

Three Rivers District Council

Local Plan

Site Allocations LDD

Statement of Representations

June 2013



Contents

	Page
1.0 Introduction	1
2.0 Representations Overview	1
3.0 Number of Representations Received	2
4.0 Main Issues Raised	2
4.1 Housing Site Allocations	2
4.2 Employment Site Allocations	11
4.3 Education Allocations	12
4.4 Retail Allocations	12
4.5 Open Space Allocations	13
4.6 South Oxhey	15
4.7 Langleybury and the Grove	15
4.8 Maple Lodge Wastewater Treatment Works	15
4.9 Green Belt	16

1.0 Introduction

- 1.1 This statement has been published in support of the Site Allocations Proposed Submission Document (November 2012) in line with the Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. It sets out how representations were made pursuant to Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the number of representations made and a summary of the main issues raised in those representations.

2.0 Representations Overview

- 2.1 Following approval of the Site Allocations Proposed Submission document in October 2012 by Full Council, the Site Allocations Proposed Submission Document was published for public consultation for a period of 6 weeks between Friday 9 November 2012 and Friday 21 December 2012 in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Local Development Scheme.
- 2.2 Representations were invited from the list of consultees detailed in Appendix 1 of the Consultation Statement. Representations were also invited from additional organisations and individuals who had requested to be added and kept informed on the Council's Local Plan consultation database. Respondents were able to submit representations using the prescribed form and comments could be made either in writing or by way of electronic communications.
- 2.3 A total of 276 representations were received from 63 separate individuals and organisations. Of the representations received, 14 were in support, 77 were objecting, 180 were commenting or requesting minor changes on the Site Allocations LDD and 5 had no comment to make.
- 2.4 The key areas of objection can be summarised as follows:
- Sites allocated for schools and housing should not be in the Green Belt or in areas that are subject to planning constraints such as being located in a flood zone or a wildlife site.
 - Loss of the only hotel in Rickmansworth.
 - Lack of the allocation of a primary school in the district.
 - Green Belt boundary changes at Leavesden- the proposed loss of Green Belt/ the need to make further boundary amendments.
- 2.5 A full table setting out the number of duly made representations for each policy can be found in the Schedule of Changes to Proposed Submission document (SACD6). None of the responses received on the Site Allocations LDD Proposed Submission are considered to have raised fundamental legal compliance or soundness issues for the Site Allocations LDD.

3.0 Number of Representations Received

3.1 The number of representations for each policy is set out below:

❖ SA1 Housing	173 representations
❖ SA2 Employment	19 representations
❖ SA3 Education	32 representations
❖ SA4 Retail	1 representation
❖ SA5 Open Space	15 representations
❖ SA6 South Oxhey	5 representations
❖ SA7 Langleybury and the Grove	6 representations
❖ SA8 Maple Lodge Wastewater Treatment Works	1 representation
❖ SA9 Monitoring and Delivery	0 representations
❖ Green Belt	6 representations
Total-	258 representations

The remaining representations relate to other sections of the Site Allocations LDD such as 'Presumption in Favour of Sustainable Development' and 'Appendix 2'.

4.0 Main Issues Raised

4.1 Policy SA1: Housing Allocations

H(1) Adjacent 65 Toms Lane, Kings Langley 4 representations

Issue(s) raised:

- Need to take into account the cumulative and cross boundary impact on the infrastructure of Kings Langley Village.
- Clarification on the suitability of the proposed conversion of employment land to housing within Kings Langley.
- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.

H(2) Land at Three Acres, Toms Lane, Kings Langley 5 representations

Issue(s) raised:

- Need to take into account the cumulative and cross boundary impact on the infrastructure of Kings Langley Village.
- Clarification on the suitability of the proposed conversion of employment land to housing within Kings Langley.
- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.
- Inappropriate to accommodate 20 properties on the site due to access and traffic issues.
- The traditional orchard (a priority habitat) should be retained or compensation provided on site or elsewhere.

H(3) Kings Langley Employment Area

8 representations

Issue(s) raised:

- Need to take into account the cumulative and cross boundary impact on the infrastructure of Kings Langley Village.
- Clarification on the suitability of the proposed conversion of employment land to housing within Kings Langley.
- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.
- Not an appropriate site for mixed use development due to potential security breaches.
- No realistic prospect for mixed use development due to the existing and long established office use on site and plans for redevelopment.
- Dwelling capacity should be increased by 30 to 180 to ensure that the Council's housing requirement is met.
- Any development proposals should not prevent or prejudice the continual use of HCC's safeguarded waste facility at Railway Terrace.
- The sewerage network capacity is unlikely to support the demand anticipated from the development.
- The comments box needs to be amended to confirm that the site does not lie within a flood zone.
- Further explanation of the 8m buffer is required.
- A number of waste sites in the northern part of the allocation exist- need to be aware of these sites when considering the sensitivity of receptors as part of any new development.
- Site reference to north of Masters Yard should not be designated as a wildlife site because there is no ecological interest following site clearance and reinstatement of the land.

