

APPENDIX 1

STATUTORY CONSULTEE RESPONSES TO POTENTIAL SITES CONSULTATION

RICKMANSWORTH

CFS40 LAND AT PARK ROAD

Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	<p>Due to the very unusual nature of this site, combined with the distinct lack of clarity over the nature and form of its prospective development/redevelopment, it is our very strong view that any further progress on the consultation of this site/these sites should be suspended until further, more detailed and helpful information on the site specifics is available; not least, inter alia,:-</p> <ul style="list-style-type: none"> •how does the “split” of the land work on both side of Rickmansworth High Street in terms of the numbers of residential units referred to? •how is the dominant aspect of the Green Belt (and the associated open land) on the eastern part of the site taken into account? Is any development proposed here at all? •what is broadly envisaged by the reference in the consultation text to “..open and/or amenity land..” on the Green Belt land and how does this affect (adversely or otherwise) the character and role of this land? •do the proposals involve physically “building over” some or all of the railway lines, or involve the removal of railway lines (in some parts)? •how are the very steeply sloping embankments in the vicinity of the railway land (especially on the western portion of land) to be taken into account? •given the very high residential numbers referred to in the consultation (185 – 260 dwellings), why are no community facilities being incorporated or even referred to somewhere in the site(s)? •given the close proximity to several water courses, is the Council 100% confident that the “low flooding risk” notation is accurate? Local/recent evidence would very strongly suggest otherwise. 	<p>Assessment of the site will continue. The site will not be withdrawn from the process.</p> <p>The questions raised in the bullet points cannot be answered as they mainly refer to site specific development proposals that have not yet been produced.</p> <p>The flood risk information is up to date.</p>

<ul style="list-style-type: none"> •is the train depot to be lost? •is there a net loss or net gain in car parking? •how is the protected common land (at Fortune Common) taken into account? <p>On face value the consultation sites (on both sides of the High Street) appear to represent an excessive and hugely negative level of development impact that also pays no heed whatsoever to the recent residential expansion/explosion(?) in and around the town in terms of further overloading the local infrastructure</p> <p>Notwithstanding the above comments and concerns, the eastern part of the eastern site is clearly in the Green Belt and entirely surrounded by the Green Belt and this typifies the character and appearance of the environment in the vicinity of the site. The site can also be read in conjunction with similar land on both sides of Scots Hill. Indeed, the tract of open Green Belt countryside on the eastern and northern sides of Rickmansworth forms the overwhelmingly predominant character. As a result, we consider this to be a strategic Green Belt site that fulfils the fundamental aim of such designations by</p>	<p>TfL has stated that the depot on the western parcel is to be retained.</p> <p>The land at Fortune Common is not included in the site boundaries and is already protected.</p> <p>There has been a change to national planning policy that requires higher densities of development in areas that are well served by public transport (such as this site).</p> <p>The priority is to make use of suitable brownfield land and underutilised land in the urban areas, optimising the density of development and national planning policy requires that policies that promote a <i>significant</i> uplift in minimum density standards in towns and locations that are served by public transport such as this site.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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) and broadband facilities. The study is informed by a range of evidence base studies and by the infrastructure providers themselves.</p> <p>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p> <p>A Green Belt Assessment will be undertaken to establish the degree to which sites achieve the five purposes of the Green Belt and will inform the site assessment process. Where there are 'Exceptional Circumstances' that are fully justified and evidenced the Green Belt boundary can be altered in line with the National Planning Policy Framework.</p>
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	<p>preventing/limiting development “sprawl” referred in national planning documents and satisfies the essential characteristic of Green Belts, which is to maintain openness. Further it achieves three of the five stated purposes of the Green Belt, as defined in the National Planning Policy Framework.</p> <p>That said, it is our view that until a much clearer indication is given on the aspects of the future development summarised in the above list of un-numbered bullet points, it is unsound and entirely unreasonable for the Council to promote the development of these sites, especially on such a massive scale and particularly given the very fragile infrastructure that is known to exist in Rickmansworth. Given the nature of the site and its multi-layered and overlapping current and proposed uses, we consider it is impossible for us to provide a full response. Consequently, a suspension of these sites from this consultation exercise is formally requested.</p>	<p>The site will not be withdrawn from the site assessment process.</p>
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PCS15 GRIGGS FIELD BATCHWORTH

Organisation	Comments	Officer Comments/Actions
<p>Batchworth Community Council</p>	<p>Same comments apply to CFS66 Objection to allocation of these sites on Green Belt Grounds as set out below:</p> <p>We consider that the sites (taken individually or combined) constitute a strategic part of the designated Green Belt in this area of the District. They fulfil the fundamental aim of such designations by preventing/limiting development “sprawl” to the south of Rickmansworth and very comprehensively satisfy the essential characteristic of Green Belts, which is to maintain openness. Further they achieve three of the five stated purposes of the Green Belt, as defined in the National Planning Policy Framework.</p> <p>The land is clearly open and visible especially when approaching from the north (i.e. up Batchworth Hill from Rickmansworth). From this perspective both parcels of land are seen as very exposed and prominent land sloping up from the carriageway, with further extensively open land visibly extending considerably</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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p>

	<p>to the south and west. In addition, as far as we are concerned, there is no clearly definable or “defensible boundary” further to the south or west that could effectively serve in the future as the controllable outer edge that could prevent even further incursions into the Green Belt/open fields in the form of inappropriate and unacceptable development.</p> <p>We would contend that the overwhelming sense of the character of the environment in this section of Batchworth Hill, even despite some residential curtilages on the other side on the road, is of extensive and attractive open countryside falling between the outer urban edges of Rickmansworth and the edges of Batchworth /Northwood. To develop this land, as outlined in the consultation document, would be a major and extremely harmful incursion into Green Belt land that is entirely without justification. There are no benefits of such scale as to outweigh the irreparable damage and material harm that would arise to this green field/Green Belt location.</p> <p>In our opinion, to accede to the release of these areas of land (at site ref PCS 15 and site ref CFS 66) would create a precedent of such magnitude as to make the defence of Green Belt land all around the District practically impossible under this consultation and in the future, such is the strategic Green Belt importance of the area(s)/land in question.</p> <p>Consequently, in light of all of the above factors, we would very strongly oppose the inclusion of both, or either, of these sites for future residential development.</p>	
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CFS41 RICKMANSWORTH STATION, STATION APPROACH

Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	<p>For similar reasons to those set out above (under site ref CFS40) and due equally to the very unusual nature of the Rickmansworth Station site, combined with the distinct lack of clarity over the nature and form of the prospective development/ redevelopment, it is again our very strong view that any further progress on the consultation of this site should be suspended until further, more detailed and helpful information on the site specifics is available to us.</p>	<p>Assessment of the site will continue. The site will not be withdrawn from the process.</p> <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 as required by national planning policy.</p> <p>30dph is a very low density – the current norm is 35dph. National planning policy states that where there is an anticipated shortage of land for meeting identified</p>

	<p>We recognise the very sustainable nature of the site (in transportation terms) but consider the proposed upper density of circa 30dpa is excessive in this location.</p> <p>We would ask for clarification from the Council as to why the proximity of the Rickmansworth Town Conservation Area was not mentioned in the text used regarding this consultation site? It is used in regard to CFS 42.</p>	<p>housing needs that planning policies and decisions avoid homes being built at low densities, particularly in locations that are served well by public transport (such as this site).</p> <p>Because the site is not adjacent to the conservation area boundary. However, any development proposals on this site would need to consider the views from within and outside the conservation area.</p>
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CFS42 LAND REAR OF EBURY ROAD

Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	<p>Objects to the inclusion of the site and requests it to be withdrawn for the following reasons:</p> <p>The site is clearly in the Green Belt and is directly related, physically and visually, to the Green Belt to the south and east. It typifies the character and appearance of the wider environment in the vicinity of the site, especially when leaving the Ebury Roundabout in a south easterly direction. The site must be read strategically in conjunction with the very similar open Green Belt land on the rest of the north side of Riverside Drive and indeed with land on the opposite side of Riverside Drive that continues through to the Aquadrome.</p> <p>It is our view that the potential threat to the loss of this piece of Green Belt land places the remainder of Green Belt land on the north of Riverside Drive in immediate jeopardy.</p> <p>In our opinion the rear garden boundaries of the properties in Ebury Road that abut the consultation site provide the strong definable edge of the urban/built up area in this part of Rickmansworth.</p> <p>As a result, we consider this to be a strategic Green Belt site that fulfils the fundamental aim of such designations by preventing/limiting development “sprawl” referred in national planning documents and satisfies the essential characteristic of Green Belts, which is to maintain openness. Further it achieves three of the five stated purposes of the Green Belt, as defined in the National Planning Policy Framework particularly in reference to d) to preserve the setting and special character of historic</p>	<p>Assessment of the site will continue. The site will not be withdrawn from the process.</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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p>

	<p>towns as the site immediately abuts the southwestern corner of the Rickmansworth Conservation Area at this point.</p> <p>On this point, any development of the land would potentially adversely affect the setting of, and approach to, the Conservation Area.</p> <p>In addition, the promotion of residential development in a medium to high risk flood area is comprehensively unsafe, unsustainable and unsound in planning terms and should NOT be supported on any level.</p> <p>In our opinion there is also wholly inadequate provision in terms of sewer capacity and all/any infrastructure to support or sustain the site is severely lacking.</p>	<p>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.</p> <p>Flooding issues have been identified through the SFRA Level 1 study. The site may be subject to a Level 2 SFRA which will provide more detail about the flooding issues. SFRA Level 2 recommendations will be considered in the assessment process. Any mitigation measures will be identified in the Infrastructure Delivery Plan and/or site specific S106 Agreement if appropriate.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p>
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CFS43 NORTH OF MOOR LANE

Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	<p>The following comments also apply to CFS44 and ACFS11.</p> <p>Objections on Green Belt grounds as set out below:</p> <p>The sites are all in the Green Belt and represent part of an unbroken area of distinctive open land on the northern side of Moor Lane, just as it leaves the short stretch of ribbon housing on the south east side/corner of Batchworth/Rickmansworth and</p>	<p>Assessment of the site will continue. The site will not be withdrawn from the process.</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</p>

	<p>exposes vistas of open Green Belt countryside towards the Grand Union Canal to the north.</p> <p>To promote the development of this land and in so doing create an enclave of circa 35 – 50 dwellings (or potentially 55 – 80 with all three site consultation figures taken into account) would fundamentally and unacceptably alter the character of Rickmansworth/Three Rivers District when travelling out of the town and east along Moor Lane.</p> <p>To promote the development of the open Green Belt land, potentially stretching from the Moor Lane road frontage to the canal-side of the Grand Union Canal, and the widespread harm this would cause, is entirely unacceptable under any analysis.</p> <p>In light of the above, we consider that these sites, individually and collectively, are a strategic part of the designated Green Belt in this area of the District. They all fulfil the fundamental aim of such designations by preventing/limiting development “sprawl” to the east/south east of the built-up part of Rickmansworth and the space between Rickmansworth and Moor Park (to the east). They all satisfy the essential characteristic of Green Belts, which is to maintain openness. Further they combine to achieve three of the five stated purposes of the Green Belt, as defined in the National Planning Policy Framework.</p>	<p>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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p>
CFS44 WEST OF HAMPTON HALL FARM		
Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	Same comments as CFS43 and ACFS11.	See Officer comments to CFS43
CFS59 LAND ON LONDON ROAD		
Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	<p>In our opinion, this is important Green Belt land that forms part of the ribbon of primarily residential properties following the gradient rise on the west side on London Road/Batchworth Hill. It is the first tangible “gap” in the ribbon/linear on the west side when travelling up Batchworth Hill/London Road and is framed, to some degree, by the residential curtilages on both flanks that appear to have similar widths and depths and thereby create a “borderline” sense of “enclosure” or inbuilt restraint to the development opportunity of the site. We acknowledge this</p>	<p>Support for the proposed residential care home noted on this Green Belt site.</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</p>

	<p>stands to be interpreted in planning terms depending upon interests and circumstances.</p> <p>In addition, due to the topography, and the location of the carriageway on lower land than the west side of the road at this point, long distance views to the west across open countryside are much more restricted compared to other sites referred to elsewhere in this document.</p> <p>Consequently, in light of the above, we consider it may be possible for the site to accommodate a strictly low-key, high quality care home facility that is entirely sympathetic to the environment and 100% respectful of the privacy and amenities of neighbouring properties. This would need to include, inter alia, strong well planted flank boundaries of substantial width, generous distances between any new building and existing adjacent buildings and incorporate a very well-defined rear boundary that ensures no further encroachment into the open Green Belt countryside to the rear/west.</p>	<p>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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p>
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CFS60 AFFINITY WATER DEPOT

Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	<p>In very broad terms we wish to raise no specific concerns regarding the principle of a residential use of this site. However, there are serious issues to address; not least:-</p> <p>(i) listed buildings on the site must be safeguarded/respected and protected in full</p> <p>(ii) all on site and off site flood risks need to be fully investigated prior to the release of this land for residential purposes, so that the lives of future residents are not put in any risk.</p> <p>(iii) Our key concern relates to traffic generation. As highlighted above, the three sites at site ref CFS 43 (land north of Moor Lane), site ref ACFS 11 (also land north of Moor Lane) and site ref CFS 44 (land west of Hampton Hall Farm) suggest that between 55 – 80 dwellings in total are possible across the three sites (notwithstanding the strong Green Belt objection).</p>	<p>No specific objections to the site noted.</p> <p>Heritage assets will be considered in line with national planning policy.</p> <p>Flooding issues have been identified through the SFRA Level 1 study. The site will be subject to a Level 2 SFRA which will provide more detail about the flooding issues. SFRA Level 2 recommendations will be considered in the assessment process. Any mitigation measures will be identified in the Infrastructure Delivery Plan and/or site specific S106 Agreement if appropriate.</p> <p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (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>We consider that the additional 75 – 90 dwellings referred to on the Affinity Water site, when added to that referred above (i.e. between 55 – 80 dwellings), will potentially have very serious consequences in traffic congestion terms for this part of the town; suggesting as it does, between 140 – 170 dwellings in total in very close proximity across these four consultation sites.</p> <p>We can foresee no scope to introduce the potential traffic associated with the estimated 140 – 170 dwellings from these four consultation sites onto the local road network on the south side of Rickmansworth; without very serious effects on delays, queueing distances and general traffic conditions.</p> <p>In view of this we would recommend that the Council commits to an independent, wide ranging traffic/transportation impact assessment to assess, inter alia, road capacity, potential delays, overloaded junctions at peak times, anticipated queueing distances and general predicted traffic conditions etc. BEFORE any of the above four sites are progressed within this consultation exercise.</p>	
CFS66 LAND AT BATCHWORTH ROAD		
Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	<p>Same comments apply to PCS15</p> <p>Objection to allocation of these sites on Green Belt Grounds as set out below:</p> <p>We consider that the sites (taken individually or combined) constitute a strategic part of the designated Green Belt in this area of the District. They fulfil the fundamental aim of such designations by preventing/limiting development “sprawl” to the south of Rickmansworth and very comprehensively satisfy the essential characteristic of Green Belts, which is to maintain openness. Further they achieve three of the five stated purposes of the Green Belt, as defined in the National Planning Policy Framework.</p> <p>The land is clearly open and visible especially when approaching from the north (i.e. up Batchworth Hill from Rickmansworth). From this perspective both parcels of land are seen as very exposed and prominent land sloping up from the carriageway,</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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p>

