on Green Belt land in this way is justified by the exceptional circumstances pertaining to the highly graded historic building at risk. In addition, such relocation is consistent with the aims and purposes of Green Belt set out in PPG2, in terms of enhancing the openness of the Green Belt in a sensitive position and re-placing such development where this purpose is not infringed to the same degree.</p> <p>We are concerned, however, that the proposal includes a reference to 20 dwellings being permitted within the Langleybury site. We understand that the owners of The Grove Hotel and conference facility have plans for new development to allow expansion of that business. In our view, this should be all the replacement development required to ensure that the future of the historic building at risk is secured. Any additional new development at Langleybury would require clear justification if it is not to undermine the case for release of Green Belt land at the Grove, contrary to advice in Chapter 9 of the National Planning Policy Framework (NPPF).</p> <p>We consider the Site Allocations Plan unsound in its proposed allocations under Policy SA1 (H12) and SA7 due to conflict with national policy in the NPPF, in particular with the policy advice in paragraphs 126 and 131. The developments taken as a whole for Langleybury and the Grove would not, in our view, comply with the approach to sustainable development set out in paragraph 7 of the NPPF, and the advice in paragraph 8.</p>	<p>We recommend that Section 10 and policy SA7 should not make provision for 20 houses at Langleybury. The plan should seek to secure the repair and future use of Langleybury House listed building by means of demolition of the nearby modern, unsightly school building at Langleybury and provision of equivalent development, sensitively located, at The Grove.</p>	<p>The need for housing within the District and the absence of alternative deliverable non-Green Belt sites may constitute very special circumstances which would be required for development to take place in the Green Belt. It is proposed to remove the old school buildings and refurbish, extend and convert Langleybury House. Residential and hotel/leisure development would be sited in the least sensitive locations of the site. However the detailed impact of development on the area would be assessed through the planning application process.</p>	<p>No change considered necessary.</p>
6017 6/300 45/S A7/2	HCC Minerals and Waste	SA7	<p>The county council has previously provided comments on the draft development brief in February 2012.</p> <p>It should also be noted that part of the western boundary of the development brief's plan area for The Grove adjoins Great Westwood Quarry. Although policies in the county council's adopted Waste Core Strategy and Development Management Policies document, do not prescribe a distance where incompatible development proposals will not be supported by the county council, planning permission was granted in February 2012 to increase the time period to complete infilling and restoration at Great Westwood Quarry by a further three years until 11 April 2014. Although sand and gravel extraction has now ceased, the site will continue to be safeguarded by the county council until expiry of the aforementioned planning permission in 2014.</p>	<p>No change required.</p>	<p>Comment noted.</p>	<p>No change required.</p>
11.0 Green Belt						
60006 /3000 5/11/S	Hertsmere BC	11	<p>We support the overall approach to the Green Belt.</p>	<p>n/a</p>	<p>Support welcomed.</p>	<p>No change required.</p>
60149 /3004 0/11.4 /2	Maplecross Properties	11.4	<p>The proposed wording as it stands in the proposed document is: 'While no changes to the Green Belt are proposed at Maple Cross (Froghall Farm/ Maple Lodge), a planning brief will be prepared by the Council in consultation with relevant stakeholders and those with a land interest to ensure the long term and sustainable planning of the area.'</p> <p>This does not appear to allow for any sort of Green Belt review resulting from the adoption of a Planning Brief. That is a change from the stance of the current saved Local Plan Policy GB4, which stated that the area would remain in the Green Belt until formal amendment was made arising from the adoption of a Development Brief. Retaining the site in the Green Belt whilst enabling some form of development through the Planning Brief would be unduly constraining on these uses.</p>	<p>No change required.</p>	<p>Due to its sensitive location the Council did not consider amending the Green Belt boundary at Maple Cross necessary or appropriate. Retaining Green Belt designation provides control over future development of this significant site.</p>	<p>No change required.</p>