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

4 representations

Issue(s) raised:

- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.
- Site considered a Greenfield site and not PDL because agricultural buildings are not included within the NPPF definition of previously developed land.
- Site unsuitable due to its existing use and physical and capacity constraints- Green Belt, 250 m south of the M25.
- High density development proposed which would be out of character with the area.
- Contradicts policies within the Core Strategy and the requirements of the NPPF.
- Deliverability and potential to meet the housing need of the Council is questioned.

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

2 representations

Issue(s) raised:

- None.

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

4 representations

Issue(s) raised:

- Allocation should be limited to the area of PDL occupied by the pumping station.
- Conflicts with the Core Strategy and the NPPF.

- Final score should be ranked lower.
- Site constraints- i.e. poor access to services and facilities, contamination, mature trees, important wildlife sites.
- No justification for proposing to allocate the site.
- Not the most appropriate strategy when considered against the reasonable alternatives.

H(7) Furtherfield Depot, Furtherfield, Abbots Langley

5 representations

Issue(s) raised:

- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.
- Not as sustainable compared to a previously excluded site (Woodside Road).
- Proposed dwelling capacity would be out of character with the area given the sites location, extending into the Green Belt and being surrounded on three sides by open land.
- Conflicts with the Core Strategy and the NPPF.
- Site constraints- i.e. possible contamination, poorly related to existing development in the area, Green Belt.

H(8) Leavesden Aerodrome, Abbots Langley

3 representations

Issue(s) raised:

- The sewerage network capacity is unlikely to support the demand anticipated from the development.
- 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.
- It is poorly related to existing development in the area.
- Not particularly accessible to other services or facilities.
- Not considered appropriate for housing 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.

H(9) Hill Farm Industrial Estate, Hill Farm Avenue, Leavesden

4 representations

Issue(s) raised:

- The sewerage network capacity is unlikely to support the demand anticipated from the development.
- Final score should be ranked lower.
- 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.

H(10) Langleybury House/School, Langleybury

3 representations

Issue(s) raised:

- None.

H(11) Royal British Legion, Church Lane, Sarratt

4 representations

Issue(s) raised:

- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.
- Proposed dwelling capacity would be out of character with the area given the sites location adjacent to a Conservation Area and the density of the adjacent dwellings extending into the Green Belt and being surrounded on three sides by open land.
- The site is recorded as containing an ice house that may have potential to support bats.
- 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.
- Conflicts with the Core Strategy and the NPPF.

H(12) 33 Baldwins Lane, Croxley Green

4 representations

Issue(s) raised:

- Fragmented approach to providing housing land supply in Croxley Green i.e. small sites of 5-30 houses- alternative approach and site suggested.

H(13) Killingdown Farm Buildings, Croxley Green

7 representations

Issue(s) raised:

- Fragmented approach to providing housing land supply in Croxley Green i.e. small sites of 5-30 houses- alternative approach and site suggested.
- Low site score- other sites put forward but not proposed for allocation had a higher score and were more sustainable.
- Site considered Greenfield and not PDL because agricultural buildings are not included within the NPPF definition of previously developed land.
- Not justified or sound.
- Site constraints- i.e. possible contamination, little opportunity to integrate development into the surrounding landscape, Conservation Area, Green Belt.
- Conflicts with the Core Strategy and the NPPF.
- The sewerage network capacity is unlikely to support the demand anticipated from the development.

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

4 representations

Issue(s) raised:

- Fragmented approach to providing housing land supply in Croxley Green i.e. small sites of 5-30 houses- alternative approach and site suggested.

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

3 representations

Issue(s) raised:

- Fragmented approach to providing housing land supply in Croxley Green i.e. small sites of 5-30 houses- alternative approach and site suggested.

H(16) Croxley Station Car Park and Timber Yard 5 representations

Issue(s) raised:

- Fragmented approach to providing housing land supply in Croxley Green i.e. small sites of 5-30 houses- alternative approach and site suggested.
- Involvement of Thrive Homes in taking forward any affordable housing on the site.