	<p>with further extensively open land visibly extending considerably to the south and west. In addition, as far as we are concerned, there is no clearly definable or “defensible boundary” further to the south or west that could effectively serve in the future as the controllable outer edge that could prevent even further incursions into the Green Belt/open fields in the form of inappropriate and unacceptable development.</p> <p>We would contend that the overwhelming sense of the character of the environment in this section of Batchworth Hill, even despite some residential curtilages on the other side on the road, is of extensive and attractive open countryside falling between the outer urban edges of Rickmansworth and the edges of Batchworth /Northwood. To develop this land, as outlined in the consultation document, would be a major and extremely harmful incursion into Green Belt land that is entirely without justification. There are no benefits of such scale as to outweigh the irreparable damage and material harm that would arise to this green field/Green Belt location.</p> <p>In our opinion, to accede to the release of these areas of land (at site ref PCS 15 and site ref CFS 66) would create a precedent of such magnitude as to make the defence of Green Belt land all around the District practically impossible under this consultation and in the future, such is the strategic Green Belt importance of the area(s)/land in question.</p>	
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CFS77 RICKMANSWORTH LIBRARY

Organisation	Comments	Officer Comments/Actions
HCC Libraries Service	<p>State that there is scope for exploring new ways of delivering the service in all libraries in Three Rivers, including the possibility of co-location with other service providers where this benefits the relevant service providers and improves the location or provides a more modern library service in a community. This could also result in an increase in floor space in some library buildings to accommodate additional community facilities.</p> <p>They consider that the library is not considered in need of relocation as it is in the centre of Rickmansworth, with good passing footfall and is housed in a building that is fit for purpose. Some of the facilities within the library are also due to be</p>	<p>HCC’s approach to delivering the service including the possibility of co-location with other service providers where this benefits the relevant service providers and improves the location or provides a more modern library service in a community is noted.</p> <p>Objection noted however seems to contradict the comment above and the re-location of other libraries within Hertfordshire. TRDC is located a few metres away from the existing building in the centre of Rickmansworth and can provide improved and modern facilities with better parking together with access to other</p>

	upgraded. HCC Property would resist a move to Three Rivers House. State that there is a lease until 2066 and no break clause.	services. The Council has the ability to use compulsory purchase powers. The National Planning Policy Framework states that LPAs should make use of the full range of powers available to them, including compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes. (Paragraph119). Further discussions with HCC Property and Library Services to take place.
Batchworth Community Council	<p>We strongly oppose the loss of the community/library facility on this highly accessible and long established “community focused” site. Its speculative development by the suggested 5 – 8 dwellings is a venture that does not have any regard to the community interests of the town and further seriously undermines the potential to create a small community “hub” in a key location.</p> <p>It is our view that the existing library site should be enhanced with the co-creation of a community facility/meeting place and with the prospect of establishing a positive environment for small/local business “start-up” units.</p>	<p>Objection noted.</p> <p>It is not proposed that the library will be lost but located in the equally accessible Council offices to enable the development of the site for residential and commercial uses to vitalise the High Street.</p> <p>The relocation of the Library to the Councils offices will result in an enhanced facility.</p>
ACFS10 ANDREW LEY FARM, HAREFIELD ROAD		
Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	<p>Oppose the site for residential development on Green Belt grounds as follows:</p> <p>The site is clearly in the Green Belt and entirely surrounded by the Green Belt and this typifies the character and appearance of the environment in the vicinity of the site. The site can also be read in conjunction with similar land on the other side of Harefield Road. Indeed, the tract of open Green Belt countryside here runs from the southern edge of Rickmansworth (near the entrance to the Aquadrome) all the way south east to the District Boundary.</p> <p>As a result, we consider this to be a strategic Green Belt site that fulfils the fundamental aim of such designations by preventing/limiting development “sprawl” referred in national planning documents and satisfies the essential characteristic of Green Belts, which is to maintain openness. Further it achieves three of the five stated purposes of the Green Belt, as defined in the National Planning Policy Framework.</p> <p>The suggested development of 12 dwellings (maximum) would establish/consolidate an urban character on this site to the</p>	<p>Objection noted.</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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p>

	<p>detriment of the openness of the Green Belt countryside and in direct contradiction of local and national Green Belt policy. It would also introduce housing in a highly unsustainable location, separated from local facilities or infrastructure and thereby place high dependence solely on private means of transport to access the site.</p> <p>If the proposal were to be modified to suggest only the conversion of good quality existing farm buildings to a new low key residential use (and in low numbers) that respected the Green Belt location and also avoided any development in depth such that all of the rear portion of the site was left free of development, parking or gardens, there may be more merit to the scheme. However, we are strongly of the view that in order to build in long term planning constraints on this isolated Green Belt site, the Green Belt notation should not be removed as part of this or any future consultation exercise.</p> <p>In the meantime, and without that information, and in light of all of the above factors, we would strongly oppose its inclusion as a site of future residential development.</p>	<p>Consideration will also be given to the conversion of existing buildings in line with national planning policy on Green Belt.</p>
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ACFS11 LAND NORTH OF MOOR LANE

Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	<p>The following comments also apply to CFS43 and CFS44. Objections on Green Belt grounds as set out below:</p> <p>The sites are all in the Green Belt and represent part of an unbroken area of distinctive open land on the northern side of Moor Lane, just as its leaves the short stretch of ribbon housing on the south east side/corner of Batchworth/Rickmansworth and exposes vistas of open Green Belt countryside towards the Grand Union Canal to the north.</p> <p>To promote the development of this land and in so doing create an enclave of circa 35 – 50 dwellings (or potentially 55 – 80 with all three site consultation figures taken into account) would fundamentally and unacceptably alter the character of Rickmansworth/Three Rivers District when travelling out of the town and east along Moor Lane.</p>	<p>Assessment of the site will continue. The site will not be withdrawn from the process.</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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p>

	<p>To promote the development of the open Green Belt land, potentially stretching from the Moor Lane road frontage to the canal-side of the Grand Union Canal, and the widespread harm this would cause, is entirely unacceptable under any analysis.</p> <p>In light of the above, we consider that these sites, individually and collectively, are a strategic part of the designated Green Belt in this area of the District. They all fulfil the fundamental aim of such designations by preventing/limiting development “sprawl” to the east/south east of the built-up part of Rickmansworth and the space between Rickmansworth and Moor Park (to the east). They all satisfy the essential characteristic of Green Belts, which is to maintain openness. Further they combine to achieve three of the five stated purposes of the Green Belt, as defined in the National Planning Policy Framework.</p>	
PCS17 DEPOT HAREFIELD ROAD - No comments		
OSPF1 THE ISLAND, CHURCH STREET – No comments		
SOUTH OXHEY		
CFS52 LAND AT SIR JAMES ALTHAM		
Organisation	Comments	Officer Comments/Actions
Watford Rural Parish Council	<p>Unsuitable because of a lack of infrastructure and object to the loss of the football club which is used for community events and parties.</p> <p>Concern that to get to the nearest secondary school you would have to cross a bridge and go via Bushey Arches which is already congested. Concern that there will be a significant impact on traffic levels going through Carpenders Park.</p> <p>Concerned that the W19 bus is always full, that the train station, doctor’s surgery and secondary school are not walkable so people will travel by car.</p> <p>Believe that the nearest primary school is oversubscribed and believe that adding new classrooms would destroy the school’s appeal.</p>	<p>The Open Space Sport & Recreation Study will provide information on the football facilities in relation to quality and quantity of the provision and take account of the consultation responses received from the football club themselves. The Study’s findings will inform any decisions relating to the retention or relocation of the football club.</p> <p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (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>HCC have identified issues with bus services across the district which will be considered and included in the Infrastructure Delivery Plan.</p> <p>HCC as the Education Authority will advise of any issues with regards to education facilities. Any deficiencies in education facilities will be identified in the Infrastructure Delivery Plan.</p>
CFS53 OXHEY GOLF COURSE AND DRIVING RANGE		

Organisation	Comments	Officer Comments/Actions	
Watford Borough Council	Potential traffic impacts on the local area will be subject to transport modelling, however, site CFS53 in conjunction with sites CFS11, CFS69 and PCS47 could have impacts on the local road network, particularly in the area near Bushey arches and railway station which already suffer congestion issues at peak times.	Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. Any mitigation measures will be included in either site specific S106 agreements and/or the Infrastructure Delivery Plan	
Watford Rural Parish Council	<p>That there is a covenant that the land be used for leisure purposes only.</p> <p>There is a Right of Way, a stream and a dell and pylons.</p> <p>Concerns about flooding on the site as set out in Potential Sites Document.</p> <p>Concern that building on the land will have a detrimental effect on drinking water as the site is within a groundwater source protection inner zone 1.</p> <p>Access to GPs, buses, Doctors, trains and primary schools by foot. General concern about increase in traffic and concern about parking.</p>	<p>Noted. Covenants can be changed and are not a material consideration in the determination of planning applications. That said we do have to be reasonably satisfied that development can be achieved within a 15 year period. Land Registry Search to be undertaken to determine if there are any covenants.</p> <p>Noted. The protection or enhancement of any Right of Way will be considered. There is no suggestion that the Right of Way will be built on. 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 at a detailed masterplanning or planning application stage.</p> <p>Flooding issues have been identified through the SFRA Level 1 study. The site will be subject to a Level 2 SFRA which will provide more detail about the flooding issues and suggest any mitigation measures where appropriate. SFRA Level 2 recommendations will be considered in the assessment process. Any mitigation measures will be identified in the Infrastructure Delivery Plan and/or site specific S106 Agreement if appropriate.</p> <p>Determine whether the site is within a protection zone and what the implications are for any development, as well as comments/advice from the Environment Agency. To be considered as part of the assessment process going forward.</p> <p>Access by foot to services is noted.</p> <p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary. Any traffic mitigation measures will be included in either site specific S106 agreements and/or the Infrastructure Delivery Plan.</p>	

		Parking standards will be considered as part of the review of planning policies..
PCS18 LAND SOUTH OF ST JOSEPHS – No Comments		
CARPENDERS PARK		
CFS11 CARPENDERS PARK FARM, OXHEY LANE		
Organisation	Comments	Officer Comments/Actions
Watford Borough Council	<p>Potential traffic impacts on the local area will be subject to transport modelling, however, sites CFS11, CFS47, CFS69 in conjunction with site CFS53 could have impacts on the local road network, particularly in the area near Bushey arches and railway station which already suffer congestion issues at peak times. To encourage new and existing residents use sustainable transport rather than relying on private vehicles, and to help mitigate the effect of increased traffic in the wider road network, if the site(s) was carried forward provision should be made for quality pedestrian and cycle routes to Carpenders Park railway station.</p> <p>These sites, individually and cumulatively, will act to reduce the gap between the built up areas around Watford Heath and Carpenders Park. In this context the compromised separation and contrary to the objectives associated with Green Belt designations set out in the National Planning Policy Framework. Development on these sites is not supported given the array of potential sites identified in this consultation document that could also be considered as part of the Local Plan.</p>	<p>Noted. Sustainable transport modes such as walking and cycling facilities will be considered including those to Carpenders Park Station.</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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p>
Watford Rural Parish Council	<p>Concern about safety with a 40mph speed limit on the road.</p> <p>State that the proposed secondary school on this site would not serve the local community, that there is no provision for a primary school and local ones are oversubscribed.</p>	<p>HCC as the Highways Authority will identify any safety issues relating to the speed limit. Any identified issues by the Highways Authority will be considered as part of the assessment process and any identified mitigation measures can be addressed through site specific S106 agreements and/or Infrastructure Delivery Plan.</p> <p>The secondary school will serve the local community and that of adjacent authority (Hertsmere). The provision of a secondary school will relieve the pressure on existing schools enabling more spaces across the secondary school planning area. HCC as the Education Authority will identify any shortages relating to education provision. Although the site was purchased primarily for a secondary school, the site may also have the capacity to accommodate a primary school (subject to considerations).</p>

	<p>Concern that nearest services are only accessible by car.</p> <p>Mention the Herts Middlesex and Wildlife Trust 'Ecological Networks Report' highlighted these sites as a priority habitat network creation area and that development of these sites will impact biodiversity by fragmenting the network of semi-natural habitat.</p> <p>Concern about the location of development to AQMAs in Harrow.</p>	<p>Noted. There may be potential for the provision of some services on the site and accessibility to services by walking or cycling (more sustainable forms of transport) will be considered.</p> <p>Noted. The Herts Middlesex and Wildlife Trust Ecological Networks Report sets out maps of potential networks. The report states that these 'can inform local plans, identifying where the best opportunities are likely to be for delivering the new objectives on enhancing ecological networks in national planning guidance. They can alert developers and planning authorities to where the greatest sensitivities are likely to be in relation to the protection and enhancement of ecological networks, as well as where there is greatest potential for biodiversity gains from development. Potential habitat network maps on their own should not be considered a barrier to development. Indeed, sensitively planned new development can contribute positively to ecological networks.'</p> <p>Consideration to the enhancement or improvement to biodiversity networks will be considered in any masterplanning of the sites and a net gain of biodiversity will be sought in line with national planning policy.</p> <p>Noted, The site is not located in an AQMA. Air pollution is a concern and opportunities to improve air quality or mitigate impacts will be identified (such as through traffic management, travel plans, green infrastructure provision and enhancement etc.).</p>
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CFS12 KEBBELL HOUSE AND LAND TO THE REAR, DELTA GAIN

Organisation	Comments	Officer Comments/Actions
Watford Rural Parish Council	<p>Concern about the lack of parking facilities in this area (adjacent to station and employment site and local shops) and that there are issues with parking which causes problems for the bus route.</p> <p>Refer to a previous planning application that was refused as overdevelopment and seek clarification as to how a site where development has already started can be allocated for more.</p> <p>Reiterates flood information from Potential Sites Document.</p>	<p>The employment designation is likely to be removed from this site as conversion of the main office building to residential has already taken place under Permitted Development Rights. Car parking is an issue although there is a station car park available.</p> <p>There has been a change to national planning policy that requires higher densities of development in areas that are well served by public transport (such as this site).</p> <p>Flooding issues have been identified through the SFRA Level 1 study. The site will be subject to a Level 2 SFRA which will provide more detail about the flooding issues and suggest any mitigation measures where appropriate. SFRA Level 2 recommendations will be considered in the assessment process. Any mitigation</p>

	Object to the site because there is no infrastructure	measures will be identified in the Infrastructure Delivery Plan and/or site specific S106 Agreement if appropriate. The site is located next to a station, main bus routes, shops and local services.
CFS14 LAND NORTH OF OXHEY LANE		
Organisation	Comments	Officer Comments/Actions
Watford Borough Council	CFS11, CFS13, CFS14 (and potentially site PCS47) These sites, individually and cumulatively, will act to reduce the gap between the built up areas around Watford Heath and Carpenders Park. In this context the compromised separation and contrary to the objectives associated with Green Belt designations set out in the National Planning Policy Framework. Development on these sites is not supported given the array of potential sites identified in this consultation document that could also be considered as part of the Local Plan.	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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF. Most of the potential sites in the document are also in the Green Belt and even if all the sites were suitable for allocation they would not meet the housing target.
Watford Rural Parish Council	Same comments as for CFS11, CFS13: Concern about safety with a 40mph speed limit on the road. Concern that nearest services are only accessible by car. State that the proposed secondary school on this site would not serve the local community, that there is no provision for a primary school and local ones are oversubscribed.	HCC as the Highways Authority will identify any safety issues relating to the speed limit. Any identified issues by the Highways Authority will be considered as part of the assessment process and any identified mitigation measures can be addressed through site specific S106 agreements and/or Infrastructure Delivery Plan. Noted. There may be potential for the provision of some services on the site and accessibility to services by walking or cycling (more sustainable forms of transport) will be considered. There is no secondary school proposed for this site. HCC as the Education Authority will identify any shortages relating to education provision and will be considered when allocating land for development in the Local Plan. Consideration of education requirements will be considered as part of the assessment process and identified in the Infrastructure Delivery Plan.