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60255 Hertfordshire /3005 County Council 7/11/1	11	<p>Section 11 of the SADPD deals with Green Belt policy. HCC has noted that limited changes are proposed to the Green Belt boundary, however we would wish to reaffirm our previous representations that appropriate allocations and policies in respect of education sites would assist the County Council and individual schools to adjust the provision of school places in the district without the need to provide onerous 'very special circumstances' cases in each instance.</p> <p>6.2 Section 9 of the NPPF deals with Green Belt policy and states at paragraph 87; 'As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances' The SADPD by allocating sites for schools but failing to consider the green belt boundary promotes confusion as to whether education development in the green belt is to be considered 'appropriate development', when clearly this matter has been considered and accepted already, in principle.</p> <p>6.3 The Planning Inspectors Report to TRDC on the Core Strategy in relation to the overall approach to the Green Belt indicated that :-</p> <p>1. The Spatial Strategy proposes that Green Belt sites and phasing of development will be identified through the Site Allocations Development Plan Document (SADPD). This is reflected in CS paragraph 5.107, which states that detailed changes to the established Green Belt boundary will be made through the SADPD. However Policy CP11, whilst confirming the objective of maintaining the general extent of the Metropolitan Green Belt in Three Rivers, does not provide a coherent mechanism for the revision of its boundary. The Council has suggested change A11 to rectify this and clarify that any revisions to the boundary of the Green Belt will be identified through the SADPD. This change should be made to ensure that the CS sets out clearly the method and timetable for reviewing the Green Belt boundary.</p> <p>2. Paragraph 5.107 of the CS anticipates that no more than 1% of the area designated as Green Belt will be lost as a result of this exercise and Policy CP11 describes boundary revisions as minor. This assessment flows from information in the Strategic Housing Land Availability Assessment (SHLAA) and preliminary work on the SADPD. The Council has confirmed that it remains an accurate assessment of the likely scale of change and that it takes account of all development needs, including the potential allocation of a site for a secondary school in the Green Belt. TRDC's Changes identified during the Examination of the Submitted Core Strategy, in particular Change A11, stated that TRDC would "where appropriate, make minor amendments through the SADPD to the detailed Green Belt boundaries around the urban area to accommodate development needs as detailed in the spatial strategy and place shaping policies". HCC is disappointed that the SADPD does not use the opportunity to plan effectively for the future in the sense that none of the school sites (neither new allocations nor existing school sites) have been considered for removal from the Green Belt.</p> <p>6.4 HCC submitted comments to the Development Management Policies DPD January 2012, consultation in a letter dated 29 February 2012, suggesting an approach in relation to education sites to allow for expansion, however it appears that such comments have not been considered by the Council. An approach to identify existing school sites on the periphery of settlements where it would not be harmful to adjust the boundary to exclude the built area of the school, whilst retaining playing fields in the Green Belt, would effectively enable schools to expand within a limited area. Given the well evidenced justification made in respect of future education need, this is seen as a sensible approach and one of sound planning merit.</p>	Removal of school sites from the Green Belt.	It is not considered appropriate to amend the Green Belt boundaries of identified school sites because they are sited in sensitive locations, where retaining Green Belt designation would provide control over future development of the sites.	No change considered necessary.
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Site GB(1)

60031/ Warner 30015/ Brothers GB1/LC Studios Leavesden	GB1	<p>Warner Bros Studios Leavesden (WBSL) has submitted detailed representations to all earlier Site Allocations DPD consultations. These comments, particularly those submitted at the pre-submission stage, and pre-submission additional sites stage remain valid and have not been repeated within this statement. A copy of these representations has been appended to this submission and provides the detailed justification and evidence base to support WBSL's position. In summary,</p> <p>(a) WBSL welcomes the Council's further review of green belt boundaries at Leavesden and support the removal of the Studios from the green belt.</p> <p>(b) However, the Council's proposed amendment to the green belt boundary at GB(1) does not go far enough. WBSL therefore maintains its objection to the proposed revision, as it continues to fail to accord with the recently adopted core strategy, particularly policies PSP2 and CP11, in that it fails to make the necessary revisions to the green belt boundary in order to ensure that the future development needs of this nationally important employment site are not compromised. The result of the Council's proposed amendment is that the draft policy is not considered to be sound and is not justified, as it fails to remove all of the developed area of the Studios and the Island Site (future expansion land) from the green belt.</p> <p>The importance of the Studios site (Leavesden Aerodrome site) in meeting the employment and housing needs of the district through a comprehensive mixed-use redevelopment remains key to the successful delivery of core strategy objectives.</p>	<p>The Site Allocations DPD should be amended to reflect the continuing importance of the Studios to the national and regional economy, both as a local employer and as a centre intended to contribute to the economic growth of the District for the plan period, as set out in core strategy policies PSP2, CP11 and paragraph 5.106.</p> <p>In order to satisfactorily do this, the green belt should be revised as shown on the enclosed (previously submitted) plan: WBSL revised green belt Plan A 193301G/12/GB/011</p> <p>We also refer to our previously submitted plans showing the Council's proposed amended green belt boundary superimposed on a site layout plan, which clearly highlights anomalies with the Council's approach. An aerial photograph dated July 2012 supports this position.</p>	It is not considered appropriate to amend the Green Belt boundary because the Leavesden site is a sensitive location and retaining Green Belt designation on the rest of the Leavesden site provides control over future development of this significant site.	No change considered necessary.
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SCHEDULE OF REPRESENTATIONS