H(17) Branksome Lodge, Loudwater Lane, Loudwater 3 representations

Issue(s) raised:

- Sustainable location and would result in the logical rounding off of the settlement.
- Traffic and access issues.

H(18) Land Rear of The Queens Drive, Mill End 3 representations

Issue(s) raised:

- The sewerage network capacity is unlikely to support the demand anticipated from the development.

H(19) Garages Rear of Drillyard, West Way, Rickmansworth 5 representations

Issue(s) raised:

- Looking at possible uses around the site to benefit the wider community.

H(20) Long Island Exchange, Victoria Close, Rickmansworth 5 representations

Issue(s) raised:

- Loss of the only hotel in Rickmansworth.
- Traffic and access issues.
- Impact on residential amenity.
- Not sound.
- Hotel is a building of heritage and a local landmark.
- Located in a sustainable location.
- Suggested housing densities will be used as a baseline on which to base bids for higher densities.

H(21) Police Station, Rectory Road, Rickmansworth 2 representations

Issue(s) raised:

- None.

H(22) Royal British Legion, Ebury Road, Rickmansworth 2 representations

Issue(s) raised:

- None.

H(23) Langwood House, High Street, Rickmansworth

6 representations

Issue(s) raised:

- The sewerage network capacity is unlikely to support the demand anticipated from the development.
- Further explanation of the 8m buffer required.

H(24) Gas Works, Salters Close, Rickmansworth

3 representations

Issue(s) raised:

- The sewerage network capacity is unlikely to support the demand anticipated from the development.
- 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.
- Unsure whether the site allocation will be developable as one piece of land given that a proportion of the site has been unallocated to take it out of flood zone 3 to allow residential development.

H(25) Bridge Motors, Church Street, Rickmansworth

4 representations

Issue(s) raised:

- Unsure whether the site allocation will be developable as one piece of land given that a proportion of the site has been unallocated to take it out of flood zone 3 to allow residential development.
- Further explanation of the 5m buffer zone is required.
- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.

H(26) Depot, Harefield Road, Rickmansworth

3 representations

Issue(s) raised:

- Further explanation of the 8m buffer required.

H(27) Depot, Stockers Farm Road, Rickmansworth

4 representations

Issue(s) raised:

- Objection to a loss of a section of water meadow unless it can be demonstrated that this area supports no ecological interest in the context of the wildlife site.
- Amend the comments section because the boundary does include part of the wildlife site.
- The site is on 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.

H(28) Land South of Tolpits Lane

8 representations

Issue(s) raised:

- Request to remove Little Tolpits Cottage from the allocation.
- Site constraints- Green Belt, flood risk area, site of archaeological interest, tree preservation orders, wildlife sites.
- Utilising existing empty buildings and previously disused land should be the priority for locating new buildings.
- Traffic, access and safety issues- no street lighting, public transport or pavements along Tolpits Lane.
- Objection to development on this site unless it can be demonstrated that the area supports no ecological interest.
- Document is sound and legally compliant.
- Identification of H(28) is justified as part of the overall review of housing sites undertaken.
- Available and deliverable residential site which could be brought forward within the plan period- site is currently vacant, single ownership, existing access to Tolpits Lane, no contamination issues.
- Although located within a wildlife site the provision of sufficient mitigation and provision of enhanced habitats within a scheme would avoid adverse impact.
- Following a SFRA there are no in principle flood risk issues related to the development of 50 units.
- Conflicts with Green Belt policy within the NPPF in terms of the definition of PDL.
- The housing allocation should be limited to the area of PDL and the land along the River Colne should be left open.
- Further explanation of the 8m buffer is required.
- Recommends that any development is sensitive to its surroundings and does not have a detrimental impact upon the local biodiversity.
- Low housing site score.
- Isolated site which is not easily accessible to other services or facilities.
- Conflicts with the Core Strategy and the NPPF.
- 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.
- Not justified and unsound.

H(29) Pocklington House, Eastbury

3 representations

Issue(s) raised:

- Following reappraisal of the site the phasing period can come forward from 2016-2020 to 2012-2015.

H(30) The Fairway, Green Lane, Oxhey Hall

4 representations

Issue(s) raised:

- Contradicts the Development Management Policies Local Development Document.
- Housing density should not exceed 25- 30 dwellings per hectare/ 10- 12 per acre.
- Residential use (C3) is considered to be a suitable alternative.

H(31) Crescent Club, Hallows Crescent, South Oxhey

4 representations

Issue(s) raised:

- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.
- Contradicts the Development Management Policies Local Development Document.

H(32) Former Jet Public House, Hayling Road, South Oxhey

3 representations

Issue(s) raised:

- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.