	<p>Concern about the location of development to AQMAs in Harrow</p> <p>Mention the Herts Middlesex and Wildlife Trust 'Ecological Networks Report' highlighted these sites as a priority habitat network creation area and that development of these sites will impact biodiversity by fragmenting the network of semi-natural habitat</p>	<p>Noted, The site is not located in an AQMA. Air pollution is a concern and opportunities to improve air quality or mitigate impacts will be identified (such as through traffic management, travel plans, green infrastructure provision and enhancement etc.).</p> <p>Noted. The Herts Middlesex and Wildlife Trust Ecological Networks Report sets out maps of potential networks. The report states that these 'can inform local plans, identifying where the best opportunities are likely to be for delivering the new objectives on enhancing ecological networks in national planning guidance. They can alert developers and planning authorities to where the greatest sensitivities are likely to be in relation to the protection and enhancement of ecological networks, as well as where there is greatest potential for biodiversity gains from development. Potential habitat network maps on their own should not be considered a barrier to development. Indeed, sensitively planned new development can contribute positively to ecological networks.'</p> <p>Consideration to the enhancement or improvement to biodiversity networks will be considered in any masterplanning of the sites and a net gain of biodiversity will be sought in line with national planning policy.</p>
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CFS69 LAND AT CARPENDERS PARK FARM

Organisation	Comments	Officer Comments/Actions
Watford Borough Council	Potential traffic impacts on the local area will be subject to transport modelling, however, sites CFS11, CFS47, CFS69 in conjunction with site CFS53 could have impacts on the local road network, particularly in the area near Bushey arches and railway station which already suffer congestion issues at peak times. To encourage new and existing residents use sustainable transport rather than relying on private vehicles, and to help mitigate the effect of increased traffic in the wider road network, if the site(s) was carried forward provision should be made for quality pedestrian and cycle routes to Carpenders Park railway station.	Noted. Sustainable transport modes such as walking and cycling facilities will be considered including those to Carpenders Park Station.
Watford Rural Parish Council	The area contains a preventative flood barrier in the form of a bund – concern that development would impede the bund and result in flooding. Concern about the capacity of the drainage system.	The Level 1 SFRA considers all potential sources of flooding – main rivers, ordinary watercourses, surface water and ground water and sewer flooding. It also considers how the risks may be mitigated and assess the current condition and standard of protection from existing flood defences. A Level 2 SFRA will be undertaken on sites which will provide recommendations for and potential

	<p>The Herts Middlesex and Wildlife Trust 'Ecological Networks Report' highlighted these sites as a priority habitat network creation area and that development of these sites will impact biodiversity by fragmenting the network of semi-natural habitat and concern that the development of the land would eradicate the opportunity to improve the water quality of the area.</p> <p>Concern about the location of development to AQMAs in Harrow</p> <p>Concern about safety with a 40mph speed limit on the road.</p> <p>Nearest station, GP, secondary school are not accessible by walking so there is more reliance on the car.</p> <p>State that the proposed secondary school on this site would not serve the local community, that there is no provision for a primary school and local ones are oversubscribed.</p>	<p>measures for managing flood risk. The findings of this study will help inform the site assessment process.</p> <p>Noted. The Herts Middlesex and Wildlife Trust Ecological Networks Report sets out maps of potential networks. The report states that these 'can inform local plans, identifying where the best opportunities are likely to be for delivering the new objectives on enhancing ecological networks in national planning guidance. They can alert developers and planning authorities to where the greatest sensitivities are likely to be in relation to the protection and enhancement of ecological networks, as well as where there is greatest potential for biodiversity gains from development. Potential habitat network maps on their own should not be considered a barrier to development. Indeed, sensitively planned new development can contribute positively to ecological networks.'</p> <p>Consideration to the enhancement or improvement to biodiversity networks will be considered in any masterplanning of the sites and a net gain of biodiversity will be sought in line with national planning policy.</p> <p>Noted, The site is not located in an AQMA. Air pollution is a concern and opportunities to improve air quality or mitigate impacts will be identified (such as through traffic management, travel plans, green infrastructure provision and enhancement etc.).</p> <p>HCC as the Highways Authority will identify any safety issues relating to the speed limit. Any identified issues by the Highways Authority will be considered as part of the assessment process and any identified mitigation measures can be addressed through site specific S106 agreements and/or Infrastructure Delivery Plan.</p> <p>Noted. Accessibility to services and how this can be addressed will be considered.</p> <p>The secondary school will serve the local community and that of adjacent authority. The provision of a secondary school will relieve the pressure on existing schools enabling more spaces across the secondary school planning area. HCC as the Education Authority will identify any shortages relating to education provision. Although the site was purchased primarily for a secondary school, the site may have capacity to accommodate a primary school (subject to considerations). Consideration of education requirements will be considered as part of the assessment process and identified in the Infrastructure Delivery Plan.</p>
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PCS2 EAST CARPENDERS PARK		
Organisation	Comments	Officer Comments/Action
Watford Rural Parish Council	<p>Concern about development close to the cemetery causing distress.</p> <p>Concern that development would harm the wildlife site adjacent to the site boundary</p> <p>Land is leased to the garden centre which provides employment in an area of low employment</p> <p>Believe that the site contains an ancient hedgerow.</p> <p>Nearest station, GP, secondary school are not accessible by walking so there is more reliance on the car. Nearest bus stop for W19 is not within walking distance.</p>	<p>Noted. Issues with construction can be dealt with by condition on planning permissions – for example setting times when certain works can be carried out to limit any impact.</p> <p>Any development proposals would have to take account of the effect on the wild life site in line with national planning policy. There will be planning policies in the Local Plan regarding the conservation and enhancement of the natural environment.</p> <p>Land ownership issues will be considered as part of the site assessment process. The land is not currently used by the garden centre so there will be no loss of employment. Unaware of any plans to extend the garden centre.</p> <p>There is no listing of an ancient hedgerow on the site.</p> <p>Noted. Accessibility to services and how this can be addressed will be considered. HCC have identified issues with bus services across the district which will be considered and included in the Infrastructure Delivery Plan.</p>
PCS47 SOUTH OF LITTLE OXHEY LANE		
Organisation	Comments	Officer Comments/Actions
Watford Borough Council	<p>Potential traffic impacts on the local area will be subject to transport modelling, however, sites CFS11, CFS47, CFS69 in conjunction with site CFS53 could have impacts on the local road network, particularly in the area near Bushey arches and railway station which already suffer congestion issues at peak times. To encourage new and existing residents use sustainable transport rather than relying on private vehicles, and to help mitigate the effect of increased traffic in the wider road network, if the site(s) was carried forward provision should be made for quality pedestrian and cycle routes to Carpenders Park railway station.</p> <p>CFS11, CFS13, CFS14 (and potentially site PCS47 These sites, individually and cumulatively, will act to reduce the gap between the built up areas around Watford Heath and Carpenders Park. In this context the compromised separation and contrary to the</p>	<p>Noted. Sustainable transport modes such as walking and cycling facilities will be considered including those to Carpenders Park Station.</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</p>

	objectives associated with Green Belt designations set out in the National Planning Policy Framework. Development on these sites is not supported given the array of potential sites identified in this consultation document that could also be considered as part of the Local Plan.	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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.
Watford Rural Parish Council	<p>Concern that this road is narrow and that the railway bridge is single traffic and relies on drivers to give way. Suggestion that the bridge would need substantial rebuilding.</p> <p>Nearest bus stop for W19 is some distance.</p> <p>Nearest station, GP, secondary school are not accessible by walking so there is more reliance on the car.</p> <p>Primary school is over subscribed.</p> <p>States that it is a major flood area as has a high risk of surface water flooding according to a government web site. There are occasions when there is flooding on the road from the run off from the fields and caused flooding in homes in St Georges Way, Compton Place, Harrow Way and The Mead.</p>	<p>There is a single track bridge across the railway. Redevelopment of the bridge may not be the only solution. HCC as the Highway Authority will identify any safety/traffic issues relating to this. Any identified issues by the Highways Authority will be considered as part of the assessment process and any identified mitigation measures can be addressed through site specific S106 agreements and/or Infrastructure Delivery Plan.</p> <p>HCC have identified issues with bus services across the district which will be considered and included in the Infrastructure Delivery Plan.</p> <p>Noted. Accessibility to services and how this can be addressed will be considered.</p> <p>HCC as the Education Authority will advise of any issues with regards to education facilities. Any deficiencies in education facilities will be identified in the Infrastructure Delivery Plan.</p> <p>The Level 1 SFRA did not identify this site as being at risk from surface water flooding.</p> <p>The road itself might be at risk and HCC as the Local Flood Authority will be able to advise on this. It is possible for new developments to contribute to mitigation measures where there are issues of surface water flooding in the vicinity of the site if it is shown that the development would have an impact on the risk of flooding. Any mitigation measures can be secured by S106 Agreement where necessary.</p>
CFS13 LAND AT OXHEY LANE, WATFORD HEATH		
Organisation	Comments	Officer Comments/Actions
Watford Borough Council	CFS11, CFS13, CFS14 (and potentially site PCS47 These sites, individually and cumulatively, will act to reduce the gap between the built up areas around Watford Heath and Carpenders Park.	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

	In this context the compromised separation and contrary to the objectives associated with Green Belt designations set out in the National Planning Policy Framework. Development on these sites is not supported given the array of potential sites identified in this consultation document that could also be considered as part of the Local Plan.	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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.
Watford Rural Parish Council	<p>Same objections as to site CFS11: Concern about safety with a 40mph speed limit on the road.</p> <p>State that the proposed secondary school on this site would not serve the local community, that there is no provision for a primary school and local ones are oversubscribed.</p> <p>Concern that nearest services are only accessible by car.</p>	<p>HCC as the Highways Authority will identify any safety issues relating to the speed limit. Any identified issues by the Highways Authority will be considered as part of the assessment process and any identified mitigation measures can be addressed through site specific S106 agreements and/or Infrastructure Delivery Plan.</p> <p>There is no secondary school proposed for this site. HCC as the Education Authority will identify any shortages relating to education provision and will be considered when allocating land for development in the Local Plan.</p> <p>Noted. Accessibility to services and how this can be addressed (i.e. through the provision of more sustainable forms of transport) will be considered.</p>

OXHEY HALL

CFS67 LAND NORTH OF OTLEY HALL FARM

Organisation	Comments	Officer Comments/Actions
Watford Borough Council	<p>Development of this site would act to reduce the separation between Watford and Oxhey Hall and compromise the Green Belt designation in this area.</p> <p>Areas located in flood zone 2 can be mitigated through design, however, an assessment on the potential impact on biodiversity</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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p> <p>Noted. In the case of development, schemes to protect and enhance biodiversity can be implemented to mitigate any identified potential impact to biodiversity.</p>

	associated with the Local Wildlife Site and waterways would be expected.	
Watford Rural Parish Council	<p>Reiterates the flood risks as set out in the Potential Sites Document.</p> <p>States that the land is used by the local water authority as a water collection point which feeds into aquifers.</p> <p>Concern about increase in congestion.</p>	<p>Noted. Flooding issues have been identified through the SFRA Level 1 study. The site will be subject to a Level 2 SFRA which will provide more detail about the flooding issues and suggest any mitigation measures where appropriate. 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>Water Authority to confirm whether this is the case and if so to set out what the implications are. Information to be considered in the assessment of sites going forward.</p> <p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (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>
PCS16 VIVIAN GARDENS		
Organisation	Comments	Officer Comments/Actions
Watford Rural Parish Council	<p>Mentions a planning application that was refused.</p> <p>Concern that the narrow access is unsuitable for any form of large construction at the end of the cul-de-sac.</p>	Noted. Any development of the site will consider design, access and other issues such as Tree Preservation Orders.
CROXLEY GREEN		
CFS20 LAND AT CROXLEY STATION – No comments		
CFS21 LAND AT ROUSEBARN LANE, LITTLE GREEN LANE		
Organisation	Comments	Officer Comments/Actions
Watford Borough Council	Extending into the Green Belt, any proposed development on this site should include an extensive landscaping scheme to protect biodiversity. Most particularly, the impact of lighting and the increased number of people that would travel through Whippendell Woods to access Cassiobury Park and the Watford town centre. In this context, funds raised through the development could be used to help deliver shared use routes for	Consideration to all these issues will be taken forward in relation to the assessment of this site.