60035/ 30019/ GB1/2	Watford Borough Council	GB1	<p>Having reviewed the proposals for the area of Green Belt at Leavesden, and taking into consideration the built up nature of the surrounding studios, and proposed housing site with outline planning permission, WBC find that it is appropriate to remove the green belt designation and therefore we withdraw our original objection to the loss of Green Belt.</p> <p>However, a strategy for the wider Leavesden area would be an important item to discuss through our future Duty to Cooperate meetings. WBC recognise the strategic importance of the studios and the planned residential development but would like to ensure that future decisions on whether to retain other sections of Green Belt involve WBC.</p>	No change required.	Support welcomed. We will continue to work with Watford Borough Council on strategic issues.	No change required.
60157/ 30042/ GB1/2	CPRE Hertfordshire	GB1	<p>The proposed change to the Green Belt boundary would create an isolated area of longstanding open Green Belt land that would perform no Green Belt purpose and be vulnerable to development. This situation would arise as a direct result of the proposal by the Council to remove a belt of land between the Leavesden Studios buildings and Aerodrome Way from the Green Belt as shown on page 71 of the LDD. The removal of this belt of open land from the Green Belt is not consistent with the stated 'Reason for Change' that states 'only the studio buildings and immediately surrounding areas of hardstanding (our emphasis) are proposed to be removed from the Green Belt.'</p> <p>The area of Green Belt land that would isolated from the Green Belt was previously contiguous with Green Belt to the north on which the Council has now granted planning permission for development, and which itself no longer performs a Green Belt purpose, and which should therefore be removed from the Green Belt, as stated in previous representations by CPRE Hertfordshire.</p> <p>The Council's proposed change conflicts with Green Belt policy in the NPPF and the Council's Core Strategy, and would result in the further erosion of permanent Green Belt in the absence of any development plan policy to protect this land from development, and is therefore unsound.</p>	The Belt of land between the Leavesden Studios buildings and Aerodrome Way should not be removed from the Green Belt.	The Green Belt boundary at Leavesden has been amended to recognise development that has previously taken place in the Green Belt at Leavesden. The area does not contribute to Green Belt objectives and therefore it is considered appropriate to remove this area from the Green Belt. However to maintain control over future development over the rest of the site it is not considered appropriate to remove Green Belt designation at this time.	No change considered necessary.
Policy SA8: Maple Lodge Wastewater Treatment Works						
60177/ 30045/ SA8/2	HCC and Waste	Minerals SA8	<p>Maple Lodge sewage treatment works, which has been identified in the proposed submission document as a significant infrastructure site in the Green Belt, continues to be safeguarded by the county council for its current waste use as a sewage treatment works. It is listed as a safeguarded site in the most recent Minerals and Waste Authority's Monitoring Report. The aims of Policy SA8 and the identification of it as a significant infrastructure site in the Green Belt, are therefore supported, as they do not contradict Waste Policy 5: Safeguarding of Sites in the adopted Waste Core Strategy and Development Management Policies document.</p>	No change required.	Support welcomed.	No change required.

12.0 Monitoring and Delivery

Policy SA9: Monitoring and Delivery

Appendix 2

SCHEDULE OF REPRESENTATIONS

60107/ Gade App2
30026/ Investments Ltd
App2/2

Map shows the site allocated for housing and mixed use as part of green belt and wildlife interest. Dealing with these:

It is not appropriate to retain the land which is shown allocated for development as Greenbelt. It would otherwise undermine the strength and purpose of Greenbelt policy. The land no longer fulfils a greenbelt function and should be excluded on this basis in any event. The land is well screened and well contained and relates much more to the band of existing development along the road.

Furthermore the wildlife interest designation is inappropriate to the site and out of date because the land has been the subject of the physical ground works which have completely cleared the site and is made up of clean rubble with a clean cover of topsoil and grass seed which has returned a grass surface but this is kept very low and has no nature conservation interest.

Delete site from GB and remove wildlife interest designation (using the lake as the boundary as a suggestion) and retain the allocation for housing development.

Paragraph 11.2 and 11.3 sets out that the Green Belt designation on allocated sites will be reviewed once development has been completed as many proposed development sites are in sensitive locations and retaining Green Belt status would enable the Council to maintain greater control over future development on these sites.

County Wildlife Sites are designated by Hertfordshire County Council and it is not considered appropriate to remove reference to an existing wildlife sites. The detailed impact of future development would be assessed against relevant policies of the Local Plan.

No change considered necessary.