Claire May
Principal Planning Officer (Policy & Projects)
Three Rivers District Council
Three Rivers House
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Dear Claire,

Croxley Green Neighbourhood Development Plan – public consultation on SEA & HRA

Thank you for the two e-mails from Lauren McCullagh, Planning and Conservation Officer at TRDC on 24 July and 30 July conveying the results of the further regulation 16 public consultation and the helpful summary of the responses received by TRDC.

Please will you thank Anne Skippers for her note on the publication of a revised National Planning Policy Framework confirming that it is not her intention to invite or accept any representations or comments on the revised NPPF in relation to her examination of the Croxley Green Neighbourhood Plan (CGNP).

We would like to respond (briefly) to some of the issues raised by those consulted and summarise our views below, for you to pass on to the Independent Examiner.

Canal & River Trust:
No comment.

Historic England:
We are grateful for their confirmation that an SEA is not required and note their recommendation that the conservation and archaeological staff of the relevant local authorities (in this case, Hertfordshire County Council) are closely involved. We have consulted HCC previously.

Natural England:
They advise that a policy on biodiversity and the natural environment should be included in the CGNP. Whilst we have no objection to this suggestion, we consider that it is unnecessary as the current TRDC Local Plan includes clear policies on biodiversity and the
natural environment and the CGNP does not modify them in any way. The TRDC Local Plan is currently under review and any modifications should be prepared as part of that process.

They raise concerns about the management of Croxley Common Moor SSSI for the protection of the slate sober moth. The SSSI is common land, owned by TRDC, and lying within the Green Belt. It is thereby protected from unsuitable development and no additional policies are required. (See also Croxley Common Moor Habitat Management Plan 2013-2023 prepared by Countryside Management Services for TRDC).

They raise concerns about a proposed illuminated footpath across the Moor. We are aware of such a proposal, in relation to a proposed development on Tolpits Lane, but not in connection with the proposed (now approved) site of Croxley Danes School, which is remote from the Moor. This is simply a matter for development control and does not require a specific additional policy in the CGNP.

They suggest (in Annex A) that the Croxley Danes School site application (which has been determined) would provide opportunities to incorporate features beneficial to wildlife. This is no longer a matter for the proposed CGNP.

New Road Surgery
The requirements for new health service facilities, including GP surgeries, were discussed extensively in the preparation of the CGNP and the outcome is briefly mentioned in Appendix D (D.10.1). As it proved impossible to identify suitable sites with the landowners’ permission, there are no specific proposals in the CGNP.

Transport for London Spatial Planning
We are grateful for the update on the status of the proposed Metropolitan Line Extension (formerly the Croxley Rail Link). We accept that the land required to deliver the scheme may become the subject of a formal safeguarding direction, which we would support.

Transport for London Commercial Development
As Croxley Station is one of the few substantial sites for redevelopment within Croxley Green, we remain of the view that it should be the subject of a detailed planning brief (policy PRO3) to ensure it includes commercial and community uses which complement or enhance existing facilities within the Parish.

There are currently 93 designated parking spaces (plus 3 reserved for disabled use) and an area for motorcycles in the lower station car park accessed from the Watford Road to the east of the station. This represents just over 5% of the daily footfall through the station. There are also 7 parking bays in front of the station, three marked for staff, one for disabled use and three for taxis. The car park is typically underused at the weekend, with plenty of vacant spaces. The car park is typically full (or almost full) during the working week. On most weekdays there are almost no vacant spaces at some time between about 09:30 and 14:30, although some vehicles start to leave after midday and further vehicles come in to park.

We consider this justifies including the requirement for at least 100 spaces for commuter parking as there is already a commuter parking problem in the surrounding streets. Any reduction in provision would almost certainly lead to a requirement for extensive Controlled Parking Zones throughout Croxley Green, at considerable cost to the residents and TRDC.

CDA Herts
We note the supportive comments from CDA Herts concerning policy HO1.
CPRE Hertfordshire
We note the recent ECJ judgement referred to by CPRE Hertfordshire. We note this concerns the question of the extent to which it is possible to take account of measures intended to avoid or reduce the harmful effects of a project at the screening stage. We cannot see the relevance of this judgement in the case of the proposed CGNP.

Hertfordshire County Council Environment & Infrastructure:
Landscape Character Areas:
The character areas identified within the plan are not simply landscape character areas but areas where, by reason of topographical formation and historical developments (like the railway and the canal), Croxley Green is divided into areas of distinct identity, some of which include landscape features. These areas are complimentary to the hierarchy of landscape character areas identified in the Plan, the Appendices and the SEA and do not contradict or conflict with those set out on Hertfordshire County Council’s website “to provide an evidence base for Local Plans and set out strategies and guidelines for the protection, management and planning of the landscape.”

The area of the CGNP includes part of Hertfordshire Landscape Area 005 (Croxley Moor) and adjoins 006 (Lower Chess Valley), 007 (Sarratt Plateau) and 011 (Lower Gade Valley). None of the proposed policies or aims directly affects the Landscape Character Areas identified in the south Hertfordshire Landscape Character Assessment which have been published without evidence of publication date or currency. Some of the documents referenced are not readily available from the Herts CC website.

Green Infrastructure Strategy:
The CGNP has been developed to avoid conflict with the policies in the current TRDC Local Plan which include policies for Biodiversity, Trees, Woodlands, Watercourses and Landscaping. The CGNP seeks to conserve and enhance the existing natural features within the plan area. Developing green infrastructure under the holistic definition of a network of natural and semi-natural features, green spaces, rivers and lakes that intersperse and connect villages, towns and cities covers a much wider area than the CGNP and should more properly be considered as part of the TRDC Local Plan which is currently under review.

Transport planning & Highways:
No comment

Highways England
No comment

I trust that you and the Independent Examiner, Anne Skippers, will find this response helpful in your consideration of the proposed CGNP and the comments received from those consulted.

Yours sincerely,

David Allison
Clerk to the Council