	pedestrian and cyclists to make the development acceptable in planning terms, prepared in discussions with the providers of green infrastructure and its management would be encouraged. This would help mitigate the impact of additional traffic along Rickmansworth Road into Watford whilst benefiting the wider community. Community facilities such as a school and associated playing fields facilitated through the delivery of new housing would help meet the education needs of both Watford and Three Rivers District Council in this area whilst reducing the impact on the Green Belt.	
CFS61 CINNAMOND HOUSE, CASSIOBRIDGE		
Organisation	Comments	Officer Comments/Actions
Watford Borough Council	<p>The site is located in an area with contrasting characters, one of environmental and recreational value and the other a busy road. Significant development has come forward near Ascot Road and Whippendell Road roundabouts with extant planning permissions for high density residential development along Ascot Road. The proposed mixed use on the site could support small business, start-ups and flexible work space which could benefit from the variety of economic activities located on Watford and Croxley Business Parks.</p> <p>Any development proposals should be expected to consider the potential impact on the waterway and land on the opposite side of Watford Road which could support biodiversity.</p>	<p>Suggestion of mixed use for start-up businesses noted.</p> <p>Noted.</p>
CFS70 EXTENSION TO CROXLEY GREEN BUSINESS PARK – No Comments		
PCS49 LITTLE GREEN PLAYING FIELDS – No Comments		
PCS51 COCKAYGNE, LOUDWATER LANE – No Comments		
CFS19 LAND ADJACENT 62-84 & 99 – 121 SYCAMORE ROAD – No Comments		
PCS12 FORMER CROXLEY GREEN RAILWAY STATION – No Comments		
PCS14 EAST OF LINKS WAY – No Comments		
ABBOTS LANGLEY		
CFS3 LAND ADJACENT TO FORTUNES FARM, HIGH ELMS LANE – No Comments		
CFS5 LAND ADJACENT TO PARMITERS SCHOOL, HIGH ELMS LANE – No Comments		
CFS8b NOTLEY FARM, BEDMOND ROAD – No Comments		
CFS8c NOTLEY FARM, BEDMOND ROAD – No Comments		
CFS26a THE KINGS LANGLEY ESTATE		
Organisation	Comments	Officer Comments/Actions

<p>Watford Borough Council</p>	<p>Same comments for CFS26b. The site is located close to a main train line with good access to Watford and London. Concerns are raised about the additional road traffic coming into Watford along Hempstead Road. Any proposed development should have quality cycle lanes to enable cyclists to safely access Kings Langley railway station. This would encourage sustainable modes of travel and help mitigate the potential increase in traffic along Hempstead Road into Watford which already suffers congestion.</p>	<p>Suggestion noted. Sustainable transport modes will be considered and included in Infrastructure Delivery Plan as appropriate.</p>
<p>Kings Langley Parish Council</p>	<p>Concern about location near to the M25 which would result in air quality and noise issues for residents of any new housing.</p> <p>That National Planning Policy Framework 2018 (NPPF) states planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks. This proposal would put a huge residential estate across public rights of way at the west and eastern ends.</p> <p>The NPPF further states that substantial weight is given to any harm to the Green Belt unless there are ‘very special circumstances,’ but these will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case this Green Belt land should be protected ‘to prevent neighbouring towns merging into one another’ and ‘to check the unrestricted sprawl of large built-up areas’. This proposal would encourage coalescence between the historic villages of Kings Langley and Abbots Langley, thus failing ‘to preserve the setting and special character of (two) historic towns.’</p>	<p>Air quality and noise issues are a concern and these will be considered in line with national policy to include considering whether any development is consistent with any local area air quality action plans. Opportunities to mitigate impacts will be assessed.</p> <p>The protection or enhancement of any Right of Way will be considered. There is no suggestion that the Right of Way will be built on. 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 masterplanning or at the planning application stage.</p> <p>‘Very Special Circumstances’ are to be proven where there is a planning application for development in the Green Belt. It is ‘Exceptional Circumstances’ that need to be fully justified and evidenced.</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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p>

	<p>The level of additional infrastructure required would also be significant given the immediate area is devoid of transport, education and health services. For such a huge site, transport links would ‘feed into’ already overloaded trunk roads, e.g. A41, or residential streets.</p> <p>The recent consultation “Changes to planning policy and guidance including the standard method for assessing local housing need” stated “Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere.”</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p> <p>See above comments in relation to national planning policy and alteration to the Green Belt boundary.</p>
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CFS26b THE KINGS LANGLEY ESTATE

Organisation	Comments	Officer Comments/Actions
Watford Borough Council	<p>Same comments for CFS26a.</p> <p>The site is located close to a main train line with good access to Watford and London. Concerns are raised about the additional road traffic coming into Watford along Hempstead Road. Any proposed development should have quality cycle lanes to enable cyclists to safely access Kings Langley railway station. This would encourage sustainable modes of travel and help mitigate the potential increase in traffic along Hempstead Road into Watford which already suffers congestion.</p>	Suggestion noted. Sustainable transport modes will be considered and included in Infrastructure Delivery Plan as appropriate.
Kings Langley Parish Council	<p>The site is also close to the M25 which would result in air quality and noise issues for residents of any new housing. The nitrogen dioxide levels are particularly noticeable some distance from the motorway itself, particularly when there is little, if any, wind.</p> <p>Re-iterates the constraints on the site as set out in the Potential Sites document - includes some ancient woodland, two local</p>	<p>Air quality and noise issues are a concern and these will be considered in line with national policy to include considering whether any development is consistent with any local area air quality action plans. Opportunities to mitigate impacts will be assessed.</p> <p>Hertfordshire County Council Ecology Team and Historical Environment team have provided detailed comments on sites where there are protected wildlife sites and</p>

<p>wildlife sites; the Wildlife Trust has previously worked with local authorities, statutory agencies, landowners and other local partners to establish effective systems for identifying, managing and monitoring such sites. As a result, these special spaces have a huge part to play in the natural green fabric of Abbots Langley and Kings Langley and the surrounding countryside.</p> <p>The site also contains a site of historical value which the NPPF says planners should consider when considering the impact of a proposal on a historical asset, to avoid or minimise any conflict between its conservation and any aspect of the proposal.</p> <p>In addition, the NPPF states planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks. This proposal would put a huge residential estate across 3 miles of public rights of way (Hertfordshire Way).</p> <p>The NPPF further states that substantial weight is given to any harm to the Green Belt unless there are ‘very special circumstances,’ but these will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case this Green Belt land should be protected ‘to prevent neighbouring towns merging into one another’ and ‘to check the unrestricted sprawl of large built-up areas’. This proposal would encourage coalescence between the historic villages of Kings Langley, Abbots Langley and Hunton Bridge, thus failing ‘to preserve the setting and special character of historic towns.’</p> <p>Finally, the level of additional infrastructure required would also be significant given the immediate area is devoid of transport, education and health services. For huge a huge site, transport links would feed into busy residential streets already used as ‘rat runs’.</p>	<p>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.</p> <p>Agreed.</p> <p>The protection or enhancement of any Right of Way will be considered. There is no suggestion that the Right of Way will be built on. 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 at a detailed masterplanning or planning application stage.</p> <p>‘Very Special Circumstances’ are to be proven where there is a planning application for development in the Green Belt. It is ‘Exceptional Circumstances’ that need to be fully justified and evidenced.</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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), Waste facilities, local transport (traffic management, Highways improvements, bus network,</p>
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	<p>Finally, the recent consultation “Changes to planning policy and guidance including the standard method for assessing local housing need” stated “Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere.”</p>	<p>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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p> <p>See above comments in relation to national planning policy and alteration to the Green Belt boundary.</p>
CFS28 LAND AT GYPSY LANE, HUNTON BRIDGE		
Organisation	Comments	Officer Comments/Actions
Kings Langley Parish Council	<p>Concern about the increase in traffic if used for residential or safeguarded for Leavesden Studios.</p> <p>Concern that there are no local shops for a residential development</p> <p>That as the site contains Wild Life Sites</p> <p>The NPPF states that substantial weight is given to any harm to the Green Belt unless there are ‘very special circumstances,’ but these will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case this Green Belt land should be protected ‘to prevent neighbouring towns merging into one another’ and ‘to check the</p>	<p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</p> <p>Noted.</p> <p>The Wild Life Sites are situated adjacent to the eastern boundary. 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 Wildlife sites in accordance with national planning policy</p> <p>‘Very Special Circumstances’ are to be proven where there is a planning application for development in the Green Belt. It is ‘Exceptional Circumstances’ that need to be fully justified and evidenced. 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</p>

	<p>unrestricted sprawl of large built-up areas'. This proposal would encourage coalescence between the historic villages of Kings Langley and Abbots Langley, thus failing 'to preserve the setting and special character of (two) historic towns.'</p> <p>Finally, the recent consultation "Changes to planning policy and guidance including the standard method for assessing local housing need" stated "Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere.</p>	<p>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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p>
CFS65 LAND NORTH OF BUCKNALLS LANE		
Organisation	Comments	Officer Comments/Actions
HCC	Minerals and Waste and Waste Management of HCC comments both set out the operations of the strategic Waterdale Waste Transfer station and the need for a 100m buffer for any residential development.	Noted. Information will inform the site assessments and consideration of the application of a 100m buffer zone
CFS76 REAR OF 45 HARTHALL LANE		
Organisation	Comments	Officer Comments/Actions
Kings Langley Parish Council	<p>Concern about local road capacity, cumulative effect of development proposed in Toms Lane and narrow railway bridge.</p> <p>The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services.</p>	<p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p>

	<p>Whilst there is a low risk of flooding, the proximity of so much farmland and the cumulative effect of the potential level of development in Toms Lane could impact this assessment with farm and water 'run off'.</p> <p>The NPPF states that substantial weight is given to any harm to the Green Belt unless there are 'very special circumstances,' but these will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case this Green Belt land should be protected 'to assist in safeguarding the countryside from encroachment' and 'to check the unrestricted sprawl of large built-up areas'. This proposal would encourage coalescence between the historic villages of Kings Langley and Abbots Langley, thus failing 'to preserve the setting and special character of (two) historic towns.'</p> <p>Finally, the recent consultation "Changes to planning policy and guidance including the standard method for assessing local housing need" stated "Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere."</p>	<p>Cumulative effect of development is considered in the SFRA Level 1 study. Any mitigation measures can be secured by S106 agreements or identified in the Infrastructure Delivery Plan.</p> <p>Very Special Circumstances' are to be proven where there is a planning application for development in the Green Belt. It is 'Exceptional Circumstances' that need to be fully justified and evidenced.</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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p> <p>See above comments in relation to national planning policy and alteration to the Green Belt boundary.</p>
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OSPF6 LAND WEST OF LEAVESDEN AERODROME

Organisation	Comments	Officer Comments/Actions
Watford Borough Council	Site is supported to encourage future economic investment in the area	Support noted.

PCS44 GARSTON MANOR, GARSTON – No Comments

PCS60 LAND AT FURTHERFIELD

Organisation	Comments	Officer Comments/Actions
Kings Langley Parish Council	Re-states the information from the Potential Sites document re contamination.	National Planning Policy states that Local Plans should support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land; The land would be subject to investigation to ensure that it is/can

	<p>Concern that although situated closer to education and health facilities that these are oversubscribed.</p> <p>Concern that local roads are not suitable for such a large residential development.</p>	<p>be suitable for development. This will be considered as part of the site assessment process.</p> <p>Noted, The Education Authority and Health Providers will be consulted as to what infrastructure requirements there are and any shortfall will be included in the Infrastructure Delivery Plan. The facilities can be secured by site specific S106 Agreements or through CIL.</p> <p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary. Any specific issues relating to the access of the site will be identified and any mitigation measures can be secured by S106 agreement.</p>
CFS1 114-118 TOMS LANE		
Organisation	Comments	Officer Comments/Actions
Kings Langley Parish Council	<p>Concern that road access to the site would be under a narrow railway bridge</p> <p>Concern that the impact from development at the Eastern boundary as proposed by St Albans City & District Council would result in traffic funnelling through Bedmond to access trunk roads and motorways.</p> <p>The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services,</p>	<p>Noted.</p> <p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p>

	<p>Whilst there is a low risk of flooding, including surface water flooding, at this site and other sites in Toms Lane, the cumulative effect of residential development may be more serious and needs to be considered.</p> <p>The NPPF states that substantial weight is given to any harm to the Green Belt unless there are ‘very special circumstances,’ but these will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case this Green Belt land should be protected ‘to prevent neighbouring towns merging into one another’ and ‘to assist in safeguarding the countryside from encroachment’. This proposal would encourage coalescence between the historic villages of Kings Langley and Apsley/Hemel Hempstead, thus failing ‘to preserve the setting and special character of (two) historic towns.’</p> <p>In addition, there is further concern that the significant number of smaller sites which include those in and around the ‘Kings Langley’ corridor of Station Road, Toms Lane, Egg Farm Lane, Harthall Lane et al have a phasing period of 1-5 years. If all these were brought forward it is going to provide 2,500 houses.</p> <p>Recent consultation “Changes to planning policy and guidance including the standard method for assessing local housing need” stated “Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere.”</p>	<p>Cumulative effect of development is considered in the SFRA Level 1 study. Any mitigation measures can be secured by S106 agreements or identified in the Infrastructure Delivery Plan.</p> <p>Very Special Circumstances’ are to be proven where there is a planning application for development in the Green Belt. It is ‘Exceptional Circumstances’ that need to be fully justified and evidenced.</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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p> <p>Indicative phasing were included in the document but will be refined though the site assessment process. Sites will be phased to ensure a five year housing supply and to reflect the realistic delivery of the sites.</p> <p>See previous comments on Green Belt.</p>
CFS2 LAND AT THREE ACRES, TOMS LANE		
Organisation	Comments	Officer Comments/Actions
Kings Langley Parish Council	<p>Similar comments for CFS1</p> <p>Concern that road access to the site would be under a narrow railway bridge</p>	<p>Noted.</p> <p>Concerns about an increase in traffic are noted.</p>

	<p>Concern that the impact from development at the Eastern boundary as proposed by St Albans City & District Council would result in traffic funnelling through Bedmond.</p> <p>The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services,</p> <p>The NPPF states that substantial weight is given to any harm to the Green Belt unless there are ‘very special circumstances,’ but these will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case this Green Belt land should be protected ‘to prevent neighbouring towns merging into one another’ and ‘to assist in safeguarding the countryside from encroachment’. This proposal would encourage coalescence between the historic villages of Kings Langley and Apsley/Hemel Hempstead, thus failing ‘to preserve the setting and special character of (two) historic towns.’</p> <p>Whilst there is a low risk of flooding, including surface water flooding, at this site and other sites in Toms Lane, the cumulative effect of residential development may be more serious and needs to be considered.</p>	<p>The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p> <p>Very Special Circumstances’ are to be proven where there is a planning application for development in the Green Belt. It is ‘Exceptional Circumstances’ that need to be fully justified and evidenced.</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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p> <p>Cumulative effect of development is considered in the SFRA Level 1 study. Any mitigation measures can be secured by S106 agreements or identified in the Infrastructure Delivery Plan.</p>
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	Recent consultation “Changes to planning policy and guidance including the standard method for assessing local housing need” stated “Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere.”	See previous comments on Green Belt above.
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CFS4 LAND AT WARREN COURT, WOODSIDE ROAD – No Comments

