

APPENDIX 2
SUMMARY OF MAIN ISSUES RAISED – NON-STATUTORY CONSULTEES

ISSUE	Officer Comment
<p>General objection to Green Belt development That neighbouring authorities should accommodate our housing needs Brownfield Land should be used first Loss of countryside</p>	<p>The National Planning Policy requires that the Green Belt Boundaries are reviewed through the Local Plan process and allow the changes to the boundary to accommodate development needs where ‘Exceptional Circumstances’ are proven.</p> <p>The Green Belt boundary will only be altered to accommodate development needs where we can justify and evidence ‘exceptional circumstances’ as defined in national planning policy. The priority is to make use of suitable brownfield land and underutilised land, optimising the density of development, have policies that promote a significant uplift in minimum density standards in towns and locations that are served by public transport (or can be through the provision or improvement to public transport) and to approach our neighbouring authorities to accommodate some of that need. Once those avenues have been exhausted then the only option left is to look at Green Belt release for the provision of sustainable development</p>
<p>Flood Risk from all sources (including surface water) and cumulative effect of development on surface water flooding</p>	<p>The Strategic Flood Risk Assessment Level 1 (SFRA) has taken account of all sources of flooding and has looked at the cumulative effects of development on flooding and factored in climate change.</p> <p>We have to follow a sequential approach to steer development to areas with the lowest probability of flooding (Flood Zone 1). Where there are no reasonably available sites in Flood Zone 1, we then have to consider sites in Flood Zone 2. Only where there are no reasonably available sites in Flood Zone 1 or 2 should the suitability of sites in Flood Zone 3 be considered.</p> <p>In some instances it may be possible to review site boundaries to exclude any higher risk flood areas. This will also be considered as part of the site assessment process.</p> <p>Sites within Flood Zones 2 and 3 will be subject to a Level 2 SFRA which will provide more detail about the flooding issues and suggest any mitigation measures where appropriate. The SFRA Level 2 recommendations will be considered in the assessment process. Any mitigation/remedial measures will be identified in the Infrastructure Delivery Plan and/or site specific S106 Agreement if appropriate</p>

<p>Increase in traffic and congestion and parking</p>	<p>A traffic assessment will be undertaken by Hertfordshire Highways Authority (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary. Any mitigation measures will be included in either site specific S106 agreements and/or the Infrastructure Delivery Plan.</p> <p>Site specific issues will be looked at the master planning and/or planning application stage depending on the size of the development.</p> <p>The Local Plan will contain policies that promote sustainable modes of transport such as opportunities to promote walking, cycling and public transport. HCC have identified issues with bus services across the district which will be considered and any deficits will be included in the Infrastructure Delivery Plan.</p>
<p>Lack of infrastructure to support development:</p> <p>Public Transport</p> <p>Health Provision</p> <p>Education facilities</p> <p>Community Facilities</p>	<p>Infrastructure associated with development within the Local Plan will be identified through the Infrastructure Delivery Plan which assesses the infrastructure capacity of health services, Education facilities, Emergency Services, Cultural Services, Waste facilities, local transport (traffic management, Highways improvements, bus network, cycling facilities), Green infrastructure (open spaces, parks and gardens and amenity spaces, natural and semi-natural green spaces, amenity green space, play areas) Water Infrastructure (waste water and water supply) Energy infrastructure (electricity and gas distribution and transmission) broadband facilities. The study is informed by a range of evidence base studies and by the infrastructure providers themselves.</p> <p>It should be noted that the larger developments will be capable of delivering infrastructure on site that will benefit the wider community.</p>
<p>Concern about the loss sports facilities/open spaces</p>	<p>National Planning Policy states that land that is currently used for sport and leisure should not be built unless an assessment has been undertaken which clearly shows that land is surplus to requirements.</p> <p>The Open Space, Sport & Recreation Study will determine the provision and quality of existing facilities, identify any surplus or deficit of provision, establish the likely future needs, and assist us setting new provision standards in the Local Plan.</p> <p>The study consists of:</p> <ul style="list-style-type: none"> • Open Space Assessment – provides detail with regards to what open space provision exists in the area, its condition, distribution and overall quality. It