H(33) Little Furze School, South Oxhey

6 representations

Issue(s) raised:

- Potential issues may occur with an increase in disturbance on the woodland by the development of 100 dwellings.
- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.
- The sewerage network capacity is unlikely to support the demand anticipated from the development.
- School closed as there was a surplus to requirements. Site now identified by HCC as an elderly persons/ care home.
- The demand for school places is likely to increase in South Oxhey but there are opportunities to expand nearby primary schools.
- Development will have a significant impact on the Green Belt, local nature reserve and wildlife site.

**H(34) Amenity Space Maylands Road/
Ferndown Road, South Oxhey**

3 representations

Issue(s) raised:

- The sewerage network capacity is unlikely to support the demand anticipated from the development.
- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.
- Thrive Homes are relocating play equipment to the Moortown Road site as part of the purchase of land in Otley Way.

H(35) South Oxhey Town Centre

5 representations

Issue(s) raised:

- Support for the redevelopment of South Oxhey town centre.
- In accordance with the Core Strategy in terms of its aim of focusing housing provision within the existing urban area and more specifically within Key Centres.
- Suggested changes are made to the land use and area plan.
- The sewerage network capacity is unlikely to support the demand anticipated from the development.
- No justification as to how a dwelling capacity of 280 dwellings has been revised from 210.

- Unsound because it fails to evidence the likely delivery from the regeneration area.
- In danger of not meeting the housing requirements of the Core Strategy due to the lack of clear, justified evidence of capacity and any sites that did come forward could not be relied upon to provide affordable housing.

H(36) Grapevine Public House, Prestwick Road, South Oxhey

4 representations

Issue(s) raised:

- Any residential development of this site would result in the loss of woodland and have an ecological impact that would require compensation.
- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.

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

6 representations

Issue(s) raised:

- Green Belt and not previously developed land.
- Last remaining field of its kind in South Oxhey which is possibly a flood plain.
- Conflicts with Green Belt policy within the NPPF and the Core Strategy.
- 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.

H(38) Rear of Lytham Avenue, South Oxhey

3 representations

Issue(s) raised:

- Involvement of Thrive Homes in taking forward any affordable housing in the scheme.

Policy SA2: Employment Site Allocations

E(a) Croxley Business Park

4 representations

Issue(s) raised:

- Request that the document makes it clear that within mixed use allocations, individual sites can be developed as employment, housing or any combination.
- Amendments to the comments box suggested i.e. 8m buffer zone required.

E(b) Tolpits Lane

4 representations

Issue(s) raised:

- Support for the allocation.
- Strongly support a green corridor as part of redevelopment of the site.

E(c) Carpenders Park West/ Delta Gain

2 representations

Issue(s) raised:

- The river that runs through the site should be de-culverted to create an open, naturalised channel.

E(d) Maple Cross/ Maple Lodge

5 representations

Issue(s) raised:

- Potential for an increase in the size of the identified site through the incorporation of the adjacent redundant site.
- Sound and compliant with National policy.
- The site would no longer contribute to the Green Belt functions and therefore the Green Belt boundary should be reviewed.
- Conflicts with Green Belt policy within the NPPF- unsound.
- The allocation is not shown correctly as the larger area of the site is already allocated for employment and is developed.

E(e) Kings Langley Employment Area

3 representations

Issue(s) raised:

- Not an appropriate site for mixed use development due to potential security breaches.
- No realistic prospect for mixed use development due to the existing and long established office use on site and plans for redevelopment.
- This land is already mixed use and the extended allocation would ensure that redevelopment proposals can be considered in the additional area, including community uses such as places of worship.

4.3

Policy SA3: Education Allocations

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

9 representations

Issue(s) raised:

- Green Belt
- The site is located directly adjacent to the railway line which may lead to unacceptable noise levels within the classroom that will disrupt learning.
- The site is highly visible from the residential area.
- Additional noise generated from the school could impact in the adjoining dwellings and cause significant amenity issues such as loss of privacy, loss of light to gardens and visual impact.

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

14 representations

- Located in the Green Belt
- Traffic issues/ concerns
- Low impact on residents
- The loss or degradation of Biodiversity Action Plan habitats would be strongly opposed.

S(a) Mill End/ Maple Cross- Land east of A405/ north of A412

5 representations

- Located in the Green Belt
- Several issues need to be considered at the planning application stage.
- Any traffic issues could be overcome by amending the location of the existing access.

4.4

Policy SA4: Retail Allocations

R(a) Rickmansworth Town Centre

0 representations

Issue(s) raised: N/A.