CFS6 MANSION HOUSE EQUESTRIAN CENTRE – No Comments

CFS7 SOUTH OF TOMS LANE, NORTH OF ABBOTS LANGLEY

Organisation	Comments	Officer Comments/Actions
Kings Langley Parish Council	<p>The site is also close to the M25 which would result in air quality and noise issues for residents of any new housing. The nitrogen dioxide levels are particularly noticeable some distance from the motorway itself, particularly when there is little, if any, wind.</p> <p>Concern that the impact from development at the Eastern boundary as proposed by St Albans City & District Council would result in traffic funnelling through Bedmond.</p> <p>The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services.</p> <p>The NPPF states that substantial weight is given to any harm to the Green Belt unless there are ‘very special circumstances,’ but these will not exist unless the potential harm to the Green Belt</p>	<p>Air quality and noise issues are a concern and these will be considered in line with national policy to include considering whether any development is consistent with any local area air quality action plans. Opportunities to mitigate impacts will be assessed.</p> <p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p> <p>Very Special Circumstances’ are to be proven where there is a planning application for development in the Green Belt. It is ‘Exceptional Circumstances’ that need to be fully justified and evidenced. The priority is to make use of</p>

	<p>by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case this Green Belt land should be protected 'to assist in safeguarding the countryside from encroachment'. This proposal would encourage coalescence between Kings Langley and Abbots Langley, thus failing 'to preserve the setting and special character of (two) historic towns.'</p> <p>Finally, the recent consultation "Changes to planning policy and guidance including the standard method for assessing local housing need" stated "Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere."</p>	<p>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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p> <p>See comment above re approaching neighbouring authorities to accommodate need.</p>
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CFS8a NOTLEY FARM, BEDMOND ROAD – No Comments

CFS25 FOUR WINDS, OFF TOMS LANE, KINGS LANGLEY

Organisation	Comments	Officer Comments/Actions
King Langley Parish Council	<p>Concern that road access to the site would be under a narrow railway bridge</p> <p>Concern that the impact from development at the Eastern boundary as proposed by St Albans City & District Council would result in traffic funnelling through Bedmond.</p> <p>The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services,</p>	<p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p>

	<p>The NPPF states that substantial weight is given to any harm to the Green Belt unless there are ‘very special circumstances,’ but these will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case this Green Belt land should be protected ‘to assist in safeguarding the countryside from encroachment’. This proposal would encourage coalescence between Kings Langley and Abbots Langley, thus failing ‘to preserve the setting and special character of (two) historic towns.’</p> <p>Finally, the recent consultation “Changes to planning policy and guidance including the standard method for assessing local housing need” stated “Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere.”</p> <p>Concern about the cumulative effects of flooding should be considered.</p>	<p>Very Special Circumstances’ are to be proven where there is a planning application for development in the Green Belt. It is ‘Exceptional Circumstances’ that need to be fully justified and evidenced. 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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p> <p>See comment above re approaching neighbouring authorities to accommodate need.</p> <p>Cumulative effect of development is considered in the SFRA Level 1 study. Any mitigation measures can be secured by S106 agreements or identified in the Infrastructure Delivery Plan.</p>
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CFS54 LAND SOUTH OF BEDMOND – No Comments

ACFS7 LAND TO THE SOUTH EAST OF HIGH ELMS MANOR – No Comments

ACFS9a LAND OFF TOMS LANE

Organisation	Comments	Officer Comments/Actions
Kings Langley Parish Council	<p>Concern that road access to the site would be under a narrow railway bridge</p> <p>Concern that the impact from development at the Eastern boundary as proposed by St Albans City & District Council would result in traffic funnelling through Bedmond.</p> <p>The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services,</p>	<p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), Waste facilities, local transport (traffic management, Highways improvements, bus network,</p>

	<p>Concern about the cumulative effects of flooding should be considered.</p> <p>Sates that there is a mix of brownfield and green field land in the Green Belt.</p>	<p>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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p> <p>Cumulative effect of development is considered in the SFRA Level 1 study. Any mitigation measures can be secured by S106 agreements or identified in the Infrastructure Delivery Plan.</p> <p>Noted.</p>
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ACFS9b LAND OFF LITTLE HOW CROFT – No Comments

ACFS9c EGG FARM LANE

Organisation	Comments	Officer Comments/Actions
Kings Langley Parish Council	<p>Concern that road access to the site would be under a narrow railway bridge</p> <p>Concern that the impact from development at the Eastern boundary as proposed by St Albans City & District Council would result in traffic funnelling through Bedmond.</p> <p>The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services,</p>	<p>Concerns about an increase in traffic are noted.</p> <p>The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p>

	<p>Concern about the cumulative effects of flooding should be considered.</p> <p>Sates that there is a mix of brownfield and green field land in the Green Belt.</p>	<p>Cumulative effect of development is considered in the SFRA Level 1 study. Any mitigation measures can be secured by S106 agreements or identified in the Infrastructure Delivery Plan.</p> <p>Noted.</p>
ACFS9d BEDMOND ROAD		
Organisation	Comments	Officer Comments/Actions
Kings Langley Parish Council	<p>Similar comments as CFS7</p> <p>The site is also close to the M25 which would result in air quality and noise issues for residents of any new housing. The nitrogen dioxide levels are particularly noticeable some distance from the motorway itself, particularly when there is little, if any, wind.</p> <p>Concern that the impact from development at the Eastern boundary as proposed by St Albans City & District Council would result in traffic funnelling through Bedmond.</p> <p>The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services.</p> <p>The NPPF states that Green Belt land should be protected 'to prevent neighbouring towns merging into one another' and 'to assist in safeguarding the countryside from encroachment'. This proposal would encourage coalescence between the villages of</p>	<p>Air quality and noise issues are a concern and these will be considered in line with national policy to include considering whether any development is consistent with any local area air quality action plans. Opportunities to mitigate impacts will be assessed.</p> <p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p> <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 (or can be through the provision or improvement to public transport) and to approach our neighbouring authorities to accommodate some</p>

	<p>Kings Langley and Bedmond, thus failing 'to preserve the setting and special character of (two) villages.</p> <p>Finally, the recent consultation "Changes to planning policy and guidance including the standard method for assessing local housing need" stated "Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere."</p>	<p>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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p> <p>See comment above re approaching neighbouring authorities to accommodate need.</p>
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ACFS9e LAND WEST OF BEDMOND ROAD – No Comments

ACFS9f LAND WEST OF BEDMOND ROAD AND NORTH OF SHEPPEY'S LANE – No Comments

PCS19 ABBOTS LANGLEY MEN'S CLUB – No Comments

PCS21 LAND AT LOVE LANE – No Comments

PCS34 20 HILLTOP ROAD, KINGS LANGLEY

Organisation	Comments	Officer Comments/Actions	
Kings Langley Parish Council	<p>Same as for PCS52</p> <p>Concern that road access to the site would be under a narrow railway bridge .Concern that the impact from development at the Eastern boundary as proposed by St Albans City & District Council would result in traffic funnelling through Bedmond.</p> <p>The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services,</p>	<p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p>	

	<p>The NPPF states that substantial weight is given to any harm to the Green Belt unless there are ‘very special circumstances,’ but these will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case this Green Belt land should be protected ‘to assist in safeguarding the countryside from encroachment’. This proposal would encourage coalescence between Kings Langley and Abbots Langley, thus failing ‘to preserve the setting and special character of (two) historic towns.’</p> <p>Finally, the recent consultation “Changes to planning policy and guidance including the standard method for assessing local housing need” stated “Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere.”</p> <p>Concern about the cumulative effects of flooding should be considered.</p>	<p>Very Special Circumstances’ are to be proven where there is a planning application for development in the Green Belt. It is ‘Exceptional Circumstances’ that need to be fully justified and evidenced. 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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p> <p>See comment above re approaching neighbouring authorities to accommodate need.</p> <p>Cumulative effect of development is considered in the SFRA Level 1 study. Any mitigation measures can be secured by S106 agreements or identified in the Infrastructure Delivery Plan.</p>
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PCS42 LEAVESDEN PUMPING STATION, EAST LANE – No Comments

PCS52 HILLTOP ROAD, KINGS LANGLEY

Organisation	Comments	Officer Comments/Actions
Kings Langley parish Council	<p>Same as for PCS34</p> <p>Concern that road access to the site would be under a narrow railway bridge. Concern that the impact from development at the Eastern boundary as proposed by St Albans City & District Council would result in traffic funnelling through Bedmond.</p> <p>The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services,</p>	<p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</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 (GPs, Hospitals, Dentists), Education facilities,</p>

	<p>The NPPF states that substantial weight is given to any harm to the Green Belt unless there are ‘very special circumstances,’ but these will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case this Green Belt land should be protected ‘to assist in safeguarding the countryside from encroachment’. This proposal would encourage coalescence between Kings Langley and Abbots Langley, thus failing ‘to preserve the setting and special character of (two) historic towns.’</p> <p>Finally, the recent consultation “Changes to planning policy and guidance including the standard method for assessing local housing need” stated “Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere.”</p> <p>Concern about the cumulative effects of flooding should be considered.</p>	<p>Emergency Services, Cultural Services (libraries and cemeteries), 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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p> <p>Very Special Circumstances’ are to be proven where there is a planning application for development in the Green Belt. It is ‘Exceptional Circumstances’ that need to be fully justified and evidenced. 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. A Green Belt Assessment will determine the extent to which land meets the Green Belt purposes as set out in the NPPF.</p> <p>See comment above re approaching neighbouring authorities to accommodate need.</p> <p>Cumulative effect of development is considered in the SFRA Level 1 study. Any mitigation measures can be secured by S106 agreements or identified in the Infrastructure Delivery Plan.</p>
PCS54 LAND AT WATERDELL, BRICKET WOOD – No Comments		
OSPF21 THE TIMBER YARD. 65 TOMS LANE		
Organisation	Comments	Officer Comments/Actions

Kings Langley Parish Council	<p>Concern that road access to the site would be under a narrow railway bridge. Concern that the impact from development at the Eastern boundary as proposed by St Albans City & District Council would result in traffic funnelling through Bedmond.</p> <p>The level of additional infrastructure required would consequently be significant given the immediate area is devoid of upgraded transport, education and health services,</p> <p>Concern about the cumulative effects of flooding should be considered.</p>	<p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Where there are deficiencies S106 Agreements and/or CIL can be used to secure new infrastructure.</p> <p>Cumulative effect of development is considered in the SFRA Level 1 study. Any mitigation measures can be secured by S106 agreements or identified in the Infrastructure Delivery Plan.</p>
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CHORLEYWOOD

CFS16 LAND AT CHORLEYWOOD STATION (Station Car Park and Adjoining Land)

Organisation	Comments	Officer Comments/Actions
Chorleywood Parish Council	The site encroaches onto Common Land owned by Chorleywood Parish Council. Permission will not be given by the Parish to build on this area.	The map in the Potential Sites document is misleading. The site put forward for consideration does not include land owned by Chorleywood Parish Council. Map amended to show Land Registry boundary of the site.

CFS18 HILL FARM, STAG LANE – No Comments

PCS4 EAST GREEN STREET

Organisation	Comments	Officer Comments/Actions
Chorleywood Parish Council	The site is within the AONB.	The Potential Sites document states that the site is within the AONB. The status of the land will be a consideration in the site assessment process.
Chiltern and South Bucks District Council	Site adjoins the boundary of Chiltern District. There is a concern with this site in terms of the need for consistency with the Part 1 Buckinghamshire Green Belt assessment. TRDC was consulted about the Part 1 Assessment since its scope also included testing	Noted. The Green Belt Stage 1 Review considered Part 1 of the Buckinghamshire Green Belt Assessment that was completed in 2016. Our Green Belt Stage 1 Study shows that the land does contribute to the purposes of the Green Belt and does not contradict the findings of the Buckinghamshire assessment. A Stage 2 Green

	<p>land beyond the district boundaries as relevant to the assessment of Green Belt purposes.</p> <p>Appendix 1C of the Part 1 report contains an assessment of the land in between Little Chalfont and Chorleywood (referred to as Site 28 in the report). Site 28 includes the TRDC site PCS4.</p> <p>An extract from Appendix 1C is provided for information (can also be found on this link see pages 44 – 47 http://www.chiltern.gov.uk/media/8117/Buckinghamshire-Green-Belt-Assessment-Report-Annex-Report-1C-low-res-ARUP-March-2016-/pdf/Bucks_GB_Assessment_Report_Annex_Report_1C_FINAL_ISSUE_2016_03_07_low-res.pdf?m=635931438583000000).</p> <p>The land scores highly in terms of the prevention of merging between settlements and is also valuable in terms of other green belt functions. Therefore the assessment of site PCS4 by TRDC will need to be in accordance with the advice in Appendix 1C so as to ensure a consistent cross boundary approach between our authorities. This is of critical importance to the Chiltern and South Bucks Local Plan approach to the Green Belt and its supporting evidence.</p> <p>It is in the Chilterns AONB. Therefore site PCS4 would represent major development in the AONB, also raising concerns about the need for a consistent approach between the Councils to this area of land.</p> <p>In addition to the above overarching issues, this site will need assessing in terms of the visual impact on Chiltern District and potential impact on nearby roads and local infrastructure.</p>	<p>Belt Study will look at smaller parcels and will look again at the land in term of meeting the purposes of the Green Belt.</p> <p>Noted.</p> <p>The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), Waste facilities, local transport (traffic management, Highways improvements, bus network, cycling facilities, Green infrastructure (open spaces, parks and gardens and</p>
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		<p>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>Any mitigation measures will be included in either site specific S106 agreements and/or the Infrastructure Delivery Plan.</p> <p>Associated infrastructure will be identified in the Infrastructure Delivery Plan.</p>
OSPF3 LAND AT HERONSGATE – No Comments		
CFS15 ALABAMA & WAVERLEY, CHENIES ROAD – No Comments		
CFS17 BIRDWOOD, LAND AT HILL FARM, STAG LANE – No Comments		
CFS29 LAND AT 2 SARRATT LANE – No Comments		
CFS30 LAND REAR OF BRANKSOME LODGE – No Comments		
CFS57 PHEASANTS RIDGE GAP, BERRY LANE – No Comments		
CFS72 SOLESBRIDGE LANE – No Comments		
ACFS1 HEATH HOUSE, RICKMANSWORTH ROAD – No Comments		
ACFS5 POND FIELD, HALL FARM, WEST CLAYTON – No Comments		
ACFS6 HOME FIELD, BERRY LANE – No Comments		
PCS6 HALL FARM, BERRY LANE – No Comments		
PCS7 HALL FARM, SHEPHERDS LANE – No Comments		
MILL END		
CFS37 LAND AT LONG LANE – No Comments		
CFS38a LAND REAR OF COLNE MEAD – No Comments		
CFS73 LAND AT 319 & 321 UXBRIDGE ROAD – No Comments		
PCS59LAND AT BERRY LANE – No Comments		
CFS38b LAND AT WATERSIDE – No Comments		
MAPLE CROSS		
CFS32 LAND AT LYNSTERS FARM, EAST OF OLD UXBRIDGE ROAD		
Organisation	Comments	Officer Comments/Actions
Thames Water	In relation to two sites at Maple Cross (site reference CFS32 and CFS33), parts of these sites lie in close proximity to Maple Lodge Sewage Treatment Works (STW) and as a result the impact of odour on the sites will need to be a key consideration to ensure that any developments and/or uses would be appropriate taking into account the amenity of any future occupiers. Consideration	Noted. Consideration of this and national planning policy will be considered as part of the site assessment process.