	<p>will also consider the future requirements for provision and direction on future provision of accessible and high-quality provision for open spaces.</p> <ul style="list-style-type: none"> • Indoor Leisure Facilities and Needs Assessment – it is an assessment of need for sports halls, health and fitness and specialist facilities and looks at all indoor and built facilities for sport and physical activities including community centres and village halls. The study will identify any deficiencies and/or surpluses of provision and identify opportunities for new, enhanced and rationalised provision. • Playing Pitch Strategy Assessment – is a supply and demand assessment of playing pitch and other outdoor sports facilities in accordance with Sport England’s Playing Pitch Strategy Guidance and Assessing Needs and Opportunities guidance.
<p>Effects of development on Local Wildlife Sites/biodiversity Concern about the loss of protected trees/Ancient Woodlands</p>	<p>Hertfordshire County Council Ecology Team and Historical Environment team have provided detailed comments on sites where there are protected wildlife sites and these will be considered as part of the site assessment process. Any development proposals would have to protect any Ancient Woodlands and Wildlife sites in accordance with national planning policy. Consideration of the TPOs on sites will be taken into account at the master planning stage and/or planning application stage.</p>
<p>Concern that Rights of Way will be built on</p>	<p>The protection or enhancement of any Rights of Way will be considered. Rights of Way are often incorporated into development through careful site planning and often improved. There are also means by which Rights of Ways can be diverted should it be necessary. This will be considered during detailed master planning or at the planning application stage.</p>
<p>Capacity of waste water treatment works at Maple Cross Concern that the sewer networks won’t be able to cope</p>	<p>Thames Water have advised that since the 1st April 2018 all off site wastewater network reinforcement works necessary as a result of new development have and will be delivered by the relevant statutory undertaker. Local reinforcement works will be funded by the Infrastructure Charge which is a fixed charge for each new property connected. Wastewater treatment works infrastructure upgrades will be funded through water companies’ investment programmes which are based on a 5 year cycle known as the Asset Management Plan process.</p> <p>Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of occupation. In some circumstances Thames Water may seek the inclusion of phasing conditions in order to avoid adverse amenity impacts for existing or future users such as internal and external sewer flooding and pollution of land and water courses. To minimise the</p>

	likelihood of requiring such conditions developers are advised to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme.
Proposed high density of development at the station sites (Croxley Green and Chorleywood) and potential loss of station car parking. Concern about the noise and vibration on future residents	<p>The priority is to make use of suitable brownfield land and underutilised land, optimising the density of development, have policies that promote a significant uplift in minimum density standards in towns and locations that are served by public transport. National planning policy requires that where it is anticipated that there is a shortage of land to meet the development need of the area then there should be a significant increase in the average density of residential areas and specifically in locations that are served by public transport. Design of any proposed development will have to be considered carefully. Any development proposal will have to retain the car parking for the stations.</p> <p>Noise and vibration from the station need to be considered when new developments may create additional noise and when new developments would be sensitive to the prevailing acoustic environment. Neither the Noise policy statement for England nor the National Planning Policy Framework (which reflects the Noise policy statement) expects noise to be considered in isolation, separately from the economic, social and other environmental dimensions of proposed development. Consideration will need to be given to mitigating and minimising any effects as part of any development proposals.</p>
Concern about the indicative dwelling capacity	National planning policy requires that where it is anticipated that there is a shortage of land to meet the development need of the area then there should be a significant increase in the average density of residential areas. The dwelling capacity in the Potential Sites Document is indicative and will be reviewed as part of the site assessment process.
Concerns about access to individual sites	Access to sites have yet to be determined but will be looked at as part of the site assessment process. HCC as the Highways Authority will also be consulted. The fine detail of new accesses will be a consideration at the planning application stage.
Assumptions that any development will adversely affect conservation areas/listed Buildings	It cannot be assumed that development near to or adjacent to conservation areas or other heritage assets will automatically adversely affect the setting of such assets. Development proposals will need to demonstrate that they do not have an adverse effect on such assets through careful design and meeting the requirements of the National Planning Policy Framework.
Concerns that development will adversely affect the AONB	The status of the land will be a consideration in the site assessment process.
Concern about development de-valuing existing properties	This is not a planning consideration.