R(b) South Oxhey

1 representation

Issue(s) raised:

- Suggested amendments to the Land Use and Area Plan to provide greater clarity and ensure both plans correlate in the uses that they allocate for the site and that greater flexibility is provided to ensure that bank uses will be provided within the redevelopment.

R(c) Abbots Langley

0 representations

Issue(s) raised: N/A.

R(d) Chorleywood

0 representations

Issue(s) raised: N/A.

R(e) Watford Road, Croxley Green

0 representations

Issue(s) raised: N/A.

R(f) Moneyhill Parade, Rickmansworth

0 representations

Issue(s) raised: N/A.

R(g) New Road, Croxley Green

0 representations

Issue(s) raised: N/A.

R(h) Maple Cross

0 representations

Issue(s) raised: N/A.

4.5

Policy SA5: Open Space

**OS(a) The Grove Woodland,
Plaitford Close/ The Byeway, Rickmansworth**

1 representation

Issue(s) raised:

- HBRC would be looking to ensure that any designation and subsequent use does not degrade the ecological value of the woodland.

OS(b) Chorleywood House Estate, Chorleywood

1 representation

Issue(s) raised:

- HBRC would expect any proposals to ensure that the CWS is maintained and managed appropriately.

**OS(c) Land North of South Way
(Horsefield and Furtherfield), Leavesden**

1 representation

Issue(s) raised:

- Use as opens space should not detract from any current ecological interest.

OS(d) Middleton Road, Mill End, Rickmansworth

1 representation

Issue(s) raised:

- None.

**OS(e) South Oxhey Playing Fields,
Rear of 180-202 Hayling Road, 11-15 Frinton Close
and 18-21 Sidmouth Close, South Oxhey** 1 representation

Issue(s) raised:

- None

OS(f) Baldwins Lane Recreation Ground, Croxley Green 1 representation

Issue(s) raised:

- None.

OS(g) Croxleyhall Wood, Croxley Green 1 representation

Issue(s) raised:

- HBRC would be looking for all woodland interest to be retained.

OS(h) Long Valley Wood and Buddleia Walk, Croxley Green 1 representation

Issue(s) raised:

- HBRC would be looking for all existing ecological interest to be retained and not degraded as a result of this allocation.

OS(i) Pheasant's Wood and Solomon's Wood, Chorleywood 1 representation

Issue(s) raised:

- HBRC would be looking for all existing ecological interest to be retained and not degraded as a result of this allocation.

OS(j) Croxley Common Moor, Croxley Green 1 representation

Issue(s) raised:

- 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.

OS(k) South Way Playing Fields, Abbots Langley 1 representation

Issue(s) raised:

- HBRC have no ecological information for the site itself, however it is close to an important site for protected species.

OS(l) The Green, Croxley Green

1 representation

Issue(s) raised:

- 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.

OS(m) Harrocks Wood, Chandlers Cross

1 representation

Issue(s) raised:

- HBRC would be looking for the interest of the CWS to be maintained and not degraded as a result of this allocation.

OS(n) Hill Farm Avenue

1 representation

Issue(s) raised:

- None

4.6

Policy SA6: South Oxhey

5 representations

Issue(s) raised:

- In support of the policy.
- The South Oxhey Area Plan does not include a defined Green Belt boundary which renders the plan unsound.
- Localism Act not explained to local residents at meetings.
- Density of the proposed scheme is excessive.

4.7

Policy SA7 Langleybury and the Grove

6 representations

Issue(s) raised:

- Fully support the policy due to the reasons provided in the explanatory justification.
- Site Allocations Plan unsound due to conflict with the NPPF, in particular paragraphs 126 and 131.
- Object in principle to new development being restricted to previously developed land.
- Assurance that the future of the historic building will be secured.

4.8

Policy SA8: Maple Lodge Wastewater Treatment Works

1 representation

Issue(s) raised:

- Supported because it does not contradict with HCC's waste policy.

Issue(s) raised:

- In support of the removal of the Studios from the Green Belt.
- The policy fails to remove all of the developed area of the Studios and the Island site from the Green Belt and is therefore not sound or justified.
- The proposed Green Belt change conflicts with the NPPF and relevant policies in the Core Strategy.
- Appropriate allocations and policies in respect of education sites would assist HCC and individual schools to adjust the provision of school places in the district without the need to provide onerous 'very special circumstance' causes in each instance.
- Original objection withdrawn as it is considered appropriate to remove the Green Belt designation.
- The proposed boundary change would perform no Green Belt purpose and would be vulnerable to development.