	would need to be given to the requirement for any mitigation works and how these would be delivered in order to ensure that any development of these sites would be acceptable in terms of odour exposure.	
CFS33 LAND AT MAPLE CROSS, MAPLE LODGE		
Organisation	Comments	Officer Comments/Actions
Thames Water	<p>In relation to two sites at Maple Cross (site reference CFS32 and CFS33), parts of these sites lie in close proximity to Maple Lodge Sewage Treatment Works (STW) and as a result the impact of odour on the sites will need to be a key consideration to ensure that any developments and/or uses would be appropriate taking into account the amenity of any future occupiers. Consideration would need to be given to the requirement for any mitigation works and how these would be delivered in order to ensure that any development of these sites would be acceptable in terms of odour exposure.</p> <p>In relation to the site CFS33 for Land at Maple Cross, this site also includes a cricket pitch close to the entrance to Maple Lodge STW. This site is owned by Thames Water and has not been promoted for development and it is considered that the cricket pitch should be removed from the site area.</p>	<p>Noted. Consideration of this and national planning policy will be considered as part of the site assessment process.</p> <p>Noted. Site boundary will be amended accordingly.</p>
CFS34 LAND SOUTH OF HORNHILL ROAD AND WOODLAND ROAD – No Comments		
CFS34a LAND SOUTH OF HORNHILL ROAD AND WOODLAND ROAD LARGER SITE – No Comments		
CFS36 LAND AT JUNCTION 17 of M25		
Organisation	Comments	Officer Comments/Actions
Kings Langley Parish Council	If additional services are required on the M25 they would arguably be better placed between Junctions 16 and 17 where a great deal of groundworks have already been completed for HS2 which could be used for the Motorway Service Area site once the works are completed.	Noted. Work on the HS2 will take a number of years and the land has not been put forward for consideration. In any event there are already plans for remedial measures at the HS2 construction site.
CFS64 LAND SOUTH OF CHALFONT LANE, WEST HYDE – No Comments		
CFS31 24 DENHAM WAY AND LAND REAR TO MAPLE CROSS – No Comments		
CFS35b MAPLE LODGE DEPOT AND ADJACENT CAR PARK, MAPLE LODGE CLOSE – No Comments		
PCS11 WEST HYDERESIDENTIAL CENTRE, WEST HYDE – No Comments		
KINGS LANGLEY		
CFS23 LANGLEYBURY		

Organisation	Comments	Officer Comments/Actions
Kings Langley Parish Council	<p>Concern about the condition of the Grade 11 Listed Building</p> <p>Concern about increase in traffic considering potential motorway services development.</p> <p>States that apart from the local primary school there are no education facilities, transport or health facilities near the site.</p> <p>States that development here would “a greater impact on the openness of the Green Belt than the existing development” and therefore be contrary to NPPF guidelines. The NPPF also states that substantial weight is given to any harm to the Green Belt unless there are ‘very special circumstances,’ but these will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case this Green Belt land should be protected ‘to assist in safeguarding the countryside from encroachment’ and ‘to check the unrestricted sprawl of large built-up areas’.</p> <p>Finally, the recent consultation “Changes to planning policy and guidance including the standard method for assessing local housing need” stated “Local authorities may also not be able to meet their identified housing need in full, for example because of land constraints (such as Green Belt) in their area and it may be that need is better met elsewhere.”</p>	<p>The building is on the Heritage at Risk Register however, the building is being maintained and improved by the current owners.</p> <p>The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</p> <p>Noted, The Education Authority and Health Providers will be consulted as to what infrastructure requirements there are and any shortfall will be included in the Infrastructure Delivery Plan. The facilities can be secured by site specific S106 Agreements or through CIL.</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. A Green Belt Assessment will also inform the site assessment process.</p> <p>See above comment.</p>
CFS24 SOUTH WEST of JUNCTON 20 of M25		
Organisation	Comments	Officer Comments/Actions
Watford Borough Council	<p>The site encroaches into the Green Belt and is contrary to the objectives set out in the National Planning Policy Framework. While there is a strategic road corridor adjacent the site,</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</p>

	<p>development would further extend the influence of the built up area and act to reduce the separation between settlements in the wider area including Kings Langley, Abbots Langley and Watford. Motorway services support the road network, however, provision for retail is considered to be inappropriate with other retail centres providing access to services and facilities located elsewhere in the vicinity.</p>	<p>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. A Green Belt Assessment will also inform the site assessment process.</p> <p>With regards to retail the proposal is for a motorway service station which will contain retail facilities for users.</p>
Kings Langley Parish Council	<p>Concern that there are 2 sites put forward for motorway services. Comments on the proposals by MOTO at Jt 20. Propose that services more suited between Jt 16 & 17 of the M25 due to works already being undertaken by HS2.</p> <p>Concern about the impact on the openness of the Green Belt and that 'Very special circumstances' need to be proven.</p> <p>Concern about air quality and noise issues of the proposal. Concern about the increase in traffic and congestion through A41/M25 corridors due to development in Dacorum, Three Rivers, St Albans and Watford.</p> <p>Concern that the MOTO services would cause congestion through Kings Langley, Apsley, Hemel Hempstead, Hunton Bridge and Abbots Langley. Many local roads are single or two lane, some have height and width restricted bridge.</p>	<p>Noted.</p> <p>'Very special circumstances' do need to be proven where there is an application for development in the Green Belt but not for altering the Green Belt boundary to allocate sites for development through the Local Plan process. In this instance, 'Exceptional Circumstances' need to be proven as set out in national planning policy.</p> <p>Air quality and noise issues are a concern and these will be considered in line with national policy to include considering whether any development is consistent with any local area air quality action plans. Opportunities to mitigate impacts will be assessed. Any mitigation measures will be included in either site specific S106 agreements and/or the Infrastructure Delivery Plan.</p> <p>The Highways Authority will undertake a traffic assessment (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>
CFS55 LAND AT STATION ROAD		
Organisation	Comments	Officer Comments/Actions

Watford Borough Council	<p>Development would reduce the separation between Kings Langley and Abbots Langley reducing their sense of individual character and increasing the sense of human influence in the area, particularly extending north wards from Watford.</p> <p>The site would provide low density employment opportunities to support the local economy. Consideration will need to be given to the benefits of such development and how this would compromise the character of the two settlements in the long term.</p>	<p>Noted. This could be addressed through careful design and layout of any proposals.</p> <p>Consideration will be given to this.</p>
Kings Langley Parish Council	<p>Concern about the impact on local roads.</p> <p>Concern about major employment development given the proximity to the M25 (air and noise pollution), the flood plain, signifying a high risk of flooding and surface water flooding, the Grand Union Canal (a local wildlife site) is to the west and the only vehicular access is via Station Road close to the existing traffic lights at the single lane railway bridge.</p>	<p>The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</p> <p>Noted. All these issues will be looked at through the site assessment process and relevant evidence base studies such as SFRA.</p>
CFS71 LAND REAR OF THE KINGS HEAD, HUNTON BRIDGE		
Organisation	Comments	Officer Comments/Actions
Kings Langley Parish Council	<p>Concern that residential development would increase demand on the A41.</p> <p>Concern about the lack of education or health services.</p> <p>Concern that there are Wildlife sites adjacent to the site.</p> <p>Site is at risk for flooding and concerned about the cumulative effects on this by nearby development.</p>	<p>The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</p> <p>Noted, The Education Authority and Health Providers will be consulted as to what infrastructure requirements there are and any shortfall will be included in the Infrastructure Delivery Plan. The facilities can be secured by site specific S106 Agreements or through CIL.</p> <p>Any development proposals would have to take account of the effect on the wild life site in line with national planning policy.</p> <p>Flooding issues have been identified through the SFRA Level 1 study. The site will be subject to a Level 2 SFRA which will provide more detail about the flooding issues and suggest any mitigation measures where appropriate.</p>

	Concern about the demolition of the nationally listed King's Head	The potential site includes land to the rear of the historic building and there is no suggestion that the nationally important building will be demolished.	
ACFS8b FLOWER HOUSE, 2-3 STATION ROAD			
Organisation	Comments	Officer Comments	Actions
Kings Langley Parish Council	<p>Concern about the proximity to the M25 (air and noise pollution), the flood plain, signifying a high risk of flooding and surface water flooding, the Grand Union Canal (a local wildlife site) is to the west and the only vehicular access via Station Road close to the existing traffic lights at the single lane railway bridge and pedestrian lights.</p> <p>There are little or no educational or health services and – apart from the railway station - insufficient transport services in the area.</p>	<p>The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary.</p> <p>Flooding issues have been identified through the SFRA Level 1 study. The site will be subject to a Level 2 SFRA which will provide more detail about the flooding issues and suggest any mitigation measures where appropriate.</p> <p>Any development proposals would have to take account of the effect on the wild life site in line with national planning policy.</p> <p>The Education Authority and Health Providers will be consulted as to what infrastructure requirements there are and any shortfall will be included in the Infrastructure Delivery Plan. The facilities can be secured by site specific S106 Agreements or through CIL.</p>	
PCS36 LAND OPPOSITE ALPINE PRESS			
Organisation	Comments	Officer Comments/Actions	
Kings Langley Parish Council	<p>Concern about the cumulative effects of development of nearby sites and this one in relation to the road network</p> <p>In addition, the proximity to the M25 (air and noise pollution), the flood plain, signifying a high risk of flooding and surface water flooding, the Grand Union Canal (a local wildlife site) is to the west and the only vehicular access via Station Road.</p> <p>There are little or no educational or health services and – apart from the railway station - insufficient transport services in the area for further residential development.</p>	<p>The Education Authority and Health Providers will be consulted as to what infrastructure requirements there are and any shortfall will be included in the Infrastructure Delivery Plan. The facilities can be secured by site specific S106 Agreements or through CIL.</p> <p>Any development proposals would have to take account of the effect on the wild life site in line with national planning policy.</p> <p>Flooding issues have been identified through the SFRA Level 1 study. The site will be subject to a Level 2 SFRA which will provide more detail about the flooding issues and suggest any mitigation measures where appropriate.</p>	
MOOR PARK AND EASTBURY			
CFS39a LAND SOUTH OF TOLPITS LANE			

Organisation	Comments	Officer Comments/Actions
Watford Borough Council	<p>A short distance to the north is the Watford and Croxley Business Parks. Between the two is the Ebury Way which provides a pedestrian and cycle route between Watford (Oxhey) and Rickmansworth. The route also connects to an off-road cycle route to the Holywell Estate and large supermarket along with community facilities including a primary school, community centre and playing fields. If development is considered further on this site, a quality shared use path for cyclists and pedestrians should be considered to connect the development to Ebury Way and Holywell.</p>	<p>Consideration can be given to a quality shared use path for cyclists and pedestrians.</p>
Batchworth Community Council	<p>Object to the development of this site: The site is in the Green Belt and represents an unbroken area of distinctive open land on the southern side of Tolpits Lane. To promote the development of land along this stretch of Green Belt, and thereby create substantial development on both sides of Tolpits Lane, would fundamentally and unacceptably alter the character of Three Rivers District when traveling west along Tolpits Lane out of the built up part of Watford Borough.</p> <p>In addition, it has: -</p> <ul style="list-style-type: none"> • some high risk flooding potential • preserved trees on site • a Local Wildlife Site designation • poor infrastructure in terms of footways/pavement access. 	<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. A Green Belt Assessment will also inform the site assessment process.</p> <p>The SFRA Level 1 and Level 2 studies assess the risk of flooding from all sources and are informed by HCC and other relevant stakeholders such as the Environment Agency.</p> <p>TPO’s and Local Wild Life Site on the site will be considered as part of the site assessment process. Any development would need to take these into account in line with national planning policy.</p> <p>The provision of footways/pathways within the site can be provided by the development and issues regarding lack of footpaths outside of the site will also be considered and informed by Hertfordshire County Council as the Highways Authority. Any improvements/provision of pathways can be secured either by site specific S106 Agreements and/or through the Infrastructure Delivery Plan.</p>

	<p>We consider that the site is a strategic part of the designated Green Belt in this area of the District. It fulfils the fundamental aim of such designations by preventing/limiting development “sprawl” to the east of the built-up part of Moor Park and satisfies the essential characteristic of Green Belts, which is to maintain openness. Further it achieves three of the five stated purposes of the Green Belt, as defined in the National Planning Policy Framework.</p>	<p>See above comments on Green Belt.</p>
<p>CFS39b LAND TO EAST OF MERCHANT TAYLORS SCHOOL</p>		
Organisation	Comments	Officer Comments/Actions
<p>Batchworth Community Council</p>	<p>There are no soundly based grounds or planning justifications for the wholesale release of this 9.2ha site from the Green Belt, even for educational purposes.</p> <p>We consider that the site is a strategic part of the designated Green Belt in this area of the District. It fulfils the fundamental aim of such designations by preventing/limiting development “sprawl” to the east of the built-up part of Moor Park and satisfies the essential characteristic of Green Belts, which is to maintain openness. Further it achieves three of the five stated purposes of the Green Belt, as defined in the National Planning Policy Framework.</p> <p>IF one considers the co-relationship of the land with the designated Moor Park Conservation Area. Clearly Moor Park is not a town per se, but as a designated Conservation Area, any undue development of the land to the east of the school, in our view, would undoubtedly adversely affect the setting of, and approach to, the Conservation Area.</p> <p>Nevertheless, we would not wish to completely rule out some future limited expansion of the school buildings into the land identified in the local plan consultation. However, we consider this should only be contemplated on the basis of:-</p> <ul style="list-style-type: none"> retaining the Green Belt designation in full 	<p>The need for education facilities will be informed by Hertfordshire County Council as the Education Authority. Whilst the proposed school is private and attracts students from outside of the District any expansion could still relieve pressure on schools within the area.</p> <p>A Green Belt Assessment will be undertaken to establish the degree to which sites achieve the five purposes of the Green Belt and will inform the site assessment process. Where there are ‘Exceptional Circumstance’ that are fully justified and evidenced the Green Belt boundary can be altered in line with the National Planning Policy Framework.</p> <p>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 don’t through careful design and meeting the requirements of the National planning policy framework.</p> <p>Support for limited expansion of the school noted.</p> <p>National planning policy does not allow for this.</p>

	<ul style="list-style-type: none"> thereby considering future schemes only against the backdrop of current national and local Green Belt policy (i.e. only being permitted on the basis of “very special circumstances” and, essentially, establishing a planned, long term pattern of growth for the school that is commensurate with a sensible and sustainable move towards reducing traffic flows, car parking and car dependency over time. 	<p>‘Very special circumstances’ applies to planning applications not plan making. If land is identified as being needed for development (whatever that may be) then the Green Belt designation has to be removed as part of Local Plan process.</p> <p>Traffic implications will be considered as part of the site assessment process and informed by Hertfordshire Highways. Any mitigation measures can be secured by site specific S106 and/or included in the Infrastructure Delivery Plan. Schools are required to produce Travel Plans to address some of these issues.</p>
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PCS50 THE ROUGHS, EASTBURY

Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	<p>Oppose the allocation of this site.</p> <p>Proposed excessively high density 110 – 145 dph on this Green Belt land and with its Tree Preservation Order in place, is totally out of character with the area and therefore, in our opinion, is totally unacceptable.</p> <p>In our opinion, until a more realistic assessment is made of the land and the full effect of retaining all of the high-quality trees on this Green Belt site is taken into account, no further plans or proposals should be considered for the site. Please be advised that we will continue to raise our strong objections on these grounds until these minimum requirements are satisfied in full.</p> <p>Concerns about traffic generation on the local road network when considering other sites in the vicinity including: - (i)The Roughts (110 – 145 dwellings) (ii)The school expansion plans at Merchant Taylors (site ref CFS 39B) (iii)The land at Hampermill Lane (15 – 25 dwellings) (site ref ACFS 13) (iv)The land at Knoll Oak (25 – 30 dwellings) (site ref CFS 22) (v)The land north of Oxhey Hall Farm (275 – 415 dwellings) (site ref CFS 67), In view of this we would commend that the Council commits to an independent, wide ranging traffic/transportation impact assessment to assess, inter alia, road capacity, potential delays,</p>	<p>Noted.</p> <p>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. That being said the densities quoted in the Potential Sites document are indicative and will be refined through the site assessment process.</p> <p>Consideration of the TPOs on the site will be taken into account through the site assessment process. Any planning application that is submitted for the site will have to be considered in line with current policies.</p> <p>Concerns about an increase in traffic are noted. The Highways Authority will undertake a traffic assessment (COMET) to identify areas where there are likely to be issues with congestion. They will also suggest any mitigation measures where necessary. These can be secured either by site specific S106 Agreements and/or through the Infrastructure Delivery Plan.</p>

	<p>overloaded junctions at peak times, anticipated queueing distances and general predicted traffic conditions etc BEFORE any of the above sites are progressed within this consultation exercise.</p> <p>We are advised that the Council’s initial “comments” referring to “low risk of flooding” is potentially out of date and thereby misleading. There is local evidence of increasing flooding in the local vicinity and substantial issues associated with surface water run-off, especially along Sandy Lane in the vicinity of The Roughs (and subsequently down/across Hampermill Lane). We would submit that a more thorough investigation by the Council will be required of these matters before any more progress is made in promoting this site for development.</p> <p>We are advised that a large “sink hole” appeared recently in Westbury Road that may indicated instability of land on, or in the vicinity of, The Roughs. We believe such an issue needs to be fully investigated by the Council or landowners to clearly ascertain if it has any bearing on the future development, or otherwise, of The Roughs.</p> <p>Finally, we are advised that a live/valid legal covenant exists on this site that will preclude its development.</p>	<p>They are not out of date. The Level 1 SFRA did not identify this site as being at risk from surface water flooding.</p> <p>It is possible for new developments to contribute to mitigation measures where there are issues of surface water flooding in the vicinity of the site if it is shown that the development would have an impact on the risk of flooding.</p> <p>We are unaware of any sink hole in Westbury Road. National planning policy requires that sites are suitable for its proposed use taking account of any risks arising from land instability and proposals for mitigating those risks. Consideration will be given to this issues through eh site assessment process .The responsibility for securing a safe development rests with the developer and/or land owner. Contact HCC Highways to determine whether they were aware of any sink hole and, if so, its location. If necessary further information will be sought from the landowner regarding stability of the land and will inform the site assessment process.</p> <p>There is covenant but it does not restrict development of the site, instead it sets out that development of the site should be detached or semi-detached properties. Covenants can be changed and are not a material consideration in the determination of planning applications. That said we do have to be reasonably satisfied that development can be achieved within a 15 year period.</p>
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CFS22 KNOLL OAK, SANDY LANE, NORTHWOOD

Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	Consider the proposed excessively high density (approx 24 dwellings per acre at worst case from the figures in the consultation document) on this part-Green Belt, well screened site and with its Tree Preservation Order, is totally out of keeping with the low density character of the area and therefore, in our opinion, is totally unacceptable at this juncture.	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. That being said the densities quoted in the Potential Sites document are indicative and will be refined through the site assessment process.

	<p>Do not consider that this very small parcel of Green Belt (at the north end of the consultation site) is strategically located and hence we could contemplate its removal from the Green Belt as part of the wider consultation exercise. However, we would stress the following clear caveats to our response on the Green Belt aspect of this site would be:-</p> <ul style="list-style-type: none"> • that the larger/more extensive area of Green Belt designation to the north of the site (shown as Oxhey Woods in the consultation docs) must be robustly protected and must not be put in jeopardy at any stage • the well treed frontage of the site should be retained • all top quality protected trees on the site that are covered by the TPO should be accurately surveyed and thereafter agreed for long term protection and retention • any development must be designed as entirely sympathetic and of high standards of materials and finishes; commensurate with the surroundings of the site • the site access appears potentially hazardous in terms of its limited sightlines. We believe this aspect, and the presumption in favour of the retention of trees, should be the overriding limiting factor in dictating the scale of potential future development envisaged for this site, as opposed to an engineering solution that would typically lead to widescale tree removal along the site frontage to “create” the required sightlines. In other words, character of the area, tree retention and protection of the well landscaped frontage along Sandy Lane must come before housing numbers, resultant excessive levels of development and resultant irreparable damage to the environment /amenities of the area. 	<p>Oxhey Woods is not proposed for development and is protected in any event.</p> <p>Issues relating to the retention of trees at the frontage of the site, design of development etc. are not a consideration for the allocation of the land but will be considered as part of the planning application process (or masterplanning process on larger sites) where development proposals will need to adhere to the relevant national and local planning policies.</p>
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CFS39c SANDY LODGE LANE AND LAND AT ASKEW ROAD – No Comments

ACFS13 LAND AT HAMPERMILL LANE

Organisation	Comments	Officer Comments/Actions
Batchworth Community Council	The site is in the Green Belt and comprises an unbroken area of distinctive “open land” on the southern side of Hampermill Lane and is the only space between (a) the last residential property	A Green Belt Assessment will be undertaken to establish the degree to which sites achieve the five purposes of the Green Belt and will inform the site assessment process. The Green Belt boundary will only be altered to accommodate

<p>that flows around the linear curve of residential properties around the bend at the bottom of Hampermill Lane/hill (to the west) and (b) the first of the linear properties on the edge of Oxhey Hall (to the east). As a result, we consider this to be a strategic Green Belt site that fulfils the fundamental aim of such designations by preventing/limiting development “sprawl” between the two linear strands of housing referred above and satisfies the essential characteristic of Green Belts, which is to maintain openness. Further it achieves three of the five stated purposes of the Green Belt, as defined in the National Planning Policy Framework. In addition, the site must be read in the context of the equally open character of the Green Belt on the opposite of Hampermill Lane and the relatively steeply sloping nature of the site itself; the development of which would unquestionably tower over the road at its lower level and prevent all sense of openness in the immediate vicinity. In this short section of highway the impression is one of open land and, having left the urban character of the western edge of Oxhey Hall (and Bushey Arches etc.), the character of the proposed site, combined with the character of the open Green Belt land on the opposite of the road, serves to create and reinforce this first sense of openness. Consequently, in light of all of the above factors, we would strongly oppose its inclusion as a site of future residential development.</p>	<p>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. A Green Belt Assessment will also inform the site assessment process.</p>
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BEDMOND
CFS75 BEDMOND FIELDS – No Comments
PCS24 BLUEBELL DRIVE (LARGER SITE) – No Comments
PCS46 TWYCHELLS FARM – No Comments
CFS9 LAND AT MILLHOUSE LANE – No Comments
CFS10 LAND BETWEEN MILLHOUSE LANE AND BELL LANE – No Comments
CFS56 CHURCH HILL ROAD – No Comments
CFS63 THE ORCHARD LAND ADJACENT, BEDMOND ROAD – No Comments
PCS25 EAST LANE (PARCEL1) – No Comments
PCS26 EAST LANE (PARCEL 2) – No Comments
PCS27 EAST LANE (PARCEL 3) – No Comments
PCS29 EAST LANE (PARCEL 5) – No Comments
PCS30 EAST LANE (PARCEL 6) – No Comments

PCS33 BLUEBELL DRIVE (SMALLER SITE) – No Comments
PCS61 LAND AT BLUEBELL DRIVE/TOMS LANE – No Comments
OSPF2 LAND AT BELL LANE – No Comments
SARRATT AND CHIPPERFIELD
CFS48 LAND AT HOLLY TREE FARM, SARRATT – No Comments
CFS46 LAND AT THE BOOT, SARRATT – No Comments
CFS47a LAND SOUTH OF DOWNER DRIVE, SARRATT – No Comments
CFS47b BROSSELL FARM, CHURCH LANE, SARRATT – No Comments
CFS47c ADAMS NURSERIES, CHURCH LANE, SARRATT – No Comments
CFS49LAND TO WEST O SARRATT ROAD – No Comments
CFS50 OAK TREE HOUSE, SARRATT – No Comments
CFS51 LAND REAR OF GREAT WINCH OFF DUNNY LANE, CHIPPERFIELD – No Comments
CFS58 LAND NORTH WEST OF CHURCH LANE, SARRATT – No Comments
ACFS4b LAND AT FIR TREE HILL, CHANDLERS CROSS (OPTION B) – No Comments
ACFS4c LAND AT FIR TREE HILL, CHANDLERS CROSS (OPTION C) – No Comments
ACFS4d LANDADJACENT TO COUNTY PLACE, FIR TREE HILL, CHANDLERS CROSS – No Comments
ACFS12 LAND REAR OF FIR TREES, DAWES LANE, SARRATT – No Comments

GENERAL COMMENTS		
Organisation	Comments	Officer Comments/Actions
Environment Agency	Detailed comments on all the sites listed in the Potential Sites document provided together with recommendations of any further investigations or evidence base studies required.	TRDC asked the environment Agency to provide detailed comments on each site which will be used in the site assessment process and inform of any further studies/investigations.
Natural England	Have provided guidance on the following as to how they are assessed in the site assessment process: Landscape	Guidance welcomed.

	<ul style="list-style-type: none"> • Avoiding harm to the character of nationally protected landscapes - National Parks, the Broads and Areas of Outstanding Natural Beauty - and locally valued landscapes <p>Biodiversity</p> <ul style="list-style-type: none"> • Avoiding harm to the international, national and locally designated sites of importance for biodiversity. • Avoiding harm to priority habitats, ecological networks and priority and/or legally protected species populations • Seeking opportunities to contribute to the restoration and re-creation of habitats, the recovery of priority species populations and biodiversity enhancement • Seeking opportunities to enhance and create Green Infrastructure <p>Geological conservation</p> <ul style="list-style-type: none"> • Avoid harm to nationally and locally designated sites of importance for geological conservation - geological SSSIs and Local Geological Sites (also known as RIGS - Regionally Important Geological Sites) • Seeking opportunities to contribute to landscape restoration and enhancement. <p>Best and Most Versatile Agricultural Land</p> <ul style="list-style-type: none"> • Avoiding Best and Most Versatile Agricultural Land <p>Public rights of way and access</p> <ul style="list-style-type: none"> • Seeking opportunities to enhance public rights of way and accessible natural green space. 	<p>Information and guidance will be used in the site assessments and/or evidence base studies to support the content of the Local plan.</p>
Historic England	<p>Have provided guidance on how the historic environment might be most effectively assessed as part of the site assessment process.</p>	<p>The guidance is welcomed. The guidance will be used in the site assessment process as advised by Historic England.</p>
Thames Water	<p>Provides comments on specific sites and the following information: For your information since the 1st April 2018 all off site wastewater network reinforcement works necessary as a result</p>	<p>Site specific comments are listed against the sites. CF32, CFS33 Noted. Further meeting with Thames Water to be arranged to discuss</p>

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.

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 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.

In order to ensure that such conditions can be applied and to make it clear that there is a need for wastewater infrastructure to be aligned with growth it is requested that the following policy and supporting text is included in the new Local Plan.

Proposed Policy:

Where appropriate planning permission for developments which result in the need for off-site upgrades will be subject to conditions to ensure the occupation does not outpace the delivery of necessary infrastructure upgrades.

Proposed supporting text:

The Local Planning Authority will seek to ensure that there is adequate wastewater infrastructure to serve all new developments. Developers are encouraged to contact Thames Water as early as possible to discuss their development proposals and intended delivery programme to assist with

Propose policy wording and supporting text will be considered for inclusion in the Local Plan.

	<p>identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.</p>	
Sarratt Parish Council	<p>No comments on individual sites. Advised that a recent Parish Plan consultation showed that 46% of respondents thought more housing was needed and a general preference for a mix of housing – particularly affordable houses and flats reflecting the desire to help the young and old stay in the Parish. 70% of respondents didn't see a need for larger homes (4+ beds). Preference for brownfield land and infill sites.</p>	Noted.
Watford Borough Council	<p>Provide comments on specific sites and the following comments:</p> <p>Approach to growth</p> <p>Whichever approach to development is taken as part of a growth strategy, Watford would like to highlight the benefits of scale when bringing development forward compared to bringing forward development on small sites in a more dispersed pattern of growth which could reduce the potential for attracting investment that could benefit the respective settlement and wider area.</p> <p>Watford will await the outcomes of the consultation and how the council progresses sites to be part of an overall growth strategy for the borough that will also contribute towards growth in the wider SW Herts area.</p> <p>Cross boundary issues</p> <p>The supporting text to the sites could provide more information about existing services and facilities located in the area but outside of the Three Rivers District Council administrative boundaries. This would help demonstrate the opportunities, suitability and limitations of a site and recognise that administrative boundaries are not a defining feature in how</p>	<p>Comments on specific sites are contained in the site comment sections.</p> <p>Noted</p> <p>Consideration of existing services will be given as we progress with the site assessment process and we acknowledge that administrative boundaries are not a defining feature. Evidence base studies such as the Retail and Leisure Study, Open Space sport & Recreation studies demonstrate this.</p>

	<p>people use services and facilities in the wider area around them. It is hoped this will be given further consideration as the Local Plan is progressed.</p> <p>Watford is highly unlikely to accommodate the growth needed to meet the housing targets derived using the Government’s standardised methodology. Watford has a limited amount of land available for new development and redevelopment. This is the primary constraints facing the borough as it makes progress on its respective new Local Plan.</p> <p>The National Planning Policy Framework (para. 61) states that “any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for”. Watford would welcome continued discussions related to cross boundary issues such as housing and infrastructure provision as the respective local plans are progressed</p> <p>Local infrastructure needs Watford will be looking to make best use of land as part of its new Local Plan. However, the shortfall of land available for new development means that uses will need to be prioritised. New schools are an integral part of new residential development and the community. Watford will not have enough land available to provide new education facilities required to meet the needs of its growing population. In this context, Watford will welcome continued discussions with Hertsmere Borough Council and Hertfordshire County Council, as the education authority, on how some of the infrastructure needs generated by growth in Watford can be delivered more strategically with neighbouring boroughs.</p>	<p>Noted. TRDC has a limited amount of urban and brownfield land to accommodate the housing targets and are in a similar situation to Watford and other SW Herts LPAs.</p> <p>See above comment. TRDC will continue discussions with WBC on cross boundary issues.</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>Noted</p>
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	<p>If new schools are to be delivered to support population growth and some Watford children are to attend these schools along with Hertsmere residents, consideration should be given to the most appropriate sites used for this type of provision, particularly with regard to accessibility. In this manner, Watford would support the provision of new education facilities close to the shared boundary with Three Rivers District Council such as site CFS53 and PCS14 (extant planning permission).</p> <p>To improve accessibility, consideration of quality walking, cycling and bus routes would be supported providing better connections between residential areas and key destinations in both Watford and Hertsmere.</p> <p>For the long term, it will be important to also keep a thought on how new infrastructure provision can benefit the area beyond 2036.</p>	<p>Support of educational facilities serving TRDC Watford and Hertsmere are noted.</p> <p>Noted. These will be given consideration and any identified facilities will be included in the Infrastructure Deliver Plan and secured by site specific S106 agreements or through CIL.</p>
Highways England	No comments on specific sites. Will be concerned with proposals that have the potential to impact on safe and efficient operation of junctions 19, 20, 21 and 21a of the M25 and junctions 6 and 6a of the M1. If any of the large sites are allocated they wish to be consulted at the pre-application stage or when applications come in to establish the potential impact on the above.	Noted
Watford Rural Parish Council	<p>General comments about the South Oxhey Initiative and satellite sites.</p> <p>Concern about lack of parking and concern that there is a lack of a secondary school schools and infrastructure as a whole.</p> <p>They state that they agree with CPRE's opinions.</p>	<p>South Oxhey Initiative is not subject to this consultation.</p> <p>Concern about parking, the need for a secondary school in the area and general infrastructure is noted. Infrastructure requirements will be considered fully through the Infrastructure Delivery Plan in consultation with infrastructure providers.</p> <p>Site CFS11 is being considered for a secondary school.</p> <p>Noted.</p>

<p>Buckinghamshire County Council</p>	<p>Transport: Consideration should be given to key cross boundary transport links between the areas and the impacts of proposals on the respective areas.</p> <p>Request that TRDC should monitor and mitigate any impacts on local and strategic roads that will result from growth in particular at sites in Rickmansworth, Croxley Green, Chorleywood, Mill End, Maple Cross and Kings Langley as some commuting trips are likely to use the M25, A41, A411, A413 and A404 and will increase pressure on these already congested routes.</p> <p>Consideration should be given to areas such as Chesham and Amersham which maybe key access points for people living in TRDC and wanting to travel to London via London Underground and Chiltern Railway services. Consider appropriate mitigation to reduce the impact of the proposed development sites on the London Underground stations of Chesham, Amersham and Chalfont and Latimer.</p> <p>Chiltern District Council have identified growth areas in Little Chalfont and will address the impact through mitigation measures through the traffic and transport modelling process. BCC keen to ensure that there are no further detrimental impacts on this road as a result of the proposals in the emerging TR Local Plan.</p> <p>Local Plan Development</p> <p>Consideration to be given on how to address the issue of HGVs using local roads instead of the strategic road network as set out in their response to the HCC's South West Herts Growth and Transport Plan in 2018.</p>	<p>HCC as the Transport Authority will be undertaking traffic and transport modelling as part of the local plan process and will look at the BCC Local Transport Plan. Consideration will be given to all issues raised. Cross boundary transport will be given consideration.</p> <p>The transports assessments will be shared with BCC to consider and further comment on.</p> <p>HCC to be asked how this issue can be addressed through the Local Plan process and/or SW Herts Transport Plan.</p> <p>Any issues will be identified through the transport assessment with mitigation measures identified. Any identified issues by the Highways Authority will be considered as part of the assessment process and any identified mitigation measures can be addressed through site specific S106 agreements and/or Infrastructure Delivery Plan.</p> <p>Transport assessment to consider issues identified in South Bucks and Chiltern Transport Plan and study to be shared with them for comment and consideration.</p> <p>Noted.</p>
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	<p>Would like the Local Plan to refer to important sub-national projects such as the East West Rail and the Oxford to Cambridge Expressway – although not geographically close to Three Rivers they will play a significant role in shaping the future of the national transport network in the south east region</p> <p>Rights of Way</p> <p>Request that long term surface improvements should be made to the public bridle way (CSP/44/3, CSP/44/4, CSP/4/5, CHE/52/2 and CHE/52/51 – map provided) so it's suitable for walkers cyclists etc.</p> <p>Bullsland Lane would benefit from improvements and suggest that any growth funding for sustainable transport could be targeted to achieve improvements to this strategic route benefitting residents of Chorleywood and Chalfont St Peter. It would widen travel options for visitors to AONB.</p> <p>Highways DM</p> <p>The latest South Bucks and Chiltern modelling report show that mitigation measures identified in their traffic and transport modelling process does not account for growth scenarios proposed in Three Rivers and this needs to be addressed.</p>	<p>Will be mentioned in Local Plan if considered appropriate.</p> <p>Improvements to important networks will be considered and included in the Infrastructure Delivery Plan.</p> <p>Consideration will be given to improvements where they are identified, We do not have a sustainable transport fund as we have CIL. Any improvements identified can be included in the Infrastructure Delivery Plan if appropriate.</p> <p>This is because we were not in a position to identify any growth scenarios at the point that this work was done. HCC will be asked to take account of the South Bucks and Chilterns transport modelling when they undertake the transport modelling for Three Rivers.</p>
<p>Chorleywood Parish Council</p>	<p>There is no provision in the document for changes to infrastructure necessary to accommodate the number of new dwellings (education, GPs, traffic, general services)</p> <p>Several sites are within the Green Belt.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Noted. The Green Belt boundary will only be altered to accommodate development needs where we can justify and evidence 'exceptional</p>

	<p>The document disregards the risk of flooding from surface water as defined by HCC National Ecology Society Maps.</p> <p>Concern that access to some of the sites are along narrow lanes which are already congested which will cause conflict between cyclists, pedestrians and vehicles.</p> <p>Request that the Draft Chorleywood Neighbourhood Plan which covers the density and type of building for new developments should be taken into consideration when assessing any future development site.</p>	<p>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>The SFRA Level 1 and Level 2 studies assess the risk of flooding from all sources and are informed by HCC and other relevant stakeholders such as the Environment Agency. SFRA recommendations will be considered in the site assessment process. Any mitigation/remedial measures will be identified in the Infrastructure Delivery Plan and/or site specific S106 Agreement if appropriate.</p> <p>Suitable access to sites will be considered as part of the masterplanning process with consultation with Hertfordshire Highways. Any site specific issues relating to access and local roads may be addressed through site specific S106 agreements and/or in the Infrastructure Delivery Plan or even through the planning application process.</p> <p>Noted. Consideration will be given to draft neighbourhood plan policies in line with the regulations and national planning policies in the Local Plan.</p>
<p>Chiltern and South Bucks</p>	<p>There are a number of sites being assessed in Maple Cross. TRDC should assess the potential transport and infrastructure impacts of these sites in relation to nearby Chiltern District. In particular there are narrow roads linking Maple Cross and Chalfont St Peter - Horn Hill Road, Chalfont Lane and Chalfont Road which may be impacted.</p> <p>There are also potential cross-boundary implications in terms of infrastructure provision, e.g. impact on local school and</p>	<p>Concern about potential impacts on transport and infrastructure are noted. With regards to transport HCC will be asked to take account of the South Bucks and Chilterns transport modelling when they undertake the transport modelling for Three Rivers.</p> <p>Continue discussions on cross boundary issues.</p> <p>Transport assessment to consider issues identified in South Bucks and Chiltern Transport Plan and study to be shared with them for comment and consideration.</p> <p>Infrastructure associated with development within the Local Plan will be identified through the Infrastructure Delivery Plan which assesses the infrastructure capacity</p>

	<p>healthcare facilities. CDC+SBDC would like to be kept informed of further work in relation to these sites.</p> <p>Sites CFS 32 and 33 are large sites near to the Maple Lodge STW – TRDC needs to ensure that the provision of these sites does not create problems for the potential future improvements to the STW. Bearing in mind the likely level of growth in the catchment for the STW, which includes the majority of Chiltern District, there is a concern that large scale allocations here could undermine necessary strategic infrastructure provision.</p>	<p>of health services, Education facilities, Emergency Services, Cultural Services, local transport (traffic management, Highways improvements, and bus network, cycling facilities, Green infrastructure and more. The study is informed by a range of evidence base studies and by the infrastructure providers themselves and is not restricted to the local authority boundaries. The Infrastructure Delivery Plan will be shared with Chiltern and South Bucks District Council.</p> <p>Thames Water has confirmed 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. Their 5 Year Plan 2020 to 2025 states that they will increase the capacity of sewage works to ensure that they can accommodate population growth. Further discussions with Thames Water are to be arranged to discuss waste water network.</p>
<p>Herts County Council Growth and Infrastructure Unit</p>	<p>General information about a range of HCC services together with details of likely future infrastructure requirements.</p> <p>Comments from HCC covering:</p> <p>Ecology A desktop site review has been carried out to look at all the potential sites. Representations on all sites were provide together with an indication as to whether or not detailed ecological assessments are likely to be required.</p> <p>Historic Environment Have undertaken a rapid appraisal of archaeological implications for the areas identified in the Potential Sites Document and have been grouped into four different categories by condition.</p> <p>Minerals and Waste General comments made in relation to Minerals and Waste planning together with comments on a specific site (CFS65) in relation a required buffer of 100m from Waterdale waste site.</p>	<p>Information will be used to help identify the likely infrastructure required and will inform the Infrastructure Delivery Plan and site assessment process. Further advice and information will be sought from HCC as the Local Plan progresses.</p> <p>The information provided will be used to inform the site assessment process. Further consultation with HCC Ecology Team and Historic Environment Team will be undertaken as and when more detailed development proposals/growth scenarios become available. The information provided will be used to inform the site assessment process.</p> <p>The comments on individual sites will be used to inform the site assessment process.</p>

	<p>Highways The comments from Highways are made considering each site individually in its existing context and delivering a typical development. Understanding impacts to settlements would require testing of the growth scenario which will need to be properly modelled and assessed.</p> <p>Network and Travel Planning Comments on specific sites relating to public transport – bus stops/cycle routes/stations etc.</p> <p>Library Services General comments made by the Libraries Service with a specific comments on CFS77 Rickmansworth Library.</p> <p>Waste Management Comments relating to the importance of Waterdale Waste Transfer Station and its operation and sets out concerns about development on site CFS65 and requests a 100m buffer zone on development.</p>	<p>Transport modelling will be undertaken in consultation with HCC. The information will be used to inform the site assessments.</p> <p>The information will be used to inform the site assessments.</p> <p>See CFS77 for specific comments.</p> <p>Noted. A buffer zone will be considered as part of the site assessment process.</p>
Croxley Green Parish Council	<p>Council strongly objects to the allocation of a potential extra 1,600 dwellings within Croxley Green (or on its immediate borders and believe this is disproportionate and totally unsustainable to the overall existing size of Croxley Green.</p> <p>Concern that proposed development would not be supported by existing infrastructure and that existing local services and infrastructure are already under strain and would be wholly inadequate to support the large and concentrated developments</p>	<p>Objection noted.</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 (GPs, Hospitals, Dentists), Education facilities, Emergency Services, Cultural Services (libraries and cemeteries), 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>Concern about the access to some of the larger sites on small residential roads/lanes and additional pressure on the local road network.</p> <p>The Council will vehemently oppose any sites which encroach into the Green Belt and would resist such encroachment on the grounds that the sites would be considered inconsistent with the National Planning Policy Framework principles affecting the Green Belt and therefore “unsound” and would be highly detrimental to the character of the wider landscape and visual amenity.</p> <p>Council is highly concerned about potential coalescence on the eastern boundary between Croxley Green and Watford and on the western boundary between Croxley Green and Loudwater.</p> <p>The Council appreciates the need for housing in the local area and would be prepared to accept a much smaller allocation consisting of a number of small-scale developments providing that such potential developments do not encroach into the Green Belt or compromise coalescence.</p> <p>The Council would like to add that it is imperative that if the Green Belt situated around the Croxley Danes site is ever taken out of specialist protection it must never be used for Purposes other than education.</p>	<p>Suitable access to sites will be considered as part of the masterplanning process with consultation with Hertfordshire Highways. Any site specific issues relating to access and local roads may be addressed through site specific S106 agreements and/or in the Infrastructure Delivery Plan or even through the planning application process.</p> <p>Noted. However National Planning Policy does allow for the alteration of Green Belt boundaries. 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 for 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>A Green Belt Assessment will be undertaken to establish the degree to which sites achieve the five purposes of the Green Belt and will inform the site assessment process.</p> <p>Noted.</p> <p>Noted.</p